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Air Quality		
AQ.1.1	ES Ch.5 [APP-027] Paragraph 5.6.2 Is more recent data available and does this have any implications for the assessments and modelling undertaken?	Data from 2024 is not yet published as the 2025 Annual Status Report is still being written. Once published, the data will be available to the consultants. It is not expected to lead to any significant changes.
AQ.1.2	ES Ch.5 [APP-027] Paragraph 5.13.9 Do you agree with the conclusion “there will be no significant effects in terms of air quality on human and ecological receptors as a result of the Scheme.” If not explain the points of difference with this conclusion.	The modelling indicates impacts from junction works will not be significant adverse impacts. The junction works should improve traffic flows on the A46 however there will be some traffic flow impacts on the roads to the west.
AQ.1.3	Applicant's response to Rule 9 [PD1-016] – Paragraph 7.1.7 The Applicant’s conclusion concerning the impact of the “Interim Planning Guidance on the consideration of the Environment Act PM2.5 targets in planning decisions” - published 4 October 2024 states; in conclusion that “if the interim planning guidance had been in place at the time of the original Scheme air quality assessment, there would be no material changes to the assessment outcomes.” Do you agree? If not explain the points of difference with this conclusion.	Rugby Borough Council agrees.
Alternatives		
AS.1.1	ES Ch.3 [APP-025] – Assessment of Alternatives Do you agree with the assessments of alternatives set out in this chapter and the option selected for this application? If not set out any areas of disagreement.	Rugby Borough Council agrees with the assessment of alternatives.
Climate		
CE.1.7.	Assessment and mitigation Do you agree with the applicant’s conclusions regarding the likely significant effects on greenhouse gases? If you do, provide an explanation; if you do not,	Rugby Borough Council agree with the applicant’s conclusion that the proposed

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	<p>indicate the areas of disagreement with the findings and how this may influence the overall conclusions. (Refer to ES Section 14.11 Assessment of likely significant effects (construction and operation) [APP-036]).</p> <p>Do you consider the Applicants approach to the assessment and mitigation of greenhouse gas emissions to comply with the relevant parts of the National Networks National Policy Statement?</p>	<p>scheme is unlikely to have a significant effect on greenhouse gas emissions.</p> <p>The applicant has completed a series of assessments to review and compare the emissions from the scheme to reach this conclusion. This has included a benchmarking exercise, a comparison against a “do-nothing” baseline, and a review of the contribution to the relevant carbon budgets. This in-depth analysis provides a solid understanding of the scheme’s projected emissions, and estimated it would contribute 0.0003% towards the relevant carbon budgets, an amount that would not be viewed as significant.</p> <p>Additionally, the majority of the emissions are predicted to be seen in the operation of the scheme. With the implementation of the ZEV mandate and the wider strategies supporting a transition away from combustion vehicles, it is fair to consider that there will be considerable operational emissions reductions over time driven by outside factors.</p> <p>Yes, the assessment and mitigation of greenhouse gases (namely carbon dioxide emissions per the measurement used by NPS NN) has complied with the relevant parts of the NPS NN.</p>

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		<p>These cover the consideration of climate change adaptation and vulnerability, involvement of relevant authorities, completing a Whole Life Carbon Assessment, the emissions from construction and operation, reducing emissions as much as possible, and offsetting residual emissions. The Applicants have addressed each of these within these documents. This has been achieved through the calculation of their contribution to the UK carbon budget, the completion of the Whole Life Cycle Carbon Assessment, and commitment to complete a Carbon Management Report at each stage, allowing for additional mitigation work as needed.</p>
CE.1.14	<p>Management Measures What are your views on the Outline Carbon Management Plan (Appendix B.8, [APP-109]) regarding: - Approach - Carbon Management Process - Monitoring and Reporting What are your views on the management measures C1 through to C3 (related to climate) set out in Table 1 of the First Iteration Environmental Management Plan Appendix A, Register of Environmental Actions and Commitments [APP-110]? What are your views on the mitigation measures to minimise the carbon emissions from construction and operation? (Refer to Section 14.10 of ES Chapter 14 [APP-036]). Would the dDCO [REP1-002], and Table 1 of the Register of Environmental Actions and Commitments [APP-110] adequately secure all measures required to reduce the environmental impacts on climate?</p>	<p>The applicants have followed PAS 2080:2023 to complete the carbon management plan, a robust and holistic framework. The value-chain focus ensures that Scope 3 emissions have also been accounted for - a significant source of emissions during construction. This process has guaranteed reduction activities are identified and implemented throughout the development.</p> <p>It is positive to see the consideration for how data availability and ability to deliver emission reduction will change as the scheme progresses. This shows how the larger strategy has been developed with specific actions refined at later stages. This has been factored</p>

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		<p>in with the Carbon Management reviews and keeping the Carbon Opportunities Register live throughout the project.</p> <p>The workshops with the design team are a good way to ensure they understand reduction requirements and take time to thoroughly explore different strategies.</p> <p>Carbon Management Process: The applicant have broken the scheme into logical stages for review and identified the relevant connections to carbon emissions. Whilst it is useful to see the breakdown of estimated emissions from the preliminary design against the baseline, there could've been more details. For example, including why the carbon reduction target was set at 20% and how the baseline was calculated. This would help show the significance of the 55% reduction against baseline in the preliminary design.</p> <p>Additionally, it is good to see that the applicant will continue to complete operation assessments for 60 years, but it does not state how frequently those will take place.</p> <p>Monitoring and Reporting: The plan for monitoring and reporting sounds effective, ensuring that there is detailed analysis of the anticipated emissions and</p>

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		<p>future opportunities to take action. The carbon intensity tracking on the Carbon Opportunities Register should guarantee changes during implementation are accounted for.</p> <p>C1: The applicant has identified several strategies for reducing emissions that appear to be suitable for this project. Several mention the carbon intensity of the construction materials or the lifespan of the object, demonstrating the applicant's whole life cycle approach. However, it is unclear if any are already committed within the plans versus being explored, or what options could produce significant reductions and should be prioritised.</p> <p>C2: The applicant's approach to monitoring emissions throughout the whole life cycle of the scheme will provide accurate accounting of the carbon emissions.</p> <p>C3: the applicant's commitment to review updates to climate change modelling up to construction should ensure the scheme is updated as necessary.</p> <p>It is fair to state that this does not continue through the construction stage as commitments will have been made and it would be unreasonable to implement sudden</p>

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		<p>changes, especially with the relatively short construction period (18 months). However, the applicant could have considered restarting the evaluation of climate change models for the operation phase, as it could impact maintenance and usage of the scheme.</p> <p>The applicant has identified many ways in which the scheme will minimise the construction and operation carbon emissions. The examples given were able to demonstrate the opportunity for mitigation across different components and appear to be viable options.</p> <p>The three step approach to mitigation outlined in paragraph 14.10.5. (namely Avoid; Switch; Improve) should ensure mitigation measures are delivered appropriately and prioritise the avoidance of highly emitting actions. This is supported by the detailed examples of mitigation opportunities, with a particular focus on reusing materials. An important consideration due to the connections between waste and climate change, including consumption of new materials, transport emissions, demand for land, and emissions from waste processing. The benefits of recycled materials were identified by the applicant.</p> <p>The fact that that several mitigation strategies are described using “there is an opportunity”</p>

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		<p>creates uncertainty around the commitment to those approaches. This raises a potential concern that after further exploration and other factors are considered (e.g., costs, supplier availability) the actual mitigation actions delivered are significantly less than initially identified. This may have been supported by comments on the feasibility or prioritisation of different suggestions, or noting potential challenges. For example, paragraph 14.10.13. notes the potential use of HVO fuel and the carbon savings are dependent on whether it has been sourced sustainably; there are also availability concerns as demand is growing.</p> <p>The applicants have included very few strategies for mitigating operational emissions, outside of some comments on extending the life of constructed components (e.g., pavements). However, as acknowledged by the applicants within ES Chapter 14, these will largely come from end-users and there are likely minimal operational mitigation measures that could be implemented.</p> <p>The applicant has provided an extensive list of actions in the dDCO and the Register of Environmental Actions and Commitments, which should secure the measures to reduce environmental impacts.</p>

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Combined and cumulative effects		
CC.1.5	Cumulative effects with other developments Do the local planning authorities agree with the list of other developments included in the cumulative effects assessment (Refer to Section 15.8 of ES Chapter 15 [APP-037])?	Rugby Borough Council agrees with the list of developments included in the cumulative effects assessment.
Draft Development Consent Order (dDCO) [REP1-002]		
DCO.1.6	A23, Protective work to buildings Are the measures stipulated in this article acceptable?	Rugby Borough Council has no comment on this question.
DCO.1.8	A26, Trees subject to tree preservation orders Do you have any concerns about the powers, relating to TPO trees, that would be granted by this article?	<p>We do not have concerns. As per the AIA “None of the trees proposed for removal are afforded statutory protection by a TPO, Conservation Area, nor considered aged or veteran”.</p> <p>With regard proposed ground works in close proximity to TPO trees the AIA states:</p> <p><i>“There are groundworks would be required to facilitate the new environmental bund and perimeter fencing adjacent to Coombe Pool SSSI woodland boundary. This will require working within the RPAs of retained trees subject to statutory protection. Sensitive working methodologies, temporary ground protection and on-site supervision will ensure that no foreseeable damage occurs to the retained trees. All trees to be retained on the site will be protected by barriers and/or ground protection to create a CEZ around their associated RPA. The protective barriers are to be installed prior to any development activity”</i></p>

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		Details of this would be confirmed by a finalised Arboricultural Method Statement to be overseen by an Arboricultural clerk of works.
DCO.1.11	A53, Amendment of local legislation Are you content with the amendments to local legislation stipulated in this article to undertake this project?	Rugby Borough Council is content with this.
DCO.1.12	Schedule 2 – Requirements Requirement (R) 3, Detailed design Does the Council have any comments about the process stipulated in this requirement, in particular with reference to the new bridge design.	Rugby Borough Council has no comment on this.
DCO.1.17	Schedule 2 – Requirements R13, Pre-commencement works Have the Council any views on this requirement relating to the pre-commencement plan [APP112]?	Rugby Borough Council has no comment on this.
Geology and Soils		
GS.1.1	Assessment and mitigation Do you agree with the applicant's conclusions regarding the likely significant effects on geology and soils relating to human health, controlled waters and agricultural soils? If you do, provide an explanation; if you do not, indicate the areas of disagreement with the findings and how this may influence the overall conclusions. • Refer to ES Section 9.11 Assessment of likely significant effects [APP-031]). Do you consider the Applicants approach to the assessment and mitigation of land use and land contamination and instability to comply with the relevant parts of the National Networks National Policy Statement?	Rugby Borough Council agrees. The nature of the receptors has not changed, (no gross contamination being identified that needed special remediation activities). The Second Iteration EMP would include following management plans: • Site Waste Management Plan (SWMP) • Materials Management Plan (MMP) • Soil Management Plan (including a Soil Handling Management Plan).
GS.1.5	Management Measures What are your views on the management measures GS1 through to GS5 set out in Table 1 of the First Iteration Environmental Management Plan Appendix	Noted and considered acceptable, hours of work are longer than normally accepted within Rugby Borough, however as a major

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	A, Register of Environmental Actions and Commitments [APP-110]? Would the dDCO [REP1-002], and Table 1 of the Register of Environmental Actions and Commitments [APP-110] adequately secure all measures required to reduce the environmental impacts of material assets and waste?	infrastructure project, allowing slightly extended time to facilitate quicker completion of scheme is considered acceptable.
Historic Environment		
HE.1.2	<p>ES Ch.6 [APP-048] Cultural Heritage - Paragraph 6.4.7</p> <p>The third bullet point of this paragraph records the concern expressed by Coventry City Council as owner of the Coombe Abbey Park but there is no mention of any such concerns from Rugby Borough Council as local planning authority. Does it share these concerns, and if so where are its views set out in Chapter 6?</p>	<p>Rugby Borough Council are of the opinion that the assessment undertaken as summarised in Chapter 6 (Cultural Heritage) of the Environmental Statement is adequate and the Borough Council are in agreement with the assessment in that there would be a neutral residual effect upon the Coombe Abbey Registered Park and Garden from the scheme. Consequently, the Borough Council are of the opinion there would be no adverse impacts from the scheme upon designated heritage assets located within its boundary.</p> <p>However, it is noted that when utilising the methodology table set out in the assessment (table 6-7) and when a professional judgement is applied (see section 6.5.20) that a negligible impact on a high value heritage asset (the Coombe Abbey RPG) this could also result in a slight adverse rather than neutral effect. Such an effect from the scheme would most likely be classed as less than substantial harm in terms of the National Planning Policy Framework (NPPF), so if the examiner is minded to conclude that the scheme would result in such a level of harm then the harm vs public benefits balancing exercise as required</p>

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		by paragraph 215 of the NPPF should be applied, whilst also giving demonstrable application of the requirements of paragraphs 212 and 213 in the exercise.
Landscape and Visual		
LV.1.1	<p>Assessment and mitigation</p> <p>Do you agree with the applicant's conclusions regarding the likely significant effects on landscape and visual receptors arising from the Proposed Development? If you do, provide an explanation; if you do not, indicate the areas of disagreement with the findings and how this may influence the overall conclusions. (Refer to ES Section 7.11 Assessment of likely significant effects (both during construction and operation) [APP-029]).</p> <p>Do you consider the Applicants approach to assessing and mitigating landscape and visual effects to comply with the relevant parts of the National Networks National Policy Statement?</p>	Rugby Borough Council does not have the in-house expertise to advise on landscape and visual matters. Therefore, we are unable to respond to this question.
LV.1.2	<p>Extent of land allocated as Green Belt</p> <p>Reference to the extent of the green belt is given in [REP1-036] (paragraph 5.5) and [APP-029] (Table 7.2 under reference to paragraph 5.181) and is also shown in ES Figure 7.1 (Landscape Policy Context) [APP-049]. State the full extent of land within your administrative boundary allocated as Green Belt</p>	<p>The extent of the Green Belt shown in Figure 7.1 is correct. All land within Rugby Borough within the red line boundary and a 1km radius (with the exception of the small area of land within the settlement boundary of the village of Binley Woods) is designated as Green Belt in the Rugby Borough Local Plan 2011-2031 adopted June 2019.</p> <p>It should be noted that the local authority boundary between Rugby Borough and Coventry City is the western edge of A46 verge on its boundary with adjacent agricultural land. This boundary is the western extent of Green Belt within Rugby Borough.</p>

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LV.1.12	<p>Management Measures</p> <p>What are your views on the Outline Landscape and Ecology Management Plan (Appendix B.4, [APP-109]) regarding:</p> <ul style="list-style-type: none"> (i) landscape requirements (ii) landscape strategy and principles; and (iii) establishment, management and maintenance? <p>What are your views on the management measures LV1 through to LV3 set out in Table 1 of the First Iteration Environmental Management Plan Appendix A, Register of Environmental Actions and Commitments (REAC) [APP-110]? Would the dDCO [REP1-002], Table 1 of the Register of Environmental Actions and Commitments [APP-110], and Appendix B.4 [APP-109] adequately secure all measures required to protect landscape and visual amenity?</p>	Rugby Borough Council defers to the comments of Warwickshire County Council (if any) on this question.
Material Assets and Waste		
M.W.1.1	<p>Assessment and mitigation</p> <p>Do you agree with the applicant's conclusions regarding the likely significant effects on material assets and waste arising from the Proposed Development? If you do, provide an explanation; if you do not, indicate the areas of disagreement with the findings and how this may influence the overall conclusions.</p> <p>(Refer to Section 10.11 of ES Chapter 10 [APP-032]).</p> <p>Do you consider the Applicants approach to reducing waste safely and maximising resource usage to comply with the relevant parts of the National Networks National Policy Statement?</p>	<p>Rugby Borough Council agrees and agreed with original plans for control and disposal/ reuse of waste materials arising.</p> <p>It is noted that the Second Iteration EMP would include following management plans: • Site Waste Management Plan (SWMP) • Materials Management Plan (MMP) • Soil Management Plan (including a Soil Handling Management Plan)</p>
MW.1.12	<p>Management Measures</p> <p>What are your views on the Outline Site Waste Management Plan (Appendix B.3 [APP-109]) regarding:</p> <ul style="list-style-type: none"> (i) resource efficiency and waste minimisation (ii) waste management (iii) monitoring; and (iv) audit and review? 	Accepted at this stage, liable to be updated as the project proceeds.

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	<p>What are your views on the management measures MA1 through to MA7 set out in Table 1 of the First Iteration Environmental Management Plan Appendix A, Register of Environmental Actions and Commitments [APP-110]? Would the dDCO [REP1-002], Table 1 of the Register of Environmental Actions and Commitments [APP-110], and Appendix B.3 [APP-109] adequately secure all measures required to reduce the environmental impacts of material assets and waste?</p>	
Noise and Vibration		
NV.1.2	<p>Assessment and mitigation</p> <p>Do you agree with the applicant's conclusions regarding the likely significant effects of noise and vibration arising from the Proposed Development? If you do, provide an explanation; if you do not, indicate the areas of disagreement with the findings and how this may influence the overall conclusions. (Refer to ES Section 11.11 Assessment of likely significant effects (both during construction and operation) [APP-033]).</p> <p>Do you consider the Applicants approach to managing the impacts of noise and vibration (on human and ecological receptors) to comply with the relevant parts of the National Networks National Policy Statement?</p>	<p>Rugby Borough Council agrees.</p> <p>Specific issues can be investigated and controlled as the project proceeds and even under Control of Pollution Act 1974 with Best Practicable Means requirements if necessary.</p> <p>In summary, the proposed work will be noisy and noticeable above existing background noise levels. As construction work though, it will be of limited duration and once completed, should have a beneficial effect including on air quality by allowing smoother flow of traffic. There will be short noise and vibration impacts associated with construction works and route diversions. These should be minimised by using 'best practicable means' (BPM) as per the different pieces of appropriate legislation and guidance documents referred to. The longer-term operational noise and other impacts are predicted to lead to an overall improvement.</p>
NV.1.8	Management Measures	Rugby Borough Council accepts (i) –(iv) in relation to the Outline Construction Noise and

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	<p>What are your views on the Outline Construction Noise and Vibration Management Plan (ES Appendix B.2, [APP-109]) regarding:</p> <ul style="list-style-type: none"> (i) noise and vibration control measures (ii) specific measures (iii) protection of buildings; and (iv) (iv) monitoring and reporting? <p>What are your views on the management measures NV1 through to NV4 set out in Table 1 of the First Iteration Environmental Management Plan Appendix A, Register of Environmental Actions and Commitments [APP-110]?</p> <p>Would the dDCO [REP1-002], Table 1 of the Register of Environmental Actions and Commitments [APP-110], and ES Appendix B.2 [APP-109] adequately secure all measures required to reduce the environmental impacts of noise and vibration?</p>	<p>Vibration Management Plan (ES Appendix B.2, [App-109]).</p> <p>Section 6 for vibration limits is noted and concurred with. There is the potential for impact upon buildings from construction works and operational changes, however, the proposed controls and predictions from the assessments show reference has been made to relevant standards. This would not prevent either more detailed site-specific assessment or local target limits on construction impacts being recommended for the listed buildings.</p>