Кеу	
	Added 23.11.17
	Added 6.12.17
	Added from another policy

120	Roger Jackson	NA	NA	Local	House-building programme which		Housing trajectory identifies completions
				Plan	would increase population of		within the plan period. DS8 makes
					Rugby by 56% by 2031 ignores		specific requirement of a buffer between
					quality of life of existing		Rugby and Dunchurch, which will be
					residents; Local Plan unclear how		further detailed in the framework
					many houses built between 2016-		masterplan and adhered to in subsequent
					2031; coalescence between		planning applications. The SHMA has
					Dunchurch and Rugby, loss of		been produced consistent to the
					amenity and noises, air pollution		requirements of the NPPF and NPPG and
					and congestion impacts on		has been found sound by the Inspectors
					residents during construction		of the Warwick and Coventry Local plans
					period; draft plan unsound due to		EiPs. The STA June 2017 updated the
					flaws in calculating housing		September 2016 STA by increasing the
					numbers; information submitted		modelled area so that it extends south to
					is inconsistent and mixes	1	the of the A45 and into Daventry DC, it
					projected housing (with planning		has incorporated updated travel to work
					permission already granted) with		assumption, junction counts and queue
					housebuilding on newly proposed		surveys, to identify the strategic
					land allocations; 25% of the plan	1	transport infrastructure to support the
					period has already happened		Local Plan. The delivery of the South
					(since 2011), planning permission		West spine road is a necessity
					has already been granted and		infrastructure requirement to support
					land where permission might be	1	the delivery of the Local Plan. There is
					granted in the future; existing		nothing before the Council that would
					housing trajectory total in	2	suggested that the road will not be
					Appendix 2 refers to 5,633 homes		delivered.
					built by 2031 includes 57 outside	2	STA has shown that proposed mitigation
					the urban edge of Rugby (Newton		schemes reduce traffic flows through
					lane, Ryton, Wolvey, Draycote	1	Dunchurch crossroads compared to the
					Water, Wolston) giving 5576		existing levels.

Name

Image: Solution of the soluti	 		
homes to give an overall total of 6,621 built by 2031; DS3.1 to DS3.5 lists a total of 13,400 homes to be allocated, although Appendix 2 lists some of these already totalling 2,832 homes at Coton House (65), Coton Park East (145), Rugby Gateway (132), Rugby Radio Station (2,490); 13,400,5,576 and 2,832 equals 16,144 total built within the plan period. Homes to be allocated, Rugby Radio Station (2,490); 16,144 total built within the plan period. Homes are required to maintain a support of the plan period. Homes (12,802) Identified requirement, much of this is 13,400,5,576 and 2,832 equals 16,144 total built within the plan period. Homes (12,802) identified requirement, much of this 13,400,5,576 and 2,832 equals 16,144 total built within the plan period. Homes to be allocated quality of life, access to amenities, traffic congestion and the environment generally; 10,144 new homes before 2031 will result in the population of Rugby Town increasing from Ses 333 people to 107,083 which is unreasing from Ses 333 people to 107,083 which is unreasing from Appendix 2 (3,918 and 5,182) cannot be reconciled; astunding that only 40% of the 6,200 homes on the former Rugby Radio Station Mast site will be built by 2031 and only 20 houses will be delivered in 2016/17 despite Planning Permission being granted 3 years ago; correng this Surdal of 3,700 homes			
6,621 built by 2031; DS3.1 to consultation response and the updated 053.5 lists a total of 13,400 -54.58 and LP54.120-124). All sites 054.58 and LP54.120-124). All sites proposed are required to maintain a 5 054.68 and LP54.120-124). All sites proposed are required to maintain a 5 054.58 and LP54.120-124). All sites proposed are required to maintain a 5 054.68 and LP54.120-124). All sites proposed are required to maintain a 5 054.78 and LP54.120-124). All sites proposed are required to maintain a 5 054.78 and LP54.120-124). All sites proposed are required to maintain a 5 054.78 and LP54.120-124). All sites proposed are required to maintain a 5 054.78 and LP54.120-124). All sites proposed are required to maintain a 5 054.78 and LP54.120-124). All sites proposed are required to maintain a 5 054.78 And DP54.120-124). All sites proposed are required to maintain a 5 165.74 A total built within the plan identified requirement, much of this is interspont.161.120.120.120.120.120.120.120.120.120.12			
DS3.5 lists a total of 13,400 Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120-124). All sites proposed are required to maintain a 5 already totalling 2,832 homes at period. Makes provision for a larger Coton House (65), Coton Park period. Makes provision for a larger East (145), Rugby Gateway (132), housing land supply relative to its Rugby Radio Station (2,490); lidentified requirement, much of this is 13,400, 5576 and 2,832 equals linked to longer term infrastructure 16,144 total built within the plan extension sites which will remain developable beyond the Plan period. period. This is investment and part of large urban extension sites which will remain developable beyond the Plan period. Discussions with developers/landowners amenities, traffic congestion and the environment generally; permissions have taken place to inform a 16,144 new homes before 2011 deliverable housing trajectory. These sites alone will not be sufficient to deliver will result in the population of sites alone will not be sufficient to deliver system and supply throughout the plan period. Updated Housing trajectory total ny 40% of the 6,200 homes year land supply throughout the plan genid. Updated Housing Trajector		homes to give an overall total of	amended following consideration of this
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Appendix 2 lists some of these already totalling 2,832 homes at coton House (65), Coton Park East (145), Rugby Gateway (132), Rugby Radio Station (2,490); lidentified requirement, much of this is linked to longer term infrastructure inkets to longer term infrastructure inkets to longer term infrastructure advision and the part of large urban extension sites which will remain detrimental to Rugby residents quality of life, access to amenities, traffic congestion and the environment generally; life e		DS3.5 lists a total of 13,400	Strategic Transport Assessment (LP54.46
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16,144 total built within the plan period- this figure will be detrimental to Rugby residents quality of life, access to amenities, traffic congestion and the environment generally; investment and part of large urban extension sites which will remain developable beyond the Plan period. Discussions with developers/landowners of existing sites benefiting from planning permissions have taken place to inform a deliverable housing trajectory. These will result in the population of Rugby Town increasing from the unrealistic and unsound; sub- is unrealistic and unsound; sub- geried. Updated Housing Trajectory totals in Paragraph 4.12 and Appendix 2 (3).18 and 5,182) cannot be reconciled; astounding that only 40% of the 6,200 homes on the former Rugby Radio Station Mast site will be built by 2031 and only 20 houses will be delivered in 2016/17 despite Planning Permission being granted 3 years ago; correcting this sortfall of 3,710 homes		Rugby Radio Station (2,490);	identified requirement, much of this is
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16,144 new homes before 2031 will result in the population of Rugby Town increasing from 68,333 people to 107,083 which is unrealistic and unsound; sub- totals in Paragraph 4.12 and Appendix 2 (3,918 and 5,182) cannot be reconciled; astounding that only 40% of the 6,200 homes on the former Rugby Radio Station Mast site will be built by 2031 and only 20 houses will be delivered in 2016/17 despite Planning Permission being granted 3 years ago; correcting this shortfall of 3,710 homesdeliverable housing trajectory. These sites alone will not be sufficient to deliver the housing target and a continuous 5 year land supply throughout the plan period. Updated Housing Trajectory available online.		amenities, traffic congestion and	of existing sites benefiting from planning
will result in the population of Rugby Town increasing from 68,333 people to 107,083 which is unrealistic and unsound; sub- totals in Paragraph 4.12 and Appendix 2 (3,918 and 5,182) cannot be reconciled; astounding that only 40% of the 6,200 homes on the former Rugby Radio Station Mast site will be built by 2031 and only 20 houses will be delivered in 2016/17 despite Planning Permission being granted 3 years ago; correcting this shortfall of 3,710 homes		the environment generally;	permissions have taken place to inform a
Image: second		16,144 new homes before 2031	deliverable housing trajectory. These
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 is unrealistic and unsound; sub- totals in Paragraph 4.12 and Appendix 2 (3,918 and 5,182) cannot be reconciled; astounding that only 40% of the 6,200 homes on the former Rugby Radio Station Mast site will be built by 2031 and only 20 houses will be delivered in 2016/17 despite Planning Permission being granted 3 years ago; correcting this shortfall of 3,710 homes 		Rugby Town increasing from	the housing target and a continuous 5
totals in Paragraph 4.12 and Appendix 2 (3,918 and 5,182) cannot be reconciled; astounding that only 40% of the 6,200 homes on the former Rugby Radio Station Mast site will be built by 2031 and only 20 houses will be delivered in 2016/17 despite Planning Permission being granted 3 years ago; correcting this shortfall of 3,710 homes		68,333 people to 107,083 which	year land supply throughout the plan
Appendix 2 (3,918 and 5,182) cannot be reconciled; astounding that only 40% of the 6,200 homes on the former Rugby Radio Station Mast site will be built by 2031 and only 20 houses will be delivered in 2016/17 despite Planning Permission being granted 3 years ago; correcting this shortfall of 3,710 homes		is unrealistic and unsound; sub-	period. Updated Housing Trajectory
cannot be reconciled; astounding that only 40% of the 6,200 homes on the former Rugby Radio Station Mast site will be built by 2031 and only 20 houses will be delivered in 2016/17 despite Planning Permission being granted 3 years ago; correcting this shortfall of 3,710 homes		totals in Paragraph 4.12 and	available online.
that only 40% of the 6,200 homes on the former Rugby Radio Station Mast site will be built by 2031 and only 20 houses will be delivered in 2016/17 despite Planning Permission being granted 3 years ago; correcting this shortfall of 3,710 homes		Appendix 2 (3,918 and 5,182)	
Image: Second		cannot be reconciled; astounding	
Station Mast site will be built by 2031 and only 20 houses will be delivered in 2016/17 despite Planning Permission being granted 3 years ago; correcting this shortfall of 3,710 homes		that only 40% of the 6,200 homes	
2031 and only 20 houses will be delivered in 2016/17 despite Planning Permission being granted 3 years ago; correcting this shortfall of 3,710 homes		on the former Rugby Radio	
delivered in 2016/17 despite Planning Permission being granted 3 years ago; correcting this shortfall of 3,710 homes		Station Mast site will be built by	
Planning Permission being granted 3 years ago; correcting this shortfall of 3,710 homes		2031 and only 20 houses will be	
granted 3 years ago; correcting this shortfall of 3,710 homes		delivered in 2016/17 despite	
this shortfall of 3,710 homes		Planning Permission being	
		granted 3 years ago; correcting	
would negate the need for			
		would negate the need for	
development in South West			

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
					Rugby- rendering the draft Plan		
					unsound; Plan equally unsound		
					due to lack of justification for		
					proposed housing numbers; huge		
					implications for house-building		
					on Rugby Urban edge; no		
					justification for accepting 2,800		
					homes from Coventry; Coventry's		
					population is 5 times larger and		
					with a larger urban edge so		
					Coventry is able to accommodate		
					this growth; Paragraph 4.7		
					contradicts Paragraph 3.16 which		
					states an overspill would be		
					contrary to strategy unless merit		
					can be made; overspill		
					constitutes 1/6 of the houses		
					proposed or be built between		
					2016-2031- draft Plan unsound as		
					overspill should not be included		
					within the Local Plan; IDP lacks		
					detail on costings of proposed		
					infrastructure; implausible to rely		
					on developers to meet costs of		
					new roads etc. as developers will		
					add the cost of infrastructure to		
					house prices meaning no		
					affordable homes and developers		
					would delay implementation for		
					as long as possible to avoid		
					harming cash flow; no provision		
					to ensure infrastructure in place		
					before development starts		
					therefore plan is unsound;		
					proposed parking standards are		
					inadequate and fail to provide		

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ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
378	D Scott	NA	NA	Local Plan	adequate amenity and convenience for future residents; any less than a minimum of 2 parking spaces for all properties would result in unsightly and unsafe parking; low and high access distinction flawed as residents close to the town centre still car dependent; Focusing growth in in an area with a low service base where people would have no choice other than to travel both to work and to meet their leisure and retails needs. A new settlement has little prospect of early delivery within the plan period. It is unlikely that any mitigation or potential remedial work could hinder the assumed delivery rate of and affect the maintenance of a 5 year housing supply throughout the plan period.		There are no known constraints on Development. The Development Strategy seeks to provide a range of sites in terms of size and location to provide a 5 year housing land supply. Focusing growth on Rugby Town did not achieve the levels of delivery hoped for in the previous Plan period. WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.
395	Mark Pawsey MP	NA	NA	Local Plan	Given the significant changes between the publication draft of the local plan 2011-2031 and the preferred options local residents		Relevant consultations have been carried out in accordance with the Town and Country Planning Act 2012. No further action required. Independent consultants

Name

need additional time to assess	G L Hearn produced the SHMA and the
and comment on the document.	subsequent updates for the entire
The publication draft relies upon	Housing Market Area (HMA). Relevant
complex inter-related	consultations consistent with the town
documents- namely the 2015	and country planning regulation 2012 and
employment land study and the	the council adopted SCI have been
HMA housing need study.	carried out in relation to this policy. The
Constituents in contact in relation	SHMA has been produced consistent to
to the housing needs calculations	the requirements of the NPPF and NPPG
produced by the consultants and	and has been found sound by the
the deviation between the	Inspectors of the Warwick and Coventry
preferred option and publication	Local plans EiPs. The achievements of the
draft versions of the plans. Alan	plan are considered to be consistent with
Wenban Smith for the Council to	the requirements of the NPPF and the
Protect Rural England has	evidence which informs the Local Plan.
produced a report questioning	Therefore no amendments considered
the consultant's methodology.	necessary. The selection of sites as
The OAN needs further scrutiny	informed by the SHLAA, and other
to ensure the calculations and	relevant evidence, for proposed
methodology is correct. The	allocation contained within the
business community is concerned	development strategy represents the
in relation to the loss of	most sustainable strategy and the
employment land through	housing allocations ensure a continuous
Walsgrave Hall Farm site being	supply of housing to meet the housing
removed. Expansion of Ansty	target.
research and development park	
should be supported and area	
taken out of the greenbelt; the	
option of a greenbelt swop	
should be explored. The	
sustainability of the proposed	
Lodge Farm site requires further	
assessment.	
assessificili.	

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
437	Richard Pell	NA	NA	Local Plan	Requirement for housing grossly over exaggerated. Why is Rugby taking housing for Coventry? Infrastructure not capable of supporting growth. Local Plan appears to rely upon private car. There is nothing to stimulate the town centre. Lodge Farm ill- conceived uses valuable farmland. Sites with planning permission should be built out first. Where is the industry going to go? Object to DS8 - land between Dunchurch and rugby valuable, ancient woodland, valuable farmland. Light and air pollution will worsen. Thurlaston conservation area will only by 300m away from SW Rugby. Also poorly located for access to town centre.		Independent consultants G L Hearn produced the SHMA and the subsequent updates for the entire Housing Market Area (HMA). Relevant consultations consistent with the town and country planning regulation 2012 and the council adopted SCI have been carried out in relation to this policy. The SHMA has been produced consistent to the requirements of the NPPF and NPPG and has been found sound by the Inspectors of the Warwick and Coventry Local plans EiPs. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary. All sites proposed are required to maintain a 5 year land supply throughout the plan period. Makes provision for a larger housing land supply relative to its identified requirement, much of this is linked to longer term infrastructure investment and part of large urban extension sites which will remain developable beyond the Plan period. It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in

the SHLAA.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
663	G Cross	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.		The growth contained within the Local Plan is supported by the IDP which specifies the type, amount and phasing of infrastructure informed by engagement with relevant service providers. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary.
663	G Cross	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.		WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within the IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.
709	G E Davies	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.		The growth contained within the Local Plan is supported by the IDP which specifies the type, amount and phasing of infrastructure informed by engagement with relevant service providers. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary.

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709	G E Davies	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.	WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within the IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.
777	G Storer	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.	The growth contained within the Local Plan is supported by the IDP which specifies the type, amount and phasing of infrastructure informed by engagement with relevant service providers. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
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777	G Storer	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.	WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within the IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.
786	F Stevenson	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.	The growth contained within the Local Plan is supported by the IDP which specifies the type, amount and phasing of infrastructure informed by engagement with relevant service providers. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary.
786	F Stevenson	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.	WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within the IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
798	G Flower	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.		The growth contained within the Local Plan is supported by the IDP which specifies the type, amount and phasing of infrastructure informed by engagement with relevant service providers. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary.
798	G Flower	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.		WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within the IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.
811	G Baynes	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.		The growth contained within the Local Plan is supported by the IDP which specifies the type, amount and phasing of infrastructure informed by engagement with relevant service providers. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
915	J.H McHugh	NA	NA	Local Plan	Object to local plan and any development on the A426 north of the M6 junction. There is considerable wildlife in this area and also the loss of green belt between the M6 and Churchover. Also the A426 is gridlocked for many hours a day which will only increase if there is further development.		The selection of sites as informed by the SHLAA, and other relevant evidence, for proposed allocation contained within the development strategy represents the most sustainable strategy and the housing allocations ensure a continuous supply of housing to meet the housing target. Traffic flows subject to assessment by Warwickshire County Council Highways.
958	G Trodd	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.		The growth contained within the Local Plan is supported by the IDP which specifies the type, amount and phasing of infrastructure informed by engagement with relevant service providers. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary.
958	G Trodd	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.		WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within the IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
980	G Watt	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.		The growth contained within the Local Plan is supported by the IDP which specifies the type, amount and phasing of infrastructure informed by engagement with relevant service providers. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary.
980	G Watt	NA	NA	Local Plan	INFRASTRUCTURE: No assurance that needs of the development can be met. Great deal of time to provide supporting infrastructure and services and impact of existing services and infrastructure is severely underestimated.		WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within the IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
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1117	Susan Robards	NA	NA	Local	Rugby Borough Council has failed	RBC should publish	Relevant consultations consistent with
				Plan	to reach standards of fairness in	missing information;	the town and country planning regulation
					regards to the Local Plan	engage with the public	2012 and the council adopted SCI have
					consultation; In March 2016 RBC	regarding its Transport	been carried out in relation to this policy.
					was seeking advice from WCC	Assessment; hold a	Independent consultants G L Hearn
					about the impact of Lodge Farm	further consultation on	produced the SHMA and the subsequent
					yet it wasn't until 6 months later	its Local Plan; publish	updates for the entire Housing Market
					that the public were consulted-	and consider the	Area (HMA). Relevant consultations
					RBC did not consult when the	responses to the	consistent with the town and country
					proposal was in its formative	consultation and	planning regulation 2012 and the council
					stage, which goes against legal	produce a publication	adopted SCI have been carried out in
					judgements; RBC hid GL Hearns	draft two for formal	relation to this policy. The SHMA has
					algorithms under the cloak of	consultation prior to	been produced consistent to the
					commercial confidentiality;	submission to the	requirements of the NPPF and NPPG and
					accepting 2,800 homes from	planning inspector.	has been found sound by the Inspectors
					Coventry's need without		of the Warwick and Coventry Local plans
					demonstrating why Coventry		EiPs. The achievements of the plan are
					cannot meet its own needs;		considered to be consistent with the
					allocating land for 20,000 houses		requirements of the NPPF and the
					against a need of 12,400; failing		evidence which informs the Local Plan.
					to explain the impact of Rugby		Therefore no amendments considered
					South West on the A4071/B4453		necessary. The justification of Coventry
					junction; failing to engage the		City's unmet housing need is borne out of
					public on the transport		the work undertaken at the HMA level by
					assessment; RBC consulted		all HMA authorities. The report to the
					before publishing all its evidence;		Coventry, Warwickshire and South West
					Lodge Farm masterplan not		Leicestershire Shadow Economic
					available to the public for 6		Prosperity Board in September which
					weeks after the consultation		accompanied the Memorandum of
					closes; both Members of		Understanding details the research and
					Parliament for Rugby believe RBC		cooperation between the six planning
					has given insufficient time for		authorities with responsibility for
					consultation; report on preferred		planning for housing need, as well as
					options consultation was not		Warwickshire County Council, that
					produced until September 2016		determined the level of unmet need from
					when the publication draft		Coventry and how this is distributed to

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
					consultation started in July 2016- proper weight was not given to the representations received given the decision to start the July Consultation without feedback from the earlier consultation; RBC has failed to meet the standard of fairness set by public law in producing its publication draft;		the shire authorities. This is further reinforced by the Inspector of the Coventry City Local Plan accepting the evidence demonstrating the capacity of Coventry in meeting its own housing need. This approach and the MoU have also been accepted by the inspector of Warwick's local plan. No alteration proposed. All sites proposed are required to maintain a 5 year land supply throughout the plan period. Makes provision for a larger housing land supply relative to its identified requirement, much of this is linked to longer term infrastructure investment and part of large urban extension sites which will remain developable beyond the Plan period. WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1143	Cllr Mrs Jane Wright/Barbar a Dent	Monks Kirby PC	NA	Local Plan	Particular considerations in the Publication Draft include: There is improved explanation and details given on significant aspects of infrastructure, though it is noted that there is still some way to go. Increased detail on the protection of the rural areas is welcomed, especially on development in rural settlements. Improved balance is provided by the fuller discussion of the range of local needs and the place of affordable		Comments welcomed.
1143	Cllr Mrs Jane Wright/Barbar a Dent	Monks Kirby PC	NA	Local Plan	housing within it. However MKPC is critical of: The lack of explicit acknowledgement of defined village envelopes in rural settlements. The lack of discussion of Village Conservation Areas. MKPC finds these of concern, particularly in conjunction with the erosion of Green Belt where its loss would mean the loss of agricultural land or land lying outside a current village envelope, and believes that development of such land would be detrimental to the natural and established nature of the village's structure.		Conservation Areas are already defined so no change to them considered necessary. Green Belt development has been subject to a green belt review.
1143	Cllr Mrs Jane Wright/Barbar a Dent	Monks Kirby PC	NA	Local Plan	MKPC would like these points to be given additional consideration but within these limitations the parish council supports the Plan.		Comment welcomed

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1160	Stuart Hallahan	NA	NA	Local Plan	Recognize the need for new homes but challenge the assumption that the Local Plan is sound: inaccurate modelling based on GL Hearne who cannot be considered to be impartial or objective. Therefore unsound. Unsubstantiated and outdated population projections contrary to government policy. Unsubstantiated and outdated employment projections. Inadequate infrastructure provision (network problems already exist) The removal of prime farming land. Significant increase to air pollution that will result at the Dunchurch crossroads – already higher than EU regulations state. Inadequate consideration has been given to government policy Appropriate brownfield including huge amount at RRS.		Independent consultants G L Hearn produced the SHMA and the subsequent updates for the entire Housing Market Area (HMA). Relevant consultations consistent with the town and country planning regulation 2012 and the council adopted SCI have been carried out in relation to this policy. The SHMA has been produced consistent to the requirements of the NPPF and NPPG and has been found sound by the Inspectors of the Warwick and Coventry Local plans EiPs. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary. It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. The interim measures of an additional lane at Dunchurch cross roads has been found to be acceptable following called in decision for land at Ashlawn Road west, Rugby, Warwickshire (ref: 3147448 - 10 July 2017).
1224	Angela Hussey	NA	NA	Local Plan	Delete policies no 50, 52, 9, 109 and 20; Local Plan needs re- examination- social housing and rentable properties needed, not 4 bodynam datashed homos		RBC has a target of 40% affordable housing- details to be finalised at Planning Application stage.

bedroom detached homes

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ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1317	F Veys	NA	NA	Local Plan	Request for extension to consultation period until 23rd December 2016. Grave impact of Local Plan on residents of Rugby due to scale of proposed developments. Council not published all the documents relevant to consultation at once on the 26th September. Cabinet offices guidelines are that consultations best practice are a minimum of 12 weeks. Size and lack of clarity of the consultation documents provided. Over 50 individual documents covering more than 3000 pages.		Relevant consultations consistent with the town and country planning regulation 2012 and the council adopted SCI have been carried out in relation to this policy.
1398	lan Bentlett	Harborough Magna Parish Council and Hill Street Youth and community center	NA	Local Plan	Not possible to make a full and comprehensive reply because much of the document is in "Council Speak" and uses jargon. Not positively prepared as no reference to need to maintain good communications with Northamptonshire and Leicestershire. Essential to ensure good and positive communication. This will ensure any developments which utilise the A5 receive the proper infrastructure consideration. No reference to this project. Not enough emphasis is placed on the current and future traffic flows on the A5 and the effect that increased HGV traffic having on villages north of our county near		DDC and NCC have not raised objections in relation to the Duty to Cooperate and have only commented on issues of soundness. Potential impacts of proposed development on wider road network has been assessed as part of the STA.

ID	Name Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response	
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					to the A5. No mention in the	
					document to this.	
1403	Sylvia Jacques	Thurlaston PC	NA	Local	Regarding Q1, The online system	Comments noted. Studies considered to
				Plan	requires an answer in order to	be robust and sound.
					proceed. Thurlaston PC does not	
					feel qualified to judge. "No" has	
					been entered in order to	
					proceed. Q2L TPC has no doubt	
					that the LP is unsound in all	
					areas. Reasons are fully discussed	
					in the response to the following	
					question. The changes necessary	
					are fully discussed in the	
					document e-mailed and posted to	
					the Town Hall. Data used is out of	
					date and needs to be routinely	
					assessed to ensure population;	
					migration and political factors are	
					continuously monitored and	
					introduced into the modelling of	
					the project. Re-examine vision for	
					the community. Use the correct	
					modelling, verification and	
					validation techniques. Listen to	
					those making representations to	
					RBC. Vast knowledge in	
					community with experience of	
					delivering major projects on time	
					and to budget.	

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1403	Sylvia Jacques	Thurlaston PC	NA	Local Plan	Thurlaston PC believes that the local plan is seriously flawed in many areas. Submission challenges all areas of the plan - the data, methodologies and validation and verification techniques. Plan would be returned straight back to investors in a business environment. Does RBC intend to do a risk assessment of this plan to identify the risks in terms of likelihood and consequence of using incorrect data and analysis? In all our interests that RBC spends much more time in the measurement and data collection phase.		Independent consultants G L Hearn produced the SHMA and the subsequent updates for the entire Housing Market Area (HMA). Relevant consultations consistent with the town and country planning regulation 2012 and the council adopted SCI have been carried out in relation to this policy. The SHMA has been produced consistent to the requirements of the NPPF and NPPG and has been found sound by the Inspectors of the Warwick and Coventry Local plans EiPs. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary.
1405	Tim Moore	Withybrook Parish Council	NA	Local Plan	Support Plan		Comments welcomed. No change.
1455	Louise Steele	Framptons	DB Symmetry, Taylor Wimpy, Gallagher Estates, Richboroug h Estates and Warwickshi re County	Local Plan	"further on-site requirements will be determined through the application of other relevant policies in this Local Plan" contrary to NPPF para 154 as does not indicate which policies	see above	Line has been included to relate to other policies or considerations within the plan. Not considered necessary to amend

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ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
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1462	Cllr Norman Lines	Thurlaston Parish Council	NA	Local Plan	Extra questions regarding population growth, migration, households, employment and Transport.	The SHMA has been produced consistent to the requirements of the NPPF and NPPG and has been found sound by the Inspectors of the Warwick and Coventry Local plans EiPs. Proposed alteration LP- 54.6 insert new para. After 4.7.Whilst some figures for individual local authorities change slightly, it is clear, at the HMA level that the assessed level of need in the UAoHN (and linked to 2012- based data) remains sound.
1489	D Ralph	NA	NA	Local Plan	In July 2016 RBC voted to proceed with Publication Draft of Local Plan without considering the responses received to Preferred Option draft.	A Local Plan Publication Draft Consultation Responses Summary was published for Council as part of a series of Full Council briefing sessions in advance of the Full Council decision.
1489	D Ralph	NA	NA	Local Plan	During Preferred consolation SARD and other argued for exclusion of Ashlawn Fields in SW Rugby proposals. Those arguments were not put to Council when it voted to produce Publication Draft, including Ashlawn Fields. A summary of responses to the Preferred Options was not produced until September 2016, and this summary neither referred to nor refuted the arguments advanced by SARD and others	All representation to the Preferred Options was considered in drafting the Publication draft Local Plan.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1492	D Mistry	NA	NA	Local Plan	Plans not taken into account amount of congestion as well as environmental impact, pollution and the amount of local services that will be needed for size of expansion. NPPF paras 30, 120, 124		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. STA has shown that proposed mitigation schemes reduce traffic flows through Dunchurch crossroads compared to the existing levels. It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1493	D Nutt	NA	NA	Local Plan	Plan does not recognise existing issues that will not be managed but made far worst by it. To avoid traffic congestion and air pollution and noise pollution (NPPF paras 30, 120, 123, 124), Destroys character of the village (NPPF 17, 58), Fails to provide necessary community facilities (NPPF 70), Threatens open spaces and country landscape (NPPF 57, 58, 69, 70, 73, 74, 109), Massively reduces agricultural land available and thus viability of farms and ignores their importance in our local history (NPPF 112, 126).		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. STA has shown that proposed mitigation schemes reduce traffic flows through Dunchurch crossroads compared to the existing levels. Proposed Appendix 3 Infrastructure Delivery Plan and DS9 have been amended following consideration of this consultation response and the updated Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124).It is acknowledged there will be loss of agricultural land however, this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1498	D R Daniel	NA	NA	Local Plan	Commercial Review: Plans call for huge population increase on basis of historical growth and extrapolation of a continuing trend. This will not happen if Brexit results in controls on immigration.		Consequences of Brexit on household projections not yet clear. Government maintains that local planning authorities must ensure continue working towards up to date adopted local plan. Household projections are the starting point for arriving at housing need.
1498	D R Daniel	NA	NA	Local Plan	Lack of Services		WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140.
1499	D Groom	NA	NA	Local Plan	Getting more difficult to live in Rugby area - travel around, doctors, shopping, work etc. Road network not capable of even managing amount of traffic now. Grid lock. Reduce development to cater for the present population not outsiders who have the money to buy four bedroomed houses. Rugby people who have jobs and cannot afford the deposit on a house so restrict any new houses to one or two bedrooms.		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. STA has shown that proposed mitigation schemes reduce traffic flows

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
							through Dunchurch crossroads compared to the existing levels. Proposed Appendix 3 Infrastructure Delivery Plan and DS9 have been amended following consideration of this consultation response and the updated Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124).WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage. Policy H1 informs housing mix.
1508	Dr F Somerset	NA	NA	Local Plan	In conclusion, plan is deeply flawed with proposed size of development, chosen sites and amenities. Plan risks damaging Rugby and Dunchurch irreversibly, and needs serious reconsideration and changes.		DS8 makes specific requirement of a buffer between Rugby and Dunchurch, which will be further detailed in the framework masterplan and adhered to in subsequent planning applications.

	ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
Г	1521	E Jones	NA	NA	Local	No explanation is given as to		Discussions with developers/landowners
	1021	Liones			Plan	what analysis has been		of existing sites benefiting from planning
					i iaii	undertaken to explore how		permissions have taken place to inform a
						delivery on existing		deliverable housing trajectory. These
						permissions/allocations could be		sites alone will not be sufficient to deliver
						accelerated, by measures such as		the housing target and a continuous 5
						early delivery of infrastructure. A		year land supply throughout the plan
						more focused delivery strategy		period. WCC Education and Highways,
						would make better use of existing		UHCW and CCG, and Highways England
						infrastructure and require less		have all been fully engaged in
						new infrastructure and would		development of the Local Plan and
						therefore have a higher chance of		infrastructure measures as contained
						increased delivery than the more		within IDP. None have raised objections
						'dispersed' approach that is being		to the plan. Detail of infrastructure to be
						suggested. There is no evidence		provided to support local plan growth is
						that increasing the supply of		contained in policies and the IDP which is
						allocations in the way proposed		a live document and has been updated at
						will actually increase delivery.		modifications LP54.116-140. Additional
								details will be finalised at the Planning
								Application stage. The previous
								development strategy focusing purely on
								allocating land for development within
								the Rugby Urban Area did not meet the
								housing delivery expected and therefore
								the development strategy seeks to
								allocate a more diverse range of sites

both in terms of size and location.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1521	E Jones	NA	NA	Local Plan	These proposals are ludicrous and unmanageable. This area is not able to sustain such planning and will devastate an area of beauty, history and interest. We need to promote Rugby and its surrounding villages to create tourism and interest not as a massive suburban area of no worth. People's lives are at risk and will be greatly changed from the effects of this unnecessary planning.		It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1521	E Jones	NA	NA	Local Plan	The Strategic Transport Assessment [STA] demonstrates that the Local Plan does not fully account for the transport impact arising from the proposed Lodge Farm allocation. The STA uses the Rugby Wide Area (RWA) S- Paramus micro-simulation model. Figure 1 of the STA shows the extent of the RWA network which is limited to Rugby town, DIRFT and a limited number of villages. It does not extend southwards along the A45 as far as the proposed Lodge Farm allocation. The plan makes passing reference to infrastructure requirements but provides no assurance that the needs of the development on this massive scale can be met (page 23). Past experience (e.g. Cawston) suggests that it takes a great deal of time to provide supporting infrastructure and services and that the impact of existing services and infrastructure is severely underestimated.		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation.

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1548	G Adams	NA	NA	Local Plan	Housing demand projections used are out of date.	Use housing forecasts based on projections taken after the 2007 financial crisis and post Brexit vote.	Independent consultants G L Hearn produced the SHMA and the subsequent updates for the entire Housing Market Area (HMA). The SHMA has been produced consistent to the requirements of the NPPF and NPPG and has been found sound by the Inspectors of the Warwick and Coventry Local plans EiPs. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1555	G Mills	NA	NA	Local Plan	Not considered options fully. Neither sustainability nor infrastructure considered in a sensible manner. Ignored use of green belt guidance over use of agricultural land and should check guideline in a more sensible manner.		Independent consultants G L Hearn produced the SHMA and the subsequent updates for the entire Housing Market Area (HMA). Relevant consultations consistent with the town and country planning regulation 2012 and the council adopted SCI have been carried out in relation to this policy. The SHMA has been produced consistent to the requirements of the NPPF and NPPG and has been found sound by the Inspectors of the Warwick and Coventry Local plans EiPs. The achievements of the plan are considered to be consistent with the requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary. It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1555	G Mills	NA	NA	Local Plan	Not considered options fully. Neither sustainability nor infrastructure considered in a sensible manner. Ignored use of green belt guidance over use of agricultural land and should check guideline in a more sensible manner.		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. STA has shown that proposed mitigation schemes reduce traffic flows through Dunchurch crossroads compared to the existing levels. It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1581	H Marsh	NA	NA	Local Plan	Plan would significantly increase traffic flowing around Dunchurch village centre. Crossroads and surrounding infrastructure will not be able to cope. This was evidenced when an alternative route into Rugby from the A45 was closed due to roadworks and additional traffic came through the village 0 there were traffic jams taking up to 20 mins to get through the traffic lights. This will increase pollution levels in the centre of the village, especially at a time when children are passing through too got to school.		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. The interim measures of an additional lane at Dunchurch cross roads has been found to be acceptable following called in decagon for land at Ashlawn Road west, Rugby, Warwickshire (ref: 3147448 - 10 July 2017).

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1586	Michael Koch	Marton Parish Council (Chair)	NA	Local Plan	With a view towards the Rugby Plan Consultation phase, Marton Parish Council would like to emphasise that there is no immediate need for further local housing in our community. This has also been established in our most recent Housing Needs Survey, which was carried out by independent experts. The Parish Council team would be concerned about any proposals to develop surrounding green belt land for private dwellings or business. In addition, any further development would also increase road traffic within the village.		No change required. The justification of Coventry City's unmet housing need is borne out of the work undertaken at the HMA level by all HMA authorities. The report to the Coventry, Warwickshire and South West Leicestershire Shadow Economic Prosperity Board in September which accompanied the Memorandum of Understanding details the research and cooperation between the six planning authorities with responsibility for planning for housing need, as well as Warwickshire County Council, that determined the level of unmet need from Coventry and how this is distributed to the shire authorities. This is further reinforced by the Inspector of the Coventry City Local Plan accepting the evidence demonstrating the capacity of Coventry in meeting its own housing need. This approach and the MoU have also been accepted by the inspector of Warwick's local plan. The IDP is a live document and has been updated Modification LP54.116-140. Discussions with developers/landowners of existing sites benefiting from planning permissions have taken place to inform a deliverable housing trajectory. These sites alone will not be sufficient to deliver the housing target and a continuous 5 year land supply throughout the plan period. Therefore further allocatied sites were informed by the SHLAA which assessed suitability and deliverability of

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
							greenfield and brownfield sites, and other relevant evidence, proposed allocation contained within the development strategy represents the most sustainable strategy and the housing allocations ensure a continuous flexible supply of housing to meet the housing target. DS8 enables the delivery of the Spine Road and other infrastructure requirements to ensure the comprehensive development of the allocation. DS8 will require sustainable transport measures therefore reducing the reliance on the private car. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. The Council has not received a DTC objection from Coventry City Council or Daventry District Council. The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan, which are contained within the modification IDP.
1586	Michael Koch	Marton Parish Council (Chair)	NA	Local Plan	With a view towards the Rugby Plan Consultation phase, Marton Parish Council would like to emphasise that there is no immediate need for further local		The SHMA has been produced consistent to the requirements of the NPPF and NPPG and has been found sound by the Inspectors of the Warwick and Coventry Local plans EiPs. Independent

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housing in our community. This	consultants G L Hearn produced the
has also been established in our	SHMA and the subsequent updates for
most recent Housing Needs	the entire Housing Market Area (HMA).
Survey, which was carried out by	Relevant consultations consistent with
independent experts. The Parish	the town and country planning regulation
Council team would be	2012 and the council adopted SCI have
concerned about any proposals	been carried out in relation to this policy.
to develop surrounding green	The SHMA has been produced consistent
belt land for private dwellings or	to the requirements of the NPPF and
business. In addition, any further	NPPG and has been found sound by the
development would also increase	Inspectors of the Warwick and Coventry
road traffic within the village.	Local plans EiPs. The achievements of the
	plan are considered to be consistent with
	the requirements of the NPPF and the
	evidence which informs the Local Plan.
	Therefore no amendments considered
	necessary. It is acknowledged there will
	be loss of agricultural land however; this
	is the case for all of the proposed
	allocations as there is extremely limited
	brownfield capacity as demonstrated in
	the SHLAA. The STA June 2017 updated
	the September 2016 STA by increasing
	the modelled area so that it extends
	south to the of the A45 and into Daventry
	DC, it has incorporated updated travel to
	work assumption, junction counts and
	queue surveys, to identify the strategic
	transport infrastructure to support the
	Local Plan. The measures contained
	within the IDP and DS9 informed by the
	STA mitigate the impacts of the SW
	Rugby allocation.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
ID .658	Name Jonathan Marlow	NA	Client NA	-	Object to local plan for a number of reasons: - Do not regard housing projections to be accurate as I believe population predictions and housing demand are vastly overstated. - Do not believe it is appropriate for our local area to take on obligations of Coventry when there are appropriate sites identified in their region. - Concerned about urban sprawl to south of the town; brownfield sites across Rugby and adjacent to large infrastructure that are more suitable - Inadequate infrastructure plan	legally compliant or	RBC Response The selection of sites as informed by the SHLAA, and other relevant evidence, for proposed allocation contained within the development strategy represents the most sustainable strategy and the housing allocations ensure a continuous supply of housing to meet the housing target. A MoU distributes the OAN across the HMA to ensure it is met within the HMA. Although NBBC are not signatories of the MoU, RBC is of the view, from limited inspection of NBBC evidence that NBBC can deliver their contribution of the OAN as identified within the MoU. Assessments have been made of Dunchurch Crossroads to consider the potential impact of new development.
					 Road network around Dunchurch is already under strain and not cope with additional housing, long delays at crossroads at peak times. Concerned RBC are seeking to exploit financial benefits from building without fully anticipating or providing local services 		

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1659	James Cernan	NA	NA	Local Plan	Object to local plan, with main reasons being: - Company that compiled data for		Independent consultants G L Hearn produced the SHMA and the subsequent updates for the entire Housing Market
					the plan do not appear to be independent as have acted on behalf of developers - Pollution levels at Dunchurch crossroads are extremely high and increased traffic from the plan would only increase this. Congestion at Dunchurch crossroads and at junction of Rugby Rd and Bilton Lane. Traffic levels through Dunchurch would increase due to proposal at Lodge Farm - Rugby should not have to provide housing allocation for Coventry as in a different County Council area - As UK has voted to leave the EU there will be reduction in number of migrant workers from the EU resulting in a decreased housing demand - Need to keep farming land to provide housing on brownfield sites		Area (HMA). Consequences of Brexit on household projections not yet clear. Government maintains that local planning authorities must ensure continue working towards up to date adopted local plan. Household projections are the starting point for arriving at housing need. All relevant statutory consultees engaged and assessments undertaken where appropriate.
1702	Joy Deacon	NA	NA	Local Plan	Strongly object to local plan and cannot understand why there is so much emphasis on increased housing development as no proven need for the vast increase. Scandalous to build masses of houses on prime agricultural land, should consider building high rise flats on		The justification of Coventry City's unmet housing need is borne out of the work undertaken at the HMA level by all HMA authorities. The report to the Coventry, Warwickshire and South West Leicestershire Shadow Economic Prosperity Board in September which accompanied the Memorandum of Understanding details the research and
ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
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					brownfield sites to meet apparent shortages.		cooperation between the six planning authorities with responsibility for planning for housing need, as well as Warwickshire County Council, that determined the level of unmet need from Coventry and how this is distributed to the shire authorities. This is further reinforced by the Inspector of the Coventry City Local Plan accepting the evidence demonstrating the capacity of Coventry in meeting its own housing need. This approach and the MoU have also been accepted by the inspector of Warwick's local plan. No alteration proposed. All sites proposed are required to maintain a 5 year land supply throughout the plan period. Makes provision for a larger housing land supply relative to its identified requirement, much of this is linked to longer term infrastructure investment and part of large urban extension sites which will remain developable beyond the Plan period. It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
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1717 .	Jamie Roberts	NA	NA	Local Plan	Poorly thought through, bad planning and no infrastructure		Independent consultants G L Hearn produced the SHMA and the subsequent updates for the entire Housing Market Area (HMA). Relevant consultations consistent with the town and country planning regulation 2012 and the council adopted SCI have been carried out in relation to this policy. The SHMA has been produced consistent to the requirements of the NPPF and NPPG and has been found sound by the Inspectors of the Warwick and Coventry Local plans EiPs. The achievements of the plan are considered to be consistent with the
1730	John Foster	NA	NA	Local Plan	There are currently many empty residential and commercial properties in Rugby so building additional properties is not justified and does not address how the current properties could be redeployed. Twice the area has been allocated for B8 warehousing than is necessary to meet requirements. Models used for housing requirements are not updated frequently enough and are sensitive to changes with massive effects on predictions. Another area which has been poorly modelled in the Local Plan is traffic flows. The last six years	Review and amend plan to a more realistic nature	requirements of the NPPF and the evidence which informs the Local Plan. Therefore no amendments considered necessary. The justification of Coventry City's unmet housing need is borne out of the work undertaken at the HMA level by all HMA authorities. The report to the Coventry, Warwickshire and South West Leicestershire Shadow Economic Prosperity Board in September which accompanied the Memorandum of Understanding details the research and cooperation between the six planning authorities with responsibility for planning for housing need, as well as Warwickshire County Council, that determined the level of unmet need from Coventry and how this is distributed to the shire authorities. This is further reinforced by the Inspector of the

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have demonstrated that delivery	Coventry City Local Plan accepting the
is around 100 dwellings per year	evidence demonstrating the capacity of
below that needed to meet the	Coventry in meeting its own housing
plan. Implementing the plan will	need. This approach and the MoU have
lead to traffic chaos, increased	also been accepted by the inspector of
pollution and increased risk to	Warwick's local plan. No alteration
safety of personnel. Land	proposed. Independent consultants G L
between Rugby, Dunchurch and	Hearn produced the SHMA and the
Cawston is very valuable,	subsequent updates for the entire
containing good quality	Housing Market Area (HMA). Relevant
landscape, productive farmland	consultations consistent with the town
and ancient woodland that are	and country planning regulation 2012 and
well used for recreation. The	the council adopted SCI have been
setting of the ancient woodland	carried out in relation to this policy. The
at Cawston Spinney would be	SHMA has been produced consistent to
irreparably damaged. Regarding	the requirements of the NPPF and NPPG
the employment site at SW	and has been found sound by the
Rugby, there will also be	Inspectors of the Warwick and Coventry
increased noise, light and air	Local plans EiPs. The achievements of the
pollution from the large number	plan are considered to be consistent with
of day and night truck journeys in	the requirements of the NPPF and the
and out of the development, as	evidence which informs the Local Plan.
well as the cars.	Therefore no amendments considered
	necessary. It is acknowledged there will
	be loss of agricultural land however; this
	is the case for all of the proposed
	allocations as there is extremely limited
	brownfield capacity as demonstrated in
	the SHLAA. The delivery of the South
	West spine road is a necessity
	infrastructure requirement to support
	the delivery of the Local Plan. There is
	nothing before the Council that would
	suggested that the road will not be
	delivered.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1744	Kate Aluze - Ele	NA	NA	Local Plan	Development on the scale proposed for the South West of Rugby does not stand up and in no way justifies the loss of countryside required. This area is a valuable open space in the increasingly urban landscape and is valuable agricultural land (NPPF para.112), currently used as such, with cattle and sheep grazing on the land. This area provides a valuable rural landscape that links Cawston Woods and the pathways that link down to Draycote Water. I see many runners, walkers, and horse riders using this land. Therefore they should be protected as valuable open spaces and public rights of way in line with NPPF para.74-76. I do not believe that the development proposed can be justified whilst developers are not taking advantage of the planning permission that has already been granted, greater consideration should be given to accelerating the development of brownfield sites before committing so much countryside to housing. I have concerns about the projected figures for housing need in Rugby specifically, as these are based on out-dated information and appear to have been arbitrarily added to. I	Delete Policy DS8	It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1745	Karen & Roger	NA	NA	Local	believe draft policy DS8 is unsound as it is inconsistent with National Planning Policy Framework paragraph 30 on reducing traffic congestion and paragraph 124 on air quality. Object to the impact the	Delete Policy DS8	The STA June 2017 updated the
	Dent			Plan	additional traffic caused by 5000 new houses to the South West of Rugby will have on Dunchurch. The air pollution levels at the Dun Cow crossroads will be exacerbated greatly. Believe Policy DS8 is unsound as it is not consistent with NPPF paras. 30 and 124		September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1746	Kevin & Susan Riches	NA	NA	Local Plan	Object to proposed local plan with concerns around transport, infrastructure, health and education - areas we have found difficulty obtaining information. Believe the development will destroy village life, community spirit and the protected historic environment and Dunchurch will lose its character. We accept chronic shortage of housing and those homes need to be built around the UK. We also accept that a certain number of homes need to be built in our area in order to support economic growth. However, we do not accept the proposal for such a		Comments noted - No action required.
					accept the proposal for such a large scale development		

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1938	Sinead Turnbull	DLP Planning	Sinead Turnball	Number Local Plan	The agent is promoting a site off Lower Street, Willoughby. The Housing target and Distribution Background Paper December 2015 identifies opportunities for sustainable extensions to rural settlements. Site located outside the Willoughby settlement boundary. Was previously rejected as was within the setting of a Listed Building and flood risk was identified. Rural Sustainability Study of November 2015 gives Willoughby a score of 21/25 therefore can accommodate new housing development. The policy of Local Needs Settlements has resulted in villages stagnating as new development has been constrained. Developing infill sites witan villages can increase		All sites submitted to the council through the SHLAA call for sites have been considered against the same SHLAA methodology to identify the most suitable, available and achievable, deliverable and developable.
					sustainability by increasing services within the village and also helping to sustain services in nearby villages.		

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
2008	Martin Hackley	NA	NA	Local Plan	Plan has not been prepared with due consideration to the quality of life for the local residents.		It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. DS8 makes specific requirement of a buffer between Rugby and Dunchurch, which will be further detailed in the framework masterplan and adhered to in subsequent planning applications. The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. STA has shown that proposed mitigation schemes reduce traffic flows through Dunchurch crossroads compared to the existing levels.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
2029	Nicholas Glasheen	NA	NA	Local Plan	Concerns expressed in relation to loss of countryside, impact of development on natural environment, losing historical connections due to sprawling warehousing, Rugby not utilising its heritage, town centre declined, increased congestion and associated issues of pollution, potholes and increased carbon footprint, strain on local services such as Doctors surgery's, dentists and schools but also Council services themselves, lack of community engagement and the Council implementing the local residents wishes, values of market town need to be revitalised and market town status needs to be maintained, RBC has failed to attract new businesses to the town centre and there is a lack of retail provision,	No further development required as market town character being eroded, more focus should be on the town centre, land used for out of town retail parks should be used as park and rides, utilise historic assets more	It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. The interim measures of an additional lane at Dunchurch cross roads has been found to be acceptable following called in decision for land at Ashlawn Road west, Rugby, Warwickshire (ref: 3147448 - 10 July 2017).WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
2034	Natalie Judge	NA	NA	Local Plan	Concern in relation to existing and future pollution levels. Proposals of a disproportionate size and lack of appropriate infrastructure		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140.
2098	Lorne Smith	NA	NA	Local Plan	All large developments between M6, A5 and A426 should be banned to prevent Rugby's coalescence with Lutterworth.		Proposed allocations to the North of the town (Coton Park East and existing Gateway allocation are south of the M6) and proposed development at Coton House will not encroach North beyond existing development at Coton House.

ID	Name	Organisation	Client	Policy Number	Summary of Representation
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2140	Unni Henning	NA	NA	Local	Inadequate road provision due to	The STA June 2017 updated the
				Plan	outdated traffic modelling;	September 2016 STA by increasing the
					destruction of rural amenity	modelled area so that it extends south to
					before other options have been	the of the A45 and into Daventry DC, it
					exhausted; plan derived for the	has incorporated updated travel to work
					benefit of developers and does	assumption, junction counts and queue
					not benefit Rugby; Local Plan	surveys, to identify the strategic
					contrary to NPPF framework 2:	transport infrastructure to support the
					plan goes beyond objectively	Local Plan. The measures contained
					assessed need, no flexibility to	within the IDP and DS9 informed by the
					take into account effects of	STA mitigate the impacts of the SW
					Brexit, no regard for local	Rugby allocation. Consequences of Brexit
					population, no regard for	on household projections not yet clear.
					conservation of local	Government maintains that local
					environment or reducing	planning authorities must ensure
					pollution; proposed industrial	continue working towards up to date
					development in South West will	adopted local plan. Household
					lead to more HGV traffic, paved	projections are the starting point for
					surfaces will increase flooding,	arriving at housing need. DS8 is almost
					few jobs per square metre as	entirely within flood zone 1, with an
					warehouses are so automated,	extremely small area of flood zone 2. The
					warehouses contrary to existing	Local Plan is supported by a Flood Risk
					landscaping, several logistics	Assessment. The Local Lead Flood
					parks to North of Rugby- no	Authority will be a consultee at
					proven need for warehousing in	application stage and will require at this
					South West and road access to	stage appropriate management of any
					North or West inadequate, low	surface flooding on the consistent with
					paid low skills jobs not in keeping	SDC5. No change recommended. It is
					with Rugby's technical history of	acknowledged there will be loss of
					highly skilled engineering jobs- no	agricultural land however; this is the case
					career for future Rugby citizens,	for all of the proposed allocations as
					coalescence between Cawston,	there is extremely limited brownfield
					Dunchurch and Rugby- South	capacity as demonstrated in the SHLAA.
					West will destroy approach into	
					town, data and modelling used is	
					flawed and should be	
					nation and should be	

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
ID	Name Victoria Foster	Organisation	NA	-	Summary of Representation independently evaluated- facts have been made to fit the story rather than being objectively assessed, DS8 contrary to Thurlaston Conservation Area; works to listed buildings require 'jumping through hoops' yet the environment around them can be destroyed; DS8 not based on sound evidence; many empty commercial properties throughout Rugby; twice the area required has been allocated for B8 warehousing- GL Hearn expects 95% of jobs to be related to warehousing which is unrealistic; housing models ill- conceived and not updated frequently enough; uncertainty around economy and migration- the market assessment acknowledges the uncertainty but ignores it; annual housebuilding rates of past 6 years 100 homes short of meeting the plan so the required building rates would never be achieved; overestimate of	legally compliant or	RBC Response
					required housing forcing loss of green space unnecessarily; a new road network is deemed essential yet no infrastructure will be built until 30% of the homes are completed- in the interim this will lead to an inferior road network;		provision for a larger housing land supply relative to its identified requirement, much of this is linked to longer term infrastructure investment and part of large urban extension sites which will remain developable beyond the Plan period.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
					community cannot understand why Rugby is taking some of Coventry's housing numbers- Coventry is signed up to the WMCA, Rugby is not so sees no financial benefit; logistics of implementation with multiple developers responsible for infrastructure will lead to increased congestion, pollution and road safety issues; traffic flows poorly modelled as they are inaccurate and outdated- good practice requires continual updating as small changes in traffic assumptions can dramatically affect outputs; coalescence between Cawston, Dunchurch and Rugby will result in the loss of valuable green space containing ancient woodland, good quality landscape and productive farmland; Coventry Road will become increasingly busy due to the proposed warehousing with as many as 1,840 parking spaces (3 times as much as Elliot's Field)resulting in flooding, air, noise and light pollution;	sound	

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
2163	Rekha Mistry	NA	NA	Local Plan	Believe that the local plan has not taken into account the amount of congestion it is going to cause as well environmental impact, pollution and the amount of local services that will be needed for this size of expansion NPPF paragraph 30, 120,124		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
2206	Steve Woodford	NA	NA	Local Plan	Articles in the Local Press intended to encourage people to object to the plan, especially proposed developments around Bilton, Dunchurch, Grandborough and Onley giving the impression that most people are opposed to these developments which might not be a true reflection of the people of Rugby; there is considerable development to the East of Rugby so there should be no further development around Clifton-Upon-Dunsmore; concerns expressed in relation to	sound	Comments noted. There are no sites allocated for Clifton-Upon-Dunsmore. Potential road traffic impacts of proposed development on wider road network has been assessed as part of the STA. WCC Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional
					increased traffic volumes around Rugby especially Butlers Leap, Clifton Road, Mill Road, Technology Drive, Leicester Road and Newbold Road; need for		details will be finalised at the Planning Application stage.

increased healthcare provision, shoppers and businesses must be encouraged into the town centre as it is in decline; understanding that transport and health not controlled by Rugby Borough but RBC needs to ensure considerable improvements to health and transport infrastructure before developments commence.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
2210	Russell Crow	Barton Willmore	Consortium made up of several leading national house builders and developers with interests across the Coventry and Warwickshi re Housing Market Area (HMA).	Local Plan	BW OAN responds to more recent 2012-based CLG household projections & up to date employment forecasts. ONS 2012-based SNPP significantly underestimates international migration at national level. Demographic-led need is better represented by the long-term net-migration trend, resulting in a requirement for 4,918 dpa across the HMA (assuming a full return to 2008-based household formation rates in age bands 25 – 44). Cites approach taken by KCC to arriving at economic growth forecasts, as a reasonable approach as seeks to predict what might happen to activity rates in the future updated approach to economic activity rates, it will be necessary to provide for 6,297 dpa across the HMA to meet job growth of 94,500. at least 5,005 dwellings per annum / 100,100 dwellings in total across the HMA during the Plan period 2011-2031.indicates a shortfall in the full, objective assessment of housing need across the HMA of at least 14,660 dwellings when compared against the most recent update to the joint SHMA of September 2015 of 4,272 dpa / 85,440 dwellings in total.	Full OAN for HMA should be reviewed in light of more recent evidence in order to ensure that the Plan is based on a sound evidence base prior to submission for Examination, and that the associated implications of meeting the increased unmet need can be fully planned for by the remaining authorities within the HMA through the Duty to Cooperate.	Proposed Appendix 3 Infrastructure Delivery Plan and DS8 have been amended following consideration of this consultation response and the updated Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124).

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
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2225	Barrie Bemand	NA	NA	Local Plan	SHMA does not take account of Brexit referendum therefore not sound or justified -figures could therefore reduce. Employment allocation not located in the right location. Land between A45.B4429 has gravel and should be therefore protected for possible under the Warwickshire County Council Mineral Strategy. Development here whether housing or employment will prevent future extraction. Development in the Bilton Cawston to Dunchurch will have significant effects on the environment which the local plan only pays lip service to - with the signifcant increase in traffic air pollution will increase; areas of greenspace will shrink reducing their protective effects. Highway improvement not mentioned for Blue Boar junction with the B4453 & junction with A4071 lengthy queues of traffic already occur. Avon Mill junction of the A426 traffic already backs up at non peak times no mentions of improvements in the Local Plan.	There is a need to improve the road infrastructure outside the development areas. The Avon Mill junction, the junction of Western Relief Road with the A45 need action now not after the event. A rational decision of which areas are developed for industry/employment should be made upon the present areas adjacent to the M1/M6/Leicester Road / A5 & DIRFT with its good rail links. Better protection of the environment with increased preservation of green spaces to provide the "Lungs of Rugby" Improvement in access to & from the Leicester Road shopping areas needs to be planned which will reduce congestion & pollution. There needs to be joined up thinking how this local plan interacts with or effects other local & national strategies eg	Consequences of Brexit on household projections not yet clear. Government maintains that local planning authorities must ensure continue working towards up to date adopted local plan. Household projections are the starting point for arriving at housing need. The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA.
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ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
						Warwickshire County Council Minerals Plan, Highway development, Rail infrastructure HS2, Education & the National Health Service	
						both Hospital & Primary Healthcare.	

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
2243	Christine Alllen Short	NA	NA	Local Plan	This plan will contribute to a vast increase in traffic. Traffic is heavier at peak times but does continue throughout the night, the large Lorries are not only noisy but are so heavy that they shake the houses. All this despite the creation of the bypass road which we were promised would alleviate the situation. Should the proposed building plans go ahead the traffic will increase to an unacceptable and unhealthy level. It is untrue to say that the creation of the southwest link road will ameliorate the problem as the excessive housing and warehousing proposals will create far more extra traffic, add to these developments at Ashlawn Road, Rugby Road and Willoughby the roads will be chaotic. Our hospitals, schools and GP surgeries are already overloaded to a life threatening extent.		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. The interim measures of an additional lane at Dunchurch cross roads has been found to be acceptable following called in decision for land at Ashlawn Road west, Rugby, Warwickshire (ref: 3147448 - 10 July 2017).WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is
							a live document and has been updated at

a live document and has been update modifications LP54.116-140.

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1019	Dr J R Ponsford	NA	NA	Local Plan	Accepted that requirements of Paris Agreement are themselves inadequate to achieve the aim to cap global mean temperature rise to 2 degrees C, even though commitment to electric vehicles and phasing out of gas for cooking. The investment to provide any of this and the necessary renewable energy generating capacity, storage and distribution, let alone in just over 17 years is clearly massive. It will need to be accompanied by realistic efforts to help other countries, particularly with education, reduction in child mortality and encouragement of greater choice in limiting family size, at the same time educating ourselves likewise, sufficiently to adopt a gradual, peaceful, reduction in population size necessary to begin to match the Earth's depleting resources and halt the exploitation that continues to accelerate man made greenhouse gas emissions. Major contingency funds seem necessary to cope as climate change increases flooding and threatens our own food output directly or by increasing infestations. Major contingency funds seem necessary to cope as climate change increases flooding		Local Plan proposals for growth formulated on basis of Objectively Assessed Need. Policies have been included in relation to climate change and flooding. Comments noted although not considered to affect soundness of plan.

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					and threatens our own food output directly or by increasing infestations. Spending on new houses, warehouses and infrastructure will divert resources encourage further population growth and expropriate even more land abroad to feed us, acceleration the existing threat of mass global species extinction within decades and to man and to civilisation if global food output falls consistently below demand, prompting massive migrations. Sir David Attenborough's letter regarding population growth needs a proper response if we are to value survival of offspring and continued global enjoyment of the planet		

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1521	E Jones	NA	NA	Local Plan	The need for the Local Plan to comply with the National Planning Policy Framework regarding boosting the supply of housing is recognised. However, the plan does not justify why provision needs to be made on a greenfield site in a location outside of its development strategy to locate 1500 dwellings from Coventry's housing allocation. Bearing in mind no justification has been given in the Memorandum of Understanding as to why Rugby Borough Council are proposing to build 2800 dwellings in total from Coventry's housing allocation.		No change required. The justification of Coventry City's unmet housing need is borne out of the work undertaken at the HMA level by all HMA authorities. The report to the Coventry, Warwickshire and South West Leicestershire Shadow Economic Prosperity Board in September which accompanied the Memorandum of Understanding details the research and cooperation between the six planning authorities with responsibility for planning for housing need, as well as Warwickshire County Council, that determined the level of unmet need from Coventry and how this is distributed to the shire authorities. This is further reinforced by the Inspector of the Coventry City Local Plan accepting the evidence demonstrating the capacity of Coventry in meeting its own housing need. This approach and the MoU have also been accepted by the inspector of Warwick's local plan. The IDP is a live document and has been updated Modification LP54.116-140. Discussions with developers/landowners of existing sites benefiting from planning permissions have taken place to inform a deliverable housing trajectory. These sites alone will not be sufficient to deliver the housing target and a continuous 5 year land supply throughout the plan

period. Therefore further allocations are required. The selection of the allocated sites were informed by the SHLAA which assessed suitability and deliverability of

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							greenfield and brownfield sites, and other relevant evidence, proposed allocation contained within the development strategy represents the most sustainable strategy and the housing allocations ensure a continuous flexible supply of housing to meet the housing target. Lodge farm, which will become a new main rural settlement, will ensure that the Local Plan has a portfolio of sites in size and location to help maintain a five year land supply throughout the course of the plan. The delivery of the South West spine road is a necessity to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. The Council has not received a DTC objection from Daventry DC or Northampton CC The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan, which are contained within the modification IDP.