

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
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Key	
	Added 23.11.17
	Added 6.12.17
	Added from another policy

1406	Julie Warwick	Wolvey Parish Council	NA	H1	<p>Policy refers to market housing and requires a mix of house types and sizes in order to help address local housing needs and demands. Older people and first time buyers are specifically mentioned in relation to housing need within this policy. Housing mix will be informed by SHMA , Borough's Housing Needs SPD and future updates. Clearly these can include housing needs surveys and other information gathering undertaken by Parish Councils, for example as part of a neighbourhood plan. Recent feedback from the Neighbourhood Plan consultation has identified a need for smaller properties that are suitable for younger people and those who are retired/and/or elderly/infirm, rather than larger family homes. This will be considered further, along with additional evidence, within the emerging Neighbourhood Plan, to guide future housing development in Wolvey. The Parish Council therefore supports Policy H1 and</p>		Support noted. No further action required.
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					paragraphs 5.8 and 5.11 of the Local Plan.		
1496	D Charles-Edwards	NA	NA	H1	New housing must also be sustainable. Little or no carbon footprint. 9 possible elements for sustainable housing listed e.g. Acton Energy website. Scale of Plan extremely destructive to the sense of community in Thurlaston, only 300m from Conservation Area. Also needs to indicate what jobs other than warehousing is to be part of Rugby's future.		New housing to meet Building Regulations on sustainability. The Local Plan seeks to allocate 110 hectares of employment land based on a number of factors identified within the evidence base such as average rates of past employment land take-up. Employment mix is informed by the Employment studies contained within the evidence base. Impact on Conservation Area would be assessed as part of any future Planning Application with any appropriate mitigation measures identified.
1524	E Palmer	NA	NA	H1	Strategic location for housing should be rethought and located next to employment areas and with easy access to primary highway routes such as Ansty Park. This would be a much more appropriate location for DS8 and DS10 and provide for Coventry overspill at the same time.		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.

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1536	Elizabeth Reeves	NA	NA	H1	<p>I understand that the proposed plan at Symmetry Park allows for 875 jobs but 1840 car park spaces have been allowed. This is quite a discrepancy so I can only assume that one of these figures is incorrect. The proposed development is only 300 metres from Thurlaston Conservation area. Symmetry Park with freight lorries coming and going especially during the night will increase noise, light and air pollution. How is this enhancing, protecting and sustaining our Conservation area?</p>		<p>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).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.</p>

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1869	Michael O'Connell	Amec Foster Wheeler	Warwickshire County Council	H1	Object to Policy H1 as consider it overly prescriptive and will be out of date if the evidence base is not reviewed periodically. Without flexibility in the application of the housing mix, this will not enable developers to respond to market demand and local market conditions.	Policy should enable flexibility to diverge from the SHMA housing mix in certain circumstances or where market conditions dictate this would be appropriate.	SHMA is considered to be a robust document that details the required housing in Rugby over the plan period. Use of SHMA is in accordance with the requirements of Paragraphs 50 and 159 of the NPPF. Supporting text also includes reference to consideration of future SHMA updates commissioned by the Council and also updated Housing Needs SPD. Amendments to policy not considered necessary.
1875	Michelle Simpson-Gallego	Pegasus Planning	AC Lloyd / Persimmon	H1	Concern that as there is no requirement to review the SHMA, the baseline information informing the policy may become out of date. SHMA has reviewed housing mix on a Borough wide basis which does not consider locational differences. Important that policy remains flexible and mix is determined on a site by site basis rather than imposing a blanket policy requirement.		SHMA is considered to be a robust document that details the required housing in Rugby over the plan period. Use of SHMA is in accordance with the requirements of Paragraphs 50 and 159 of the NPPF. Supporting text also includes reference to consideration of future SHMA updates commissioned by the Council and also updated Housing Needs SPD. Amendments to policy not considered necessary.
1875	Michelle Simpson-Gallego	Pegasus Planning	AC Lloyd / Persimmon	H1	Concern that as there is no requirement to review the SHMA, the baseline information informing the policy may become out of date. SHMA has reviewed housing mix on a Borough wide basis which does not consider locational differences. Important that policy remains flexible and mix is determined on a site by site basis rather than imposing a blanket policy requirement.		SHMA is considered to be a robust document that details the required housing in Rugby over the plan period. Use of SHMA is in accordance with the requirements of Paragraphs 50 and 159 of the NPPF. Supporting text also includes reference to consideration of future SHMA updates commissioned by the Council and also updated Housing Needs SPD. Amendments to policy not considered necessary.

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1936	Stephen Mair	Andrew Granger	The Shirley Family	H1	The allocation of more than one residential site would allow for a greater housing mix. Promote land to the South of Rugby Road, Brinklow. Any development would include a range of types and size of housing, including affordable housing, and be situated around extensive areas of open space.	The 100 dwellings allocated should be distributed across more than one site	The selection of the allocated sites were informed by the SHLAA which assessed suitability and deliverability of greenfield and brownfield sites, and other relevant evidence. The 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.
1940	Michael Burrows	Savills	Legal and General	H1	H1 needs sufficient flexibility and to set out where it would be appropriate to deviate from the SHMA. Policy H1 states "new residential development should contribute to the overall housing mix in the locality, taking into account current need, particularly for older people and first time buyers, current demand and existing housing stock"- This information is not included in nor is consistent with the latest SHLA- which is ambiguous and not compliant with the NPPF.	Suggested alternative wording (in italics): "The Council will consider an alternative mix in the following circumstances where it is clearly demonstrated how the delivery of a mix has regard to the SHMA, or relevant update, is compromised: <ul style="list-style-type: none"> · Where the shape and size of the site precludes the delivery of a mix of housing; · The location of the site, for example sustainable and very accessible sites within or close to Rugby town centre or the train station; · Sites with severe development constraints where the housing mix may impact on viability, where 	SHMA is considered to be a robust document that details the required housing in Rugby over the plan period. Use of SHMA is in accordance with the requirements of Paragraphs 50 and 159 of the NPPF. Supporting text also includes reference to consideration of future SHMA updates commissioned by the Council and also updated Housing Needs SPD. Amendments to policy not considered necessary.

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						<p>demonstrated through submission of a viability appraisal;</p> <ul style="list-style-type: none"> Where a mix of housing would compromise the ability of the development to meet a specifically identified affordable or specialist housing need; <i>Where a mix of housing would compromise the ability of the development to meet an identified local need for market housing or would not take account of the overall housing mix in the locality or existing housing stock;</i> Conversions, where the characteristics of the existing building prohibit a mix to be delivered; and <i>or</i> <i>Where market signals and market trends support an alternative housing mix”.</i> 	

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2102	Martyn Colledge	NA	NA	H1	Rugby should not be taking some of Coventry's Housing allocation. Formula used to calculate housing numbers insufficient.		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. No alteration proposed.
2109	Louise Steele	Framptons	DB Symmetry, Taylor Wimpey, Gallagher Estates, Richborough Estates and Warwickshire County Council	H1	First Paragraph of Policy H1 states "To deliver a wide choice of high quality market homes across the Borough residential development proposals must form a mix of market housing house types and sizes consistent with the latest Strategic Housing Market Assessment". Para 5.10 sets out the 'latest' SHMA housing mix. No evidence to support the Plan on the	The Parties recommend that Policy H1 is amended to add an additional bullet point to state ' where the evidence of the SHMA is shown not to be consistent with the latest market signals, or evidence of need or local demand '	SHMA is considered to be a robust document that details the required housing in Rugby over the plan period. Use of SHMA is in accordance with the requirements of Paragraphs 50 and 159 of the NPPF. Supporting text also includes reference to consideration of future SHMA updates commissioned by the Council and also updated Housing Needs SPD. Amendments to policy not considered necessary.

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					<p>implications of imposing a specific market housing mix on the viability and deliverability of development, contrary to NPPF Paragraphs 173 and 174 of the Framework. Not possible therefore to comment on whether the policy is consistent with the Framework. H1 too rigid in recuing specific housing mix consistent the latest SHMA. Evidence will become dated in lifetime of plan. No timetable for when it will be reviewed and updated. Policy therefore needs to allow proper flexibility to deal with circumstances where the evidence of the SHMA does not reflect the latest market signals, or evidence of need. Moreover, the policy makes no allowance for consideration of local demand as required by para 50 NPPF.</p>		
2120	Michelle Simpson-Gallego	Pegasus Group	Peter Drakesford	H1	<p>Concern that the SHMA data may become outdated, with no requirement to review it. SHMA reviewed housing mix on a borough wide basis, rather than a locational basis- which may affect dwelling delivery on individual sites.</p>		<p>SHMA is considered to be a robust document that details the required housing in Rugby over the plan period. Use of SHMA is in accordance with the requirements of Paragraphs 50 and 159 of the NPPF. Supporting text also includes reference to consideration of future SHMA updates commissioned by the Council and also updated Housing Needs SPD. Amendments to policy not considered necessary.</p>

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1316 & 1458	Meghan Rossitier (Elaine Elstone)	Tetlow King	Rent Plus	H1	Policy H1 is not considered to be suitably effective over the longer term and should be amended as below to enable consideration of any more recent evidence of housing need (or national policy) when determining planning applications	“To deliver a wide choice of high quality market homes across the Borough residential development proposals must form a mix of market housing house types and sizes consistent with the latest Strategic Housing Market Assessment <i>and any other up to date evidence of housing need such as a local housing needs survey.</i> ”	SHMA is considered to be a robust document that details the required housing in Rugby over the plan period. Use of SHMA is in accordance with the requirements of Paragraphs 50 and 159 of the NPPF. Supporting text also includes reference to consideration of future SHMA updates commissioned by the Council and also updated Housing Needs SPD. Amendments to policy not considered necessary.

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1909	Paul Hill	RPS	St Modwen	H1	<p>This policy, setting out a recommended mix of housing within residential developments is generally supported however a few amendments to the text should be included as follows:</p> <p>1. This policy initially requires the housing mix of new development to be consistent with the latest SHMA; however it then goes on to give a number of instances where a different mix would be considered acceptable. It is appropriate for the wording of the policy to give suitable flexibility to allow either a mix consistent with the SHMA, or a justified alternative mix to be provided.</p> <p>2. The first bullet point should be amended to remove “preclude”. There could be instances where a different mix is simply more appropriate for the site or location and the policy should be positively worded to recognise this.</p> <p>3. Paragraph 5.10 includes the SHMA recommended Mix of Market Housing in the Borough. This should only be the Housing Needs SPD as this document will be updated more regularly</p>	<p>Policy H1: Informing Housing: Mix Make changes bar the removal of the SHMA mix table</p> <p>1. The first paragraph should be amended as follows: To deliver a wide choice of high quality..... latest Strategic Housing Market Assessment <u>where possible</u> .</p> <p>2. The first bullet point should be amended as follows:</p> <ul style="list-style-type: none"> · where the shape, and size <u>and location</u> of the site precludes justifies the delivery of a mix of housing; <p>3. Paragraph 5.10 of the supporting text should be removed</p>	<p>SHMA is considered to be a robust document that details the required housing in Rugby over the plan period. Use of SHMA is in accordance with the requirements of Paragraphs 50 and 159 of the NPPF. Supporting text also includes reference to consideration of future SHMA updates commissioned by the Council and also updated Housing Needs SPD. Amendments to policy not considered necessary.</p>

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2119 & 2121	Michelle Simpson-Gallego	Pegasus Group	Lioncourt Homes	H1	There is no requirement to review the SHMA, so the data may become outdated and given its prepared on a Housing Market Area wide basis, the authority has less control over when the assessments will be revised. The SHMA reviewed housing mix on a borough-wide basis and does not consider locational differences, which may influence dwelling provision on individual sites. Housing mix should be decided on a site-by-site basis rather than a blanket requirement.		SHMA is considered to be a robust document that details the required housing in Rugby over the plan period. Use of SHMA is in accordance with the requirements of Paragraphs 50 and 159 of the NPPF. Supporting text also includes reference to consideration of future SHMA updates commissioned by the Council and also updated Housing Needs SPD. Amendments to policy not considered necessary.
2120 & 2159	Michelle Simpson-Gallego	Pegasus Group	Peter Drakesford	H1	Concern that the SHMA data may become outdated, with no requirement to review it. SHMA reviewed housing mix on a borough wide basis, rather than a locational basis- which may affect dwelling delivery on individual sites. Important that the policy remains flexible and housing mix is determined on a site by site basis depending on the needs of arising households and considering the mix in that particular location as opposed to imposing a blanket policy requirement.		SHMA is considered to be a robust document that details the required housing in Rugby over the plan period. Use of SHMA is in accordance with the requirements of Paragraphs 50 and 159 of the NPPF. Supporting text also includes reference to consideration of future SHMA updates commissioned by the Council and also updated Housing Needs SPD. Amendments to policy not considered necessary.

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361	R Hannis	NA	NA	H1	<p>Does not provide for a proper provision for Self-Build - Self Build and Customs Act 2015. Large areas of agricultural land allocated in plan but no smaller sites. Purpose of this tool to increase rate of housing supply by stimulating this method. LPAs must meet requirements and facilitate private land to bring forward plots. Local Plan should include provision and flexibility. Whilst provision is made for large sites provision must also be made for small boundary changes in small villages of well-designed development. This is consistent with many different government initiatives.</p>	<p>Suggest including the following wording: "The Custom & Self Build Housing Act 2015 The Council recognises the need to raise awareness of the above in the public domain in order to comply with government targets in this sector and also to allow/variation/relaxation of planning constraints particularly in individual and small proposals by self-build applicants, the only criteria being adjacent availability of public highway access and service utilities. Whilst the council may be able to make sites available from their own land holdings and also make provision for including self-build in larger developments the council also recognises that many applicants would have preference for a particular location to meet their personal needs.". Also suggest including wording "The</p>	<p>There is a requirement for the Council to find suitable planning permissions for entrants on the register; however this is not justification for granting permissions on sites that are contrary to local and national planning policy. Not considered necessary for soundness of plan to amend the policy as described.</p>

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						<p>Council recognises the need to raise awareness, promote and facilitate these Acts in order to achieve Government targets in this sector, and to comply with this legislation in carrying out their planning duties. Whilst the Council may be able to make sites available from their own land holdings and also make provision for inclusion of self-build in larger developments, it will also be necessary to grant permission on private land to meet the self-builders preferences of plot size and location, in accordance with the Acts."</p>	
361	R Hannis	NA	NA	H2	<p>H1 not compatible with Self Build and Custom Act 2015; RBC has duty to promote sites for self-build not just large allocations; settlement boundaries should be amended to allow appropriate development; RIBA has produced a report 'Housing Matters; 20 ways to tackle the housing crisis' which highlights the role of self-</p>		<p>Local Plan is considered compliant with national regulations; Policy H1 takes self-build into account; potential for self build on selected sites;</p>

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					build; details provided on the Scottish self-build system; overview provided of self-build system;		
410	Peter Burfield	NA	NA	H2	Local Plan not in conformity with 2015 Self Build and Housing Act and 2016 Housing and Planning Act as only reference is on Page 37 where it is stated large developments should include some self-build provision; LPAs should identify specific areas for self-build to be in conformity with the Acts; further details provided of the Act and government policy; Council could release land it owns for development;		Council-owned land is limited; necessity for potential applicants to identify suitable sites;
1314	Sue Green	Home Builders Federation	NA	H2	Affordable housing targets should be informed by a whole plan viability assessment this should be made available prior to submission to SoS		Plan has been subject to viability assessment which has been submitted as evidence.
1314	Sue Green	Home Builders Federation	NA	H2	Refers to a Housing Needs Supplementary Planning Document and the NPPF is explicit that an SPD should not add to the financial burden of development (para 154). The Regulations are equally explicit in limiting the remit of an SPD so that policies dealing with development management cannot be hidden in an SPD.		Main policy text amended to refer to latest SHMA data (see LP54.63). SPD intended to provide additional guidance on policy and not be burdensome to developers.

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1316	James Durrant	Tetlow King	HARP Consortium (Bromford Housing Group, Orbit Heart of England Housing Association , Midlands Heart Limited and Waterloo Housing Association Ltd)	H2	Further viability work is needed to ensure that the affordable housing requirement set out within Policy H2 is realistic and achievable when considered in conjunction with other policies in the plan as a whole. Securing the highest achievable level of affordable housing on sites should be a priority over other more luxury type requirements relating to a higher standard of water consumption for instance	Robust viability evidence may also demonstrate ability for higher percentages of affordable housing across the region or in areas of the region.	Plan has been subject to viability assessment and submitted as evidence. Further assessment not considered to be required.
1406	Julie Warwick	Wolvey Parish Council	NA	H2	Whilst the Parish Council appreciates the potential for viability issues when re-developing brownfield sites (which can adversely affect developer contributions) the existing provision of affordable housing in Wolvey is very low. Census data indicates a provision of 6.6% in the Parish compared to 15.3% (Rugby Borough); 19.7% (West Midlands) and 18.5% (England). Local indications from recent consultation suggest that more affordable housing is needed, however further work is required to inform the actual level of need. Affordable housing should be integrated with market housing to achieve an inclusive	Policy H2 and for the reasons referred to in paragraph 3.15 a change is suggested as follows: After "The mix of units within this percentage of provision must be in compliance with guidance contained within the Housing Needs SPD" add the words "unless further, up-to-date evidence of local housing need exists, identified through a relevant Neighbourhood Plan in place, or a Parish Plan. Concomitantly it is	Paragraph referred to in main text of policy has been amended to refer to latest SHMA guidance (see mod LP54.63). Use of SHMA in accordance with Paragraphs 50 and 159 of NPPF. Reference in supporting text to consideration of evidence available at the time of application. Not considered necessary to make further alterations.

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					<p>and mixed community. Whilst the Parish Council generally supports H2 it is considered that it should include reference to up-to date local evidence which will inform local needs on a site specific basis rather than the 'one size fits all' nature of a Borough-wide policy and SPD which is now 4 years old. When such evidence is demonstrated in a neighbourhood or Parish Plan it should be given due weight. Minor changes are therefore suggested in Section 4 below in the form of additional text to provide clarity.</p>	<p>suggested that the final sentence of paragraph 5.17 be amended as follows: "...and evidence of local circumstances, as set out in a relevant Neighbourhood or Parish Plan."</p>	
1530	Dr Edmund Hunt	NA	NA	H2	<p>Overall I believe there is a lack of transparent information, notably the fact that prospective logistics developments that may support the South West Expansion have not been articulated or mentioned. Objectives - would support Economic objective 4 for no over reliance on logistics DS5 - defines strategic housing areas >100 but Coton House is at 100 yet this site meets very few of the criteria for 100 above even though it is so close to a strategic development (sceptically convenient?!). I appreciate a line has to be drawn but Coton House does little to meet sustainable development objectives and</p>	<p>Ensure transparency of call to action for development sites Be more thorough and committed to how you will ensure the success of Rugby Town Centre It is disappointing that, within your duty to cooperate, I am not aware of you informing adjacent Parish Councils, whose residents use rugby, about the consultation more actively. Also see previous comments.</p>	<p>South West a proposed allocation-landowners are able to promote land outside of the Local Plan process. The Local Plan seeks to allocate 110 hectares of employment land based on a number of factors identified within the evidence base such as average rates of past employment land take-up. Employment mix is informed by the Employment studies contained within the evidence base. 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. Coton House has been subject to an SA. The STA June 2017 updated the September 2016 STA by increasing the modelled area so</p>

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					<p>there should be limits to any further development at Coton House to mitigate against it becoming a large scale development with no sustainable benefits. DS8 - With strategic objective to not rely on logistics, there appears contradictions with the proposed Symmetry Park application near Dunchurch. Considerations need to be given to how this development would invest in the local road network to support the entry to South West Rugby and mitigate against Dunchurch travel flow. ED2 - Support this and would request the policy goes further to ensure that large scale logistics developments close to the town would be closely considered by RBC. The policy therefore needs to ensure Rugby and its Local Plan have influence on Magna Park and any prospective developments, notably 6.12 and the proximity of employment land to residential areas given the lack of close, viable residential amenity to Magna Park H2 - Do not agreed given the prospective increase in logistics in SW Rugby. Would suggest an increased proportion of affordable housing in particular at any sites close to employment land (e.g. New</p>		<p>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.</p>

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					<p>South West Rugby to accommodate potential logistics expansion for lower income employees) TC3 - not quite clear how this prioritisation of retail allocation will be delivered in reality - the current trend for rugby (and many other) citizens is for out of town convenience, therefore RBC will receive developer interest for large scale retail areas. Should a policy not focus on limiting out of town allocation, in other words, categorised between in town and out of town TC3 - I could not clearly understand how the local plan is going to commit or ensure improvements are made to the town centre. Surely a call for sites, or at least evidence of a similar process, should be done to transparently identify the town centre long term plan and sustainable future according to NPPF. D1 - some evidence behind to validity / success of Travel Plans and the rationale for including them should be provided as there is very mixed success of them D1 - it appears slightly surprising there is not a specific or clear policy that identifies key strategic routes around Rugby (e.g. A45 / A426) and how these need to be</p>		

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					assessed an invested in as the Town grows significantly in the coming years. There is little emphasis on driving new technologies or lower carbon emission transport infrastructure to support a cleaner, quieter, safer town centre and surrounding traffic routes.		
1869	Michael O'Connell	Amec Foster Wheeler	Warwickshire County Council	H2	Consider policy is unsound as not sufficiently flexible in terms of responding to the changing needs of affordable housing as advised in NPPF para.50.	Policy should be able to respond to changing market conditions over time as needs may change over the plan period.	SHMA used to inform policy and provides most suitable data, in accordance with NPPF paragraphs 50 and 159. Reference in supporting text to evidence available at the time. Not considered necessary to make amendments to policy for soundness of plan.
1875	Michelle Simpson-Gallego	Pegasus Planning	AC Lloyd / Persimmon	H2	Welcomed that policy requirement for affordable housing has been lowered to reflect arising affordable households as a proportion of all households. This could further change particularly as housing supply becomes more aligned with demand. Sites should be considered on an individual basis and affordable housing requirement should not be applied as a blanket percentage. SHMA has reviewed housing mix on a Borough wide basis which does not consider locational differences. Policy does not include consideration of low cost starter homes. Should be flexible		Policy sets what is considered a suitable and justified target to "be sought". Provision is made within the policy that affordable housing below target levels may be acceptable if evidence concerning financial viability is provided and also updated Housing Needs SPD. Descriptions of affordable housing in accordance with NPPF.

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					<p>enough to accommodate a wider array of affordable housing products.</p>		
1907	Martin Herbert	Brown & Co	Edward Walpole Brown	H2	<p>We challenge the mix and split of 84% social/ affordable rent and 16% intermediate products. There should be a much higher proportion of intermediate housing (shared ownership) and insufficient regard has been placed on the need to facilitate starter homes as part of the balance. This is mentioned in 5.18 but this should also be reflected in 5.17. 5.17 could be amended by deleting the second sentence and in its place indicating that the split of the housing will be in accordance with requirements at the time, taking into account the need for the relevant proportions of social/ affordable rent, intermediate housing (shared equity) and starter homes. The actual requirement for each scheme can then be negotiated on the strength of that because that is likely to change over time and particularly in the absence of any specific guidance on starter homes at the moment save for the recent announcement relating to Brownfield sites. Further announcements are, we believe, proposed and may well</p>		<p>Figures are based on SHMA and considered most suitable for use in accordance with paragraphs 50 and 159 of the NPPF. Updated Housing Needs SPD can be referred to where appropriate.</p>

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					be made by the time the plan reaches the Public Inquiry.		
1940	Michael Burrows	Savills	Legal and General	H2	<p>Policy H2 identifies that the mix of units should be in accordance with the guidance in the Housing Needs SPD. NPPF states that policies should take into account changing market conditions. The current housing needs SPD is based on 2008 SHMA data, whilst Paragraphs 5.13-5.18 of the Local Plan make reference to national guidance, these provisions are not included in the 2012 SPD. Policy H2 needs to be sufficiently flexible to allow for the latest evidence in relation market to trends, local and national policy. The suggested lower affordable housing target for Rugby is considered appropriate as Rugby will be taking some of Coventry's housing need. Reserve the right to comment pending further updates on the starter homes policy and following the submission of a viability assessment.</p>	<p>“The mix of units within this percentage of provision must be in compliance with guidance contained within the Housing Needs SPD, unless local demand, market trends, a more up to date SHMA or changes in Government Policy justify an alternative mix”.</p>	<p>SHMA is considered to be a robust document that details the required housing in Rugby over the plan period. Use of SHMA is in accordance with the requirements of Paragraphs 50 and 159 of the NPPF. Supporting text also includes reference to consideration of future SHMA updates commissioned by the Council and also updated Housing Needs SPD. The supporting text of H2 details the housing mix as identified in the SHMA. Amendments to policy not considered necessary.</p>

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	Michael Burrows	Savills	Legal and General	H2	<p>Policy H2 identifies that the mix of units should be in accordance with the guidance in the Housing Needs SPD. NPPF states that policies should take into account changing market conditions. The current housing needs SPD is based on 2008 SHMA data, whilst Paragraphs 5.13-5.18 of the Local Plan make reference to national guidance; these provisions are not included in the 2012 SPD. Policy H2 needs to be sufficiently flexible to allow for the latest evidence in relation market to trends, local and national policy. The suggested lower affordable housing target for Rugby is considered appropriate as Rugby will be taking some of Coventry's housing need. Reserve the right to comment pending further updates on the starter homes policy and following the submission of a viability assessment.</p>	<p>“The mix of units within this percentage of provision must be in compliance with guidance contained within the Housing Needs SPD, unless local demand, market trends, a more up to date SHMA or changes in Government Policy justify an alternative mix”.</p>	<p>Main text of policy altered to refer to SHMA (see mod LP54.63). Housing Needs SPD to be updated on adoption of the plan. Not considered suitable to make other amendments referring to other factors.</p>
2064	Peter Wilkinson	Salisbury Investments Ltd	R Galey	H2	<p>Concerns in relation to a lack of clarity in the application of the policy. Whilst it is acknowledged further details will be provided in the Housing Needs SPD it is unclear if H2 should apply to C2 uses e.g. self-contained extra care accommodation units- which should not be liable to contribute to affordable housing as it is not a</p>	<p>H2 should be amended: "Affordable housing should be provided on all sites of at least 0.36 hectares in size or capable of accommodating 11 (net) dwelling units or more (including conversions and subdivisions). The</p>	<p>Not considered necessary to specify that C2 will not be applicable in policy. Definition of use classes considered in individual schemes.</p>

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					C3 use and is designated specialist housing. Concerns in relation to viability as extra-care units have additional costs- which could affect housing delivery. No viability assessment to demonstrate that affordable housing requirement is deliverable.	requirement will not apply to developments where the accommodation falls within Class C2 (Residential Institutions) of the Use Classes Order."	
2150	Michelle Simpson-Gallego	Pegasus Group	Lioncourt Homes	H2	The affordable housing requirement should be applied on a site-by-site basis, rather than a blanket requirement. When the inflexible Community Infrastructure Levy is adopted, affordable housing may be the only obligation which can be varied to make a development viable. The affordable housing provision does not include consideration of low cost homes- it is considered that the policy be flexible enough to accommodate a wide array of affordable housing products.		Policy sets what is considered a suitable and justified target to "be sought". Provision is made within the policy that affordable housing below target levels may be acceptable if evidence concerning financial viability is provided.

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	Michelle Simpson-Gallego	Pegasus Group	Lioncourt Homes	H2	The affordable housing requirement should be applied on a site-by-site basis, rather than a blanket requirement. When the inflexible Community Infrastructure Levy is adopted, affordable housing may be the only obligation which can be varied to make a development viable. The affordable housing provision does not include consideration of low cost homes- it is considered that the policy be flexible enough to accommodate a wide array of affordable housing products.		Policy sets what is considered a suitable and justified target to "be sought". Provision is made within the policy that affordable housing below target levels may be acceptable if evidence concerning financial viability is provided.
121	D Shaw	NA	NA	H2	Affordable Housing needs careful definition. The affordability level by definition would need to be a high salary and low expenditure in order to sustain own transport. Now virtually no public transport here and a largely executive housing estate would be unable to sustain possible provision. What provision is planned and secured by whom?		Policy H2- Affordable Housing Provision states: "Affordable housing should be provided on all sites of at least 0.36 hectares in size or capable of accommodating 11 (net) dwelling units or more (including conversions and subdivisions). On previously developed sites a target affordable housing provision of 20% will be sought. On green field sites a target affordable housing provision of 30% will be sought." Final details to be finalised during Planning Application process.

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1316 & 1458	Meghan Rossitier (Elaine Elstone)	Tetlow King	Rent Plus	H2	Additional policy cannot be set within supplementary planning guidance, and the Housing Needs SPD should only be referred to in Policy H2 as guidance.	<p>“The mix of units within this percentage of provision must be in compliance with <u>should take account of the</u> guidance contained within the Housing Needs SPD, <u>as well as evidence of local housing need and aspirations, as set out in the SHMA or other local housing needs surveys.</u>”</p> <p>The policy statement “Further details of requirements are contained in the Housing Needs SPD which should be read in conjunction with this policy” should also be amended to be clear that the SPD guidance is just that, changing ‘requirements’ to ‘expectations’.</p>	Paragraph referred to in main text of policy has been amended to refer to latest SHMA guidance (see mod LP54.63). Use of SHMA in accordance with Paragraphs 50 and 159 of NPPF. Reference in supporting text to consideration of evidence available at the time of application. Not considered necessary to make further alterations.

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1316 & 1458	Meghan Rossitier (Elaine Elstone)	Tetlow King	Rent Plus	H2	Policy H2 should also be updated to reflect the known and anticipated changes to national planning policy which we expect to be set out within the Housing White Paper this month. We expect this to include changes to national policy to include Starter Homes and Rent to Buy as part of the definition of affordable housing. We recommend that to be compliant with emerging policy and effective over the lifetime of the Plan a further statement is added, noting that innovative tenures, such as rent to buy, which assist households out of inappropriate housing into home ownership, will be supported. This should also be taken into account at paragraph 5.13 which should include Rent to Buy alongside Starter Homes.	Paragraph 5.13 which should include Rent to Buy alongside Starter Homes.	White Paper includes proposed changes to affordable housing definitions, however this was not available at time of plan preparation and the proposals have not been agreed and inserted into guidance. As such alterations to the plan in line with this document are not considered justified.
1316 & 1458	Meghan Rossitier (Elaine Elstone)	Tetlow King	Rent Plus	H2	Paragraph 5.17 helpfully references the expectation that national policy on affordable housing is due to be amended, but does not refer to Rent to Buy alongside Starter Homes. As Rent to Buy could meet a significant level of need in Rugby, helping remove households from social rented and affordable rented properties, as well as private rented sector accommodation, it should be supported by the	“...The final mix achieved on any site will be informed by the up-to-date position set out in the Housing Needs SPD, <u>any updates to this and up to date evidence of local need</u> , which shall take into account any change to the definition of affordable housing established via national guidance, any	Housing Needs SPD to be updated on adoption of the local plan. Supporting text describes how where variance of the detail in the SPD considered necessary, an updated Housing Needs SPD will be produced. Not considered necessary to make amendments.

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					<p>Council. Recent developments of Rent plus homes elsewhere in England have freed up existing homes for households in greater need - one Plymouth scheme is now occupied with over 30% of families coming from social rented properties.</p> <p>The Housing Needs SPD was adopted in 2012 and is not up to date. More appropriate wording is recommended:</p>	<p>relevant site specific issues and evidence of local circumstances.”</p>	
1316 & 1458	Meghan Rossitier	Tetlow King	Rent Plus	H2	<p>The statement at paragraph 5.18 is unhelpful. It may be more useful for the Council to set out how it intends to amend the Local Plan in anticipation of changes expected to occur through national policy, or instead to note that changes are expected that will require review of the Plan. The Council should set out a commitment to reviewing its housing policies in response to changes in national policy, preferably within a set timescale to give certainty to everyone concerned with the Plan.</p>		<p>Paragraph only intended for guidance and not considered suitable to go into detail about potential changes that may be forthcoming.</p>

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1316 & 1458	Meghan Rossitier	Tetlow King	Rent Plus	H2	We support the Council's intention, as set out at paragraph 5.22, to review the SHMA regularly, and to provide up to date guidance in the Housing Needs SPD on the general approach to requiring affordable housing following such reviews. Whilst the SPD cannot define policy, and the Plan should incorporate full details of how it will support delivery of Rent to Buy homes in Rugby, it would be useful for an update to be conducted on the SPD as soon as practicable after the release of the White Paper.		Comments noted. Housing Needs SPD to be updated on adoption of Plan. No further action required at this time.
852 & 2261	D Creery	NA	NA	H2	Where in the plan is there consideration and recommendation for the proportion of affordable housing, or is this left to the builders and developers to decide?		Local Plan policy H2 Affordable housing should be provided on all sites of at least 0.36 hectares in size or capable of accommodating 11 (net) dwelling units or more (including conversions and subdivisions). On previously developed sites a target affordable housing provision of 20% will be sought. On green field sites a target affordable housing provision of 30% will be sought. The mix of units within this percentage of provision must be in compliance with guidance contained within the Housing Needs SPD. The target levels will be expected to be provided unless the local planning authority is satisfied by robust financial viability evidence that development would not be financially viable at the relevant target level. Such

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							evidence will be required to be submitted with the planning application to justify any reduced levels of affordable housing provision proposed for assessment using an open-book approach and may be subject to independent assessment (e.g. by the District Valour Services or equivalent).
1399	Dr Jo Reed Johnson	Pailton Parish Council		H3	This policy has been abused and has provided houses in open countryside, to its detriment. More thought and stricter policy is required to challenge need e.g if need could not be met by the use of temporary accommodation, e.g. static home.		Policy relating to a permanent home (subject to the criteria) is in accordance with aims of national policy. Policy is considered most suitable method of achieving this without being overly flexible.
1452	Public Health Warwickshire	Public Health Warwickshire		H4	If rural sited social housing is to be built, developers should prove that the housing will be serving those who work in local, rural jobs to justify it. Otherwise good public transportations would be required to link residents to employment and services. Policies H1-H6 does not state a requirement for CHS or BREEAM. It should be energy efficient with adequate insulation and ventilation installed		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. Warwickshire County Council are putting together a Public Transport Strategy. No change to Policies

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1539	Fran Fuller	NA	NA	H4	<p>Proposed plan will destroy the landscape, threatening birds, mammals and invertebrates that normally inhabit the area. It is an unnecessary over development of this area. Doctors' surgeries are already full to capacity, our hospital has been downgraded even though the University Hospital of Coventry and Warwickshire. I believe draft policy DS8 is unjustified. I also believe greater consideration should be given to accelerating the development of brownfield sites before committing so much countryside to housing. Therefore the local plan should be improved by dropping this policy.</p>		<p>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. 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.</p>

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1865	Peter Frampton	Framptons Town Planning	Barry Gamble	H4	<p>Policy H4, as written, has an internal conflict with its provisions, and is considered inflexible in the definition of the term 'Affordable Housing'. The description of Affordable Housing being 'Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market' lacks the flexibility to respond to the 'direction of travel' in the scope of Affordable Housing. Conflict in the criteria of the policy criteria c and the allowance of small proportion of open market housing allowed to deliver significant affordable housing where viability is a constraint. Policy H4 is that it is unduly restrictive to the circumstances where an element of open market housing may be introduced. The planning circumstances envisaged by the Framework are where it would facilitate the provision of significant additional affordable housing. No reference is made to issues of viability. The Framework 173 adequately deals with matters relating to viability – which may be applicable to all forms of development including affordable housing.</p>	<p>Reword Policy H4 I) Change (c) to read: 'The development consists exclusively of affordable housing or includes some market housing where it would facilitate the provision of significant additional housing to meet local needs.' ii) Delete final paragraph iii) Amend Glossary to refer to Affordable Housing as being: 'The meaning of Affordable Housing as set out within Annex 2 of the Framework.'</p>	<p>Main aim of policy is to seek that development consists exclusively of affordable housing, however provision is also included in policy to allow small proportion of market housing to facilitate this. Final paragraph in accordance with para 54 NPPF as relating to local needs. Policy has been formulated in relation to legislation at that time and has been considered suitable. Amendments not considered to be required. Glossary has been amended to include reference to affordable rented (see MiM LP54.180) however not considered necessary to make further alterations. Glossary is also intended to illustrate term within the plan and not direct to a separate document for guidance.</p>

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1316 & 1458	Meghan Rossitier	Tetlow King	Rent Plus	H4	<p>Policy H4 is inconsistent with national planning policy and should be amended to enable the delivery of rural exception sites that meet all local housing needs. Point a) should not require the need for affordable housing to 'outweigh other policy considerations', whilst point b) is entirely inappropriate, forcing developers to undertake a sequential test on the delivery of rural exception site schemes. This is an unnecessary burden on developers seeking to meet local housing needs; as rural exception schemes are already one of the more financially difficult developments to deliver it is important that the Council seek to enable rather than stifle delivery. Point c) should also be removed as national planning policy allows a proportion of such schemes to include open market homes in order to cross-subsidise delivery. National planning policy also sets a lower threshold than that set out at point d), by requiring that developments do not have a significant, adverse impact on the character or appearance of an area. This point should be amended to reflect this national policy approach. Point e) is reasonable in the current policy</p>	<p>We recommend that this point is amended to read: <u>"In the case of social and affordable rented dwellings, all cases</u> arrangements for the management and occupation of dwellings must be made to ensure that <u>these all dwellings provided</u> will be, and will remain available for occupancy by eligible local people at an affordable cost and at a range of tenures, both initially and in perpetuity."</p>	<p>Other policy considerations are referred to as development may have significant impacts and would otherwise be contrary to planning policies. Considered reasonable that alternative sites within settlement are explored first due to impacts on countryside/green belt when developing beyond settlement boundary. Main aim of policy is to seek that development consists exclusively of affordable housing, however provision is also included in policy to allow small proportion of market housing to facilitate this. Policy has been formulated in relation to legislation at that time and has been considered suitable. Amendments not considered to be required.</p>

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					<p>context, but we ask that it be reviewed to reflect the emerging approach to delivery of affordable housing. Starter Homes is now defined as affordable housing under the Housing and Planning Act 2016; this model is not to be retained in perpetuity and the Government has set out its intention to support Rent to Buy as a model that will not be required to be retained in perpetuity. Similarly, intermediate affordable homes are not retained in the longer term due to household's stair casing to full ownership.</p>		

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1316 & 1458	Elaine Elstone	Tetlow King	HARP Consortium (Bromford Housing Group, Orbit Heart of England Housing Association , Midlands Heart Limited and Waterloo Housing Association Ltd)	H4	<p>Policy too tightly drawn and will place an undue burden on such schemes coming forward. In particular, the following bullet point:</p> <p>“It is demonstrated no suitable alternative sites exist within the defined settlement boundary”</p> <p>The requirement for schemes to meet this criterion is overly onerous and also too vague. There is no definition as to what is a “suitable” site. A site could be identified but it might not be deliverable or developable in terms of the definitions of those words given in the NPPF but it is unclear whether this site would still be considered “suitable” under this policy. The NPPF also does not require a sequential site search as set out here, and we strongly suggest that this is removed as this is not justified, inconsistent with national policy and renders the policy unsound.</p>	Remove requirement to identify suitable alternative sites within the defined settlement boundary.	NPPF para 55 describes how rural exception sites should be included where appropriate. Considered reasonable that potential alternative sites within settlement are considered due to impact on countryside/green belt when developing beyond settlement boundary.
1462	Thurlaston Parish Council	NA	NA	H5	Questions the percentage of new build which is affordable housing. Questions the percentage of new build will be Social Housing/hostels for the homeless.		Policy H2 details affordable housing provision with a target of 20% on previously developed sites and 30% on greenfield sites.

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1540	F Gee	NA	NA	H5	<p>RBC is prepared to obliterate all of this. Existing highway safety issues, proposals would increase volume of traffic. Existing pollution levels, increase in traffic and risk to health of children. Traffic and HGVs cause house to shake. Where are children of new houses going to be educated? Where will my daughter get high school education? Don't need more new houses in the area. Construction already underway on hundreds of houses in Rugby. Concentrate on redeveloping the town centre. Surely all of the empty shops could be converted into housing. Please consider impact these houses and infrastructure will have on the future and the future of our children.</p>		<p>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.</p>

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1314	Sue Green	Home Builders Federation	NA	H6	The Council should provide further clarity on the meaning of its statement in para 5.46 of the supporting text which proposes to count C2 residential care institutions towards the housing requirement. If the Council is proposing to include C2 uses in the HLS then it is recommended that the housing need for C2 bed spaces should also be identified as a separate element of the housing requirement in Policy DS1		Paragraph has been deleted for clarification (mods LP54.64). C2 uses do not contribute to housing target.
1314	Sue Green	Home Builders Federation	NA	H6	Re-consider if the supporting text in para 5.47 referring to self-build dwellings is most relevant to Policy H6 – Specialist Housing or Policy H1 – Housing Mix.		Paragraph would be more suited to H1. Statement to be provided for examination.

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1406	Julie Warwick	Wolvey Parish Council	NA	H6	<p>This policy sets out the considerations for care homes, retirement housing and other specialist accommodation. Larger developments should include opportunities to include such housing. Additionally, 'general' housing that may be suitable/adaptable for older people. Such as smaller bungalows, can meet the needs of those wishing to live independently for as long as possible. Many residents in Wolvey have expressed a desire to move to a smaller home within the village which would be more suitable for their needs and would free up a larger property designed for family living. Furthermore the lack of specialist retirement/care home accommodation has also been raised by villagers via the recent neighbourhood plan consultation. The Parish Council therefore support policy H6 and paragraphs 5.40 and 5.44.</p>		Support noted. No further action required.

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1875	Michelle Simpson-Gallego	Pegasus Planning	AC Lloyd / Persimmon	H6	<p>Unclear what is meant by 'large developments' and 'meeting the needs of older persons'. Residential care homes are a niche development that should be led by the market. Council should provide flexible policy to allow providers/developers of specialist care homes to determine viability. Important requirement to allow people to live independently in own homes for as long as possible remains flexible so as not to impact on viability and overall delivery of housing.</p>		<p>Not considered suitable to include a specific threshold. "Large scale" is a term used in the NPPF e.g. para 38). No specific age set in policy although supporting text describes older people as over 55.</p>
1911	Peter Wilkinson	Salisbury Investments Ltd	R Galey	H6	<p>Policy inconsistent with NPPF Paragraphs 50 and 159. H6 should not seek to restrict the location of specialist housing to settlement boundaries or allocated housing sites- but make a case-by-case assessment based on access to services etc.- as it could affect viability. Relying on large housing sites for delivery may be overly-optimistic. Policy should be flexible given there is no specific housing allocation for older people.</p>		<p>Not a specific restriction on location included in the policy. Other policy considerations relating to location would still be applicable nonetheless. Individual details can be considered in an application, however not considered justified to alter policy.</p>

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2149	Michelle Simpson-Gallego	Pegasus Group	Peter Drakesford	H6	Policy does not define 'large developments' or 'meeting the needs of older persons'. A flexible policy is required.		Not considered suitable to include a specific threshold. "Large scale" is a term used in the NPPF e.g. para 38). No specific age set in policy although supporting text describes older people as over 55.
2149	Michelle Simpson-Gallego	Pegasus Group	Lioncourt Homes	H6	Policy around old persons housing is unclear in terms of its definitions of 'large developments' and 'meeting the needs of older persons'. The policy on design to enable people to live independently must remain flexible or it will affect viability thus affect delivery.	The policy should clarify the number of dwellings to be delivered within the plan period.	Not considered suitable to include a specific threshold. "Large scale" is a term used in the NPPF e.g. para 38). No specific age set in policy although supporting text describes older people in terms of being over 55.
1106	David Joseph	Bloor Homes		H1 & H2	Policies ought to provide flexibility as to site specific evidence of mix,. For example, Thame Neighbourhood Plan requires a Thame specific response to size and types of market houses which is a more refined response to individual proposals	Additional bullet point to H1: "where site specific evidence provides justification for a different mix". Add to H2: "or where a specific site mix is identified by a registered provider"	Considered that the criteria as outlined in the policy are sufficient to detail the circumstances where an alternative housing mix can be provided. Not considered necessary to make further adjustments.
2121	Michelle Simpson	Pegasus Group		H1,H2 & H6	There is no requirement to review the SHMA, so the data may become outdated and given it's prepared on a Housing Market Area wide basis, the authority has less control over when the assessments will be revised. The SHMA reviewed housing mix on a borough-wide basis and does not consider locational differences, which may influence dwelling provision on		The representations highlight concerns relating to the soundness of the plan which need to be explored through the oral part of the examination.

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					individual sites. Housing mix should be decided on a site-by-site basis rather than a blanket requirement.		