

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

1119	Ross Middleton	CC Town Planning	Amberville Properties	GP1	Support Council's commitment within Policy GP1 to 'work pro-actively with applicants jointly to find solutions,		Comments welcomed.
1907	Martin Herbert	Brown & Co	Edward Walpole Brown	GP1	We contend that the development strategy and allocations do not secure development that improves the economic, social and environmental conditions in the area. It is important to recognise that whilst in most Plan situations this would deal with the District only, the situation here is very different with this Plan, needing to accommodate the needs of Coventry as is identified in the MOU.	Allocate the development scheme detailed in our submission	The Local Plan has been subject to a SA thus is considered to represent sustainable development. 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

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1907	Martin Herbert	Brown & Co	Edward Walpole Brown	GP1	Para 3.1 There should be reference here to Coventry and the need to produce development on the edge of Coventry on the boundary of the land under the jurisdiction of RBC.	Add reference on the first line to “the edge of Coventry”.	proposed. The Walsgrave Hill Farm site is no longer allocated as such no change considered necessary.
1907	Martin Herbert	Brown & Co	Edward Walpole Brown	GP1	Para 3.2 - The elements of sustainable development have not been adequately taken into consideration and considered jointly	Allocate the development scheme detailed in our submission	The Local Plan has been subject to a sustainability assessment. Sustainable development has been placed at the heart of the Development Strategy. 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.
1909	Paul Hill	RPS	St Modwen	GP1	The policy is generally supported but would be more effective as follows: Policy GP1 does not accurately reproduce the wording within paragraph 14 of the Framework, from which it is taken. The policy has omitted the reference as to ‘when a development plan is silent’. Whilst making reference to absent or out-of-date the current the wording of this policy does not fully reflect the Framework. The inconsistent wording of the latter part of the policy and the duplication of national policy is not considered effective. Should the Council consider it necessary to retain this element of the policy it should reflect paragraph	New / amended is stated below: Policy GP1: Securing Sustainable Development Where there are no policies relevant to the application, or relevant policies are silent or out of date at the time of making the decision, then the Council will grant permission	Suggested changes accepted and policy altered (mods reference LP54.1).

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289	Roderick Hastie	Grandborough Parish Council	NA	GP2	<p>14 of the Framework</p> <p>Restriction on development in Rural Villages to sites within the existing boundaries has unhealthy consequences for such villages. Over time the housing mix changes as residents add extension. Number of 2-3 bed houses is reduced. At the same time, tendency for settled residents to remain for very long periods and average age of population increases. Limited scope for 'new blood' to enter village. Policy should allow limited developments of say 5-8 houses; with a majority 2 or 3 bed roomed in each period of say 5 years.</p>	<p>Has not been considered necessary to include policy restricting additions to dwellings (a similar policy was included in the 2006 Local Plan although was carried into the subsequent Core Strategy 2011). Policy H4 permits Rural Exceptions to help meet affordable housing needs for local people that cannot be met in village boundary. Possibility of new dwellings (of all sizes) to be built within boundary.</p>	<p>The development strategy seeks to direct some development to Main Rural Settlements. Smaller applications for housing for example within village boundaries are matters of Development Control. Local Plan Policy H1 informs housing mix. All villages have been subject to an assessment as to their sustainability as part of the Rural Sustainability Study.</p>
1314	Sue Green	House Builders Federation	NA	GP2	<p>Question whether or not Policy GP2 should be cross referenced to Policy DS3 with particular reference to the new proposed garden village which over the plan period will become a new Main Rural Settlement.</p>		<p>The Local Plan identifies Lodge Farm as a future Main Rural Settlement therefore no further action considered necessary.</p>
1353	Julian Woolley	NA	NA	GP2	<p>Support this policy retaining urban edge of Rugby consistent with the currently adopted Core Strategy. This retains and protects the southern edge to SE Rugby and gives protection to the Rainsbrook Valley.</p>		<p>Comments noted.</p>

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1378	Richard Allanch	NA	NA	GP2	<p>I support draft Policy GP2 and that part of the Urban Proposals Map as it runs from Ecton Leys to The Old Royal Oak in Hillmorton as this establishes a clear southern edge to South East Rugby and gives protection to the Rainsbrook Valley and the Barby Road Verge and Sow Brook Ecosite. Should any developer wish to challenge policy GP2 or that part of the Urban Proposals Map I should wish to speak at the Examination in Public. My reason for speaking would be to challenge the arguments put forward by the developers.</p>		<p>Comments noted. There are no potential development sites allocated in this location within the Local Plan.</p>

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1399	Dr Jo Reed Johnson	Pailton Parish Council	NA	GP2	<p>Policy relating to the Green Belt requires amending "New development in the Green Belt will not be allowed, only where....". Policy DS6,, Housing allocation in Brinklow is located in the Green Belt which should be protected and is too far from shops and facilities, which encourages car usage. This will also overload the Barr Lane Surgery and Revel School a Brinklow and Monks Kirby, already suffering from school run traffic. Also the need to realise the massive expansion of Magna Park which is likely to impact massively on traffic flow. 100 houses in this position won't help. Suggest that housing in Brinklow should be on split sites closer to the village centre, so that all services are within walking distance. Not taken into account changes that will occur to established community structure. Suggest much less numbers be considered and give consideration to Mast Site expansion to accommodate the 'quick fix' .</p>		<p>Main Rural Settlements have been subject to a 'rural sustainability study' . 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. 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. 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.</p>

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1437	Mark Andrews	Coventry City Council	NA	GP2	<p>Makes reference to the urban edge of Coventry but it is suggested that development in this location “would not assist in achieving sustainable development focused on Rugby Town”. Appreciates in overarching strategy, but have concerns that such a description could be construed as suggesting development on the edge of Coventry is not a sustainable option, especially in context of MoU, CCC Walsgrave Hill farm and other Warks authorities work such options have been shown to represent sustainable development opportunities.</p>		<p>Walsgrave Hill Farm is no longer proposed to be allocated due to issues in relation to deliverability and because a non- greenbelt site has come forward. RBC has been fully cooperative with the DTC and MoU in relation to meeting neighbouring authorities needs.</p>
1448	Nick Small	Stagecoach	NA	GP2	<p>Stagecoach notes that there is no additional provision made, above existing commitments, to allocate further housing land at the Main Rural Settlements, those most sustainable settlements outside Rugby, and that any further growth is proposed to be restricted to infill within defined settlement boundaries. It remains evident that many such settlements benefit from a range of facilities and services. Indeed many support half-hourly bus service. Stagecoach therefore disagrees with this strategy, especially because, given the lack of a 5-year deliverable supply of</p>		<p>The local plan does propose additional allocations of land in Policy DS3, including the release of Green Belt land, adjacent to existing Main Rural Settlements. Further detail on the development of these allocations is provided in Policy DS6. It is envisaged these allocations will play a supplementary role to the strategic growth needs of the Borough directed towards Rugby urban area.</p>

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					housing land, a small number of additional appropriate smaller allocations would be able to quickly backfill this deficit in locations where the bus service already are in place sufficient to provide a credible choice of modes.		
1455	Louise Steele	Framptons	DB Symmetry, Taylor Wimpey, Gallagher Estates, Richborough Estates and Warwickshire County Council	GP2	The Parties therefore consider that this policy is consistent with national policy as it will enable the delivery of sustainable development. It is justified in that it represents the most appropriate strategy when considered against reasonable alternatives.		Comments noted
1455	Louise Steele	Framptons	DB Symmetry, Taylor Wimpey, Gallagher Estates, Richborough Estates and Warwickshire County Council	GP2	The Parties are supportive of extensions to the urban area outside of Rugby, including the South West Rugby allocation, being the primary focus for new residential and employment development		Comments welcomed.

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1455, 1900 & 2109	Louise Steele	Framptons	SALFV	GP2	According to paragraph 3.14 the Lodge Farm development, which is located in the Countryside can therefore only be justified if it provides the exceptional delivery of housing to meet a specifically identified housing need. As set out in sections below, it is SALFVs view that the Lodge Farm development will not deliver housing to meet a specially identified need in the plan period.		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 development strategy has sought to direct development to the Rugby Urban Area however Rugby Town is unable to accommodate all of the growth identified.
1759	Yousef Dahmash	NA	NA	GP2	I wish to formally request that the Rainsbrook Valley and the countryside in the vicinity of it, in the area of Hillmorton is protected with Green Infrastructure status in the updated Local Plan. It is clear that any development in this area would already be contrary to both local, and national, policy and would not be sustainable. I believe that further scrutiny of the calculations produced by, and the methodology used by, GL Hearn in their assessment of Rugby's Objectively-Assessed Housing Need, Homes per Annum 2011-2031 (OAN) as part of their Strategic Housing Market Assessment (SHMA) should take place. I believe that elected members of Rugby Borough Council and local residents should		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.

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					<p>be able to assess this document in greater detail. Having studied the Final Report document produced I believe that there are further questions that should be asked in regards to whether the OAN used for the Local Plan – Publication Draft document is accurate. If the calculations produced by GL Hearn are inaccurate and overstate Rugby’s Housing needs then our local area may be subject to unnecessary over-development in areas local residents and elected councillors do not wish to see development take place. Essentially by overstating Rugby’s OAN the borough could be subjected to the unnecessary, and avoidable, over-provision of land for housing I also have concerns regarding the projected rate of build on the Radio Station Rugby site as outlined in the Local Plan – Publication Draft document and believe that it may have been significantly understated. I would wish to understand whether the developers of the Radio Station Rugby site agree with the projected build out on the site as outlined in the Local Plan – Publication Draft document.</p>		

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1758	John Woodcock	NA	NA	GP2	<p>The proposed development would have a significant and adverse impact on the character and appearance of the landscape in this location, the proposed dwellings would appear as an intrusive extension of the urban area into the surrounding countryside and would diminish the landscape character of this area. They would further appear visually intrusive and prominent within the landscape to the point of being harmful. The proposal would consequently not constitute sustainable development and would be contrary to policy CS16 of the Rugby Core Strategy 2011 policy GP2 of the Rugby Borough Local Plan para 17 of the national planning policy framework. Obviously any development in this area would be contrary to both the local and national policy and would not be sustainable. This area needs to be protected for future generations and classified as green infrastructure bearing in mind the extensive development that will take place in Hillmorton over the next 20 years.</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.</p>

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1871	David Green	Delta Planning	Prologis UK Ltd	GP2	Prologis Park, Ryton has an extensive planning history and now benefits from employment use planning consent with developments extending to over 2 million sqft of floor space and offers a major benefit to both Ryton and Coventry's employment markets. Local plan still shows the site as within the green belt, however given the scale of the development approved it makes no logical sense to remain in the green belt as it serves no green belt purpose. As site not considered in Green Belt Review then it appears that it was considered such low value that wasn't regarded as worthy of consideration in Green Belt terms. Removal from Green Belt would assist from operational point of view		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.
1875	Michelle Simpson-Gallego	Pegasus Planning	AC Lloyd / Persimmon	GP2	It is agreed that the proposed hierarchy represents the most sustainable locations for development, however, in order to generate volume in housing delivery – something that the previous plan failed to do, additional housing should be provided to those lower order locations in order to maximise the offer to arising households in the Borough. This will provide		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. The Council is satisfied that the development strategy and site allocations are sufficient to meet housing needs within the plan period.

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					assistance to prevent a shortfall in housing land and give the Council more control over what development happens where.		
1878	Duncan Chadwick	David Lock Associates	Tarmac Ltd	GP2	Policy GP2 should be amended to avoid unnecessary restriction on development within existing main rural settlement boundaries as this will constrain their growth, fail to support services and the local economy, and undermine their valuable contribution to meeting the Borough's housing need. Larger, more sustainable main rural settlements, such as Ryton, should be 'super' main rural settlements given its capacity for growth.		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. All Main Rural Settlements have been subject to a Rural Sustainability Study.
1898	Charles Robinson	DLP Planning Ltd	Muller Property Group	GP2	Considered that principle of GP2 is sound however housing numbers should be expressed as minimum as it is clear that areas around Coventry are experiencing difficulty in meeting housing need which may increase pressure on Rugby to deliver levels of housing required across the HMA. In general it is considered that the plan fails to provide sites which will enable housing growth to be achieved in a sustainable manner for the settlement of Stretton on Dunsmore. Considered that restriction to development 'within' these settlements is too constraining.	Further site as promoted should be allocated at Stretton on Dunsmore; sites DS3.10 and DS3.11 are not considered suitable for allocation	No change required. 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. 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, 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.

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1899	Denise Blott	DLP Planning -Muller Property Group	NA	GP2	Propose housing targets should be considered as Minima as other areas around Coventry are struggling to meet their needs putting greater pressure on Rugby. Draft local plan fails to provide sites that deliver key objectives. There should be greater flexibility in respect of the main rural settlements coming forward. The boundaries of the main rural settlements should be amended to include additional sites. Both sites DS3 suffer from environmental constraints and fail to meet any reasonable test against the principles for releasing land for the Green belt site. DS3 should be removed from the Draft Local Plan		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. 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. 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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1907	Martin Herbert	Brown & Co	Edward Walpole Brown	GP2	Does not identify a sequential approach – it identifies the locations where development is considered appropriate albeit that we contend that this Policy is unsound and does not adequately reflect the needs of the Borough and the needs of Coventry as is identified in the MOU.		The Spatial Vision seeks to direct development to the most sustainable locations; with the Rugby Urban Area being the most sustainable location within the Borough. 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.

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1907	Martin Herbert	Brown & Co	Edward Walpole Brown	GP2	Para 3.7 - Challenge RBC on this statement. We contend is not correct.		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 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.
1907	Martin Herbert	Brown & Co	Edward Walpole Brown	GP2	Para 3.11 - Not only is some of the development in the main rural settlements inappropriate but it is also incorrect, in our opinion, to say that the Main Rural Settlements will have no threshold in the size of the sites that come forward within their settlement boundaries. The settlement boundaries should be clearly defined and that in itself would impose the limit on the size of those sites which come forward.	Rework to cover reasonable constraints required.	No changes to the Main Rural Settlements are proposed save for the proposed housing allocation sites. 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. The policy is in reference to potential available sites within settlement boundaries which may come forward namely previously developed land and therefore it is not considered necessary to limit the size of sites as the key consideration would be matters of Development Control.

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1907	Martin Herbert	Brown & Co	Edward Walpole Brown	GP2	<p>Para 3.6 - Contend that the Local Plan does not guide development to sustainable locations. We consider this not only in the context of too great a focus being placed on Rugby and Strategic Urban Extensions in proximity to Rugby but also because the Plan does not reflect adequately the needs of Coventry. Also it allocates land to other rural settlements where development is either not welcomed or it is not sustainable.</p>	<p>Allocate the development scheme detailed in our submission. Review spatial vision and allocations in DS3</p>	<p>No change required. 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 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.</p>

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1907	Martin Herbert	Brown & Co	Edward Walpole Brown	GP2	Para 3.9 - This paragraph does not adequately reflect what is needed under the MOU.	Reword and make provision for MOU obligations.	No change required. 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, 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 and the commitment within the MoU. 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.
1909	Steve Harley	Oxalis Planning	Rural Development Holdings	GP2	Publication Draft document is not positively prepared because it has removed all reference to the delivery of housing near the edge of Coventry. Agree that it is sensible for Rugby town to remain the primary focus for growth with main rural settlement being on the 2nd tier. Surprising to see that, whilst Main Rural Settlements are proposed to accommodate some growth, their potential is severely limited by tightly drawn development boundaries. Binley Woods's small allocation of 'up to 62' units does not provide sufficient flexibility for housing delivery and distribution for the	Extending the settlement boundary to include an allocation at the former Oakdale Roses Garden Centre could help ensure balanced delivery.	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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					<p>medium term of the Plan period. Policy GP2 which, with regard to Main Rural Settlements, states that there will be “no threshold on the size of sites that some forward within their settlement boundary”. The tightly drawn settlement boundary is in itself a constraint on the threshold of sites, which will prevent settlements such as Binley Woods from delivering on their potential to accommodate sustainable growth.</p> <p>Council should consider the reinstatement of the ‘up to 100 dwellings’ statement previously included in consultation documents, to build flexibility into the Plan. The Council should ensure that locations outside of, but adjacent to, the settlement boundary are not dismissed out of hand, without due consideration of their context, simply because they are not within the identified boundary.</p>		

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1909	Paul Hill	RPS	St Modwen	GP2	<p>The settlement hierarchy is generally supported but would be more effective by: 1. making reference to the allocation of Lodge Farm within the Main Rural Settlement (MRS) to ensure no conflict with the principles of the hierarchy. Further the wording of DS10 states MRS therefore the change would ensure consistency throughout the Plan. 2. Para 3.11 should be expanded to include reference to Lodge Farm and its role as a MRS 3. para 3.14 refers to the countryside locations not defined by a settlement boundary. Reference should be made to the allocation of Lodge Farm to clarify that is not conflicting with this para. 4. Para 3.16 The use of the phrase “related to” is not clear as this could mean geographically related or functionally related, this should be clarified to ensure the policy is effective.</p>	<p>Justification for the proposed changes is included in section 6 (above). New / amended is stated below: Policy GP2: Settlement Hierarchy</p> <ol style="list-style-type: none"> 1. Main Rural Settlements Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, <u>Lodge Farm</u>, Ryton on Dunsmore, 2. 3.11. Main Rural Settlements (<u>including Lodge Farm</u>) play..... 3. 3.14 Countryside locations are those which are not defined by a settlement boundary <u>or allocation</u> and are.... 4. 3.16 The hierarchy in Policy GP2.....Development within the Borough that is related in close proximity to these areas or sites..... in achieving sustainable development focused on Rugby Town and any such proposal 	<p>Comments noted. Lodge Farm is identified as a future Main Rural Settlement to be planned out through this plan period. As such no specific reference is required to GP2 or para 3.11 or 3.14.</p>

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1911	Peter Wilkinson	Salisbury Investments Ltd	R Galey	GP2	<p>Overly restrictive approach to building in the countryside. The Policy is inconsistent with the NPPF and unclear in that it does not make clear the criteria for assessing development in the countryside (stating where national policy allows is not precise enough). Stating new development in the countryside will be resisted is contrary to the NPPF, which does not restrict such development. There is a clear distinction between development in isolated countryside locations and development adjacent to boundaries. Paragraph 3.9 of the Local Plan is more reflective of the NPPF but this is not included in GP2.</p>	<p>GP2 requires revision so it is more in line with the NPPF. Proposed Revision: "Countryside Development will be permitted which improves the sustainability of the countryside through the development of uses and buildings that are intrinsically appropriate to the countryside or that support the rural economy. The explanation to the policy at paragraph 3.14 should refer to examples of appropriate uses, e.g. agriculture, woodland related proposals, sport and recreation, rural economic development, tourism related development that requires a countryside location; re-use of buildings, renewable energy schemes and exceptions housing to meet local needs. It should also refer to the need to recognise the intrinsic character and beauty of the</p>	<p>The Local Plan is considered to be sound and all policies are considered to be in accordance with the NPPF. The Local Plan has been subject to an SA and an assessment of the villages in the Borough has been undertaken through the Rural Sustainability Study.</p>

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						countryside whilst balancing against this the development needs of the Borough.	
1912	Chontell Buchanan	First City Limited	Archdiocese of Birmingham	GP2	Rural exception affordable housing or community led development schemes should not be the only type of development allowed on sites adjacent to the settlement boundary. Sustainable developments outside the settlement boundary should be considered.	Paragraph 3.13 should read as follows: Some schemes, including but not exclusive to rural exception affordable housing policies or as community led development schemes, may come forward on sites outside the defined settlement boundaries of Main Rural Settlements and Rural Villages. Such schemes may be acceptable if they meet the social or economic needs of the Borough. Parish Councils may wish to bring forward Neighbourhood Development Plans which include proposals for additional development. The choice of sites needs to take into account the principles of sustainable development, the relevant policies in this Plan and the content of	The sustainability of rural settlements has been assessed as part of the 'Rural Sustainability Study' and the Local Plan has been subject to a sustainability assessment. The development strategy seeks to direct development to the most sustainable location- the Rugby Urban Area- alongside limited development in Main Rural Settlements.

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1932	Nick Carr	Rosconn Group	Peter Frampton (Framptons)	GP2	Settlement hierarchy identifies Rugby Town, then Main Rural Settlements. Countryside and green belt are not settlements for the purpose of a settlement hierarchy so should be redefined. The spatial strategy focuses too heavily on large housing settlements. There is a shortfall in the number of dwellings that could be provided by DS3.10 and Ds3.11- compared to the 100 identified for MRS- which this site could help fill.	national planning policy. The omission of Lodge Farm and greater housing provision allocated to MRS's as this will improve delivery so sites aren't burdened by large infrastructure delivery.	Lodge Farm has been subject to an SA and represents a development site outside of the green belt without any identified highways delivery constraints. The development strategy identified is considered the most suitable for offering a variety of sites by size and location in order to increase housing delivery.
1940	Michael Burrows	Savills	Legal and General	GP2	Proposed distribution strategy is sound; NPPF recognises the role of development in supporting rural areas. Wording of settlement hierarchy assumes that all development within main rural settlements will be included within a revised settlement boundary, which is currently not the case.	Amendment to GP2: Development will be permitted within the existing boundaries of all Main Rural Settlements and on allocated residential sites.	Comments noted. Once allocated sites to form part of new settlement boundaries.
1940	Michael Burrows	Savills	Legal and General	GP2	Proposed distribution strategy is sound; NPPF recognises the role of development in supporting rural areas. Wording of settlement hierarchy assumes that all development within main rural settlements will be included within a revised settlement boundary, which is currently not the case.	Amendment to GP2: Development will be permitted within the existing boundaries of all Main Rural Settlements and on allocated residential sites.	Upon adoption, the boundaries of the Main Rural Settlements will be amended to match site allocations.

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2117	Isla Longmuir	How Planning LLP (On behalf of Taylor Wimpey)	Andrew Thorley	GP2	Supporting document submitted promoting land to the East of Barby Lane (which is currently subject to a planning application for unto 113 dwellings). Document outlines the sites suitability and the need to develop sites along the Rugby urban edge. The site would contribute to the Councils 5 year land supply. Delivery of sites along the urban edge will contribute to meeting the annual targets for the plan period 2017-2022, which have been above historical delivery rates. The site is suitable, deliverable and sustainable.	The site should be allocated as part of the residential proposals map	Site currently going through the Planning Application process. 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.
2120	Michelle Simpson-Gallego	Pegasus Group	Peter Drakesford	GP2	Additional residential allocations should be made to 'lower order' settlements to ensure delivery.		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. The Council is satisfied that the development strategy and site allocations are sufficient to meet housing needs within the plan period.
2121	Michelle Simpson	Pegasus Group	NA	GP2	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		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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					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.		
1455, 1900 & 2109	Louise Steele	Framptons	SALFV	GP2	SALFV note that paragraph 3.9 is the first attempt by the Council in the Local Plan Publication Draft to justify the Lodge Farm development. SALFV consider that the remainder of the paragraph then attempts to justify development in a remote location such as Lodge Farm. For the reasons set out below, there are no overall social and economic benefits from the proposals at Lodge Farm which outweigh the disadvantages of a location which is remote (over five miles away) from any facilities. SALFV agree that development should be directed to Rugby town and in the urban area outside of Rugby. SALFV however consider that this hierarchy, as set out in the Local Plan Publication Draft does not support the Lodge Farm allocation which is in as isolated, unsustainable location and it is considered that there is no national policy which justifies this allocation in a countryside location.		Rugby Town is incapable of accommodating the housing need identified in the SHMA and a large proportion of the Borough is within the green belt so RBC has to consider countryside locations within the Borough in order to meet projected demand. Lodge Farm has been subject to a Sustainability Assessment and it is considered that as the largest Main Rural Settlement in the Borough, the proposed development would become sustainable. DS10 and the IDP outline the infrastructure to be provided.

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1875 & 2119	Michelle Simpson-Gallego	Pegasus Planning	AC Lloyd / Persimmon	GP2	It is agreed that the proposed hierarchy represents the most sustainable locations for development, however, in order to generate volume in housing delivery – something that the previous plan failed to do, additional housing should be provided to those lower order locations in order to maximise the offer to arising households in the Borough. This will provide assistance to prevent a shortfall in housing land and give the Council more control over what development happens where.	Whilst the hierarchy proposes the majority of RBC's housing target to be provided within or on the edge of the Rugby urban area as the most sustainable location within the Borough, allocations are proposed at other levels of the hierarchy, including extensions to Main Rural Settlements and a new settlement / garden village, in order to provide some diversity in housing supply locations as a means of maximising delivery from allocated sites.	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. The Council is satisfied that the development strategy and site allocations are sufficient to meet housing needs within the plan period.

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1442	Rohan Torkilsden	Historic England	NA	GP3	<p>Seek that non designated assets are conserved as many will be of architectural and historic interest and of communal, aesthetic and evidential value. Whilst adaptation and re use can help secure their future it is vital related works are appropriate to ensure the aforementioned values are recognised and the integrity and significance of the buildings and farmsteads are safeguarded.</p>	<p>Suggest the following text: To help conserve the architectural and historic significance of Rugby's traditional agricultural buildings, an understanding of the essential features of the building, its relationship to the wider landscape setting and its sensitivity to change should inform the alterations that might be made. Appropriate materials should be used and also methods of repair that respect the buildings significance. As the fabric of the building will embody its character and interest, as much as possible should be retained. Good practice advice prepared by Historic England is available to help inform a sensitive approach to any conversion.</p>	<p>The Local Plan is considered to offer strong support to heritage assets. Non-designated assets are matters of Development Control.</p>

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1909	Steve Harley	Oxalis Planning	Rural Development Holdings	GP3	Emerging Policy GP3 of the Publication consultation document supports the development of previously developed land. The former garden centre site at Binley Woods would thus satisfy this emerging policy, whilst bringing back into use an unattractive and vacant site. A number of potential options for the site are currently being considered, including residential development; accommodation for older people; a new Garden Centre; or a mixed use proposal incorporating a combination of the above uses. A mixed use proposal could help make the Garden Centre use a more viable option in this location. A strong and generous landscape buffer would maintain separation between Binley Woods and Brandon.		A site has already been allocated in Binley Woods itself and sufficient supply of housing sites have been identified throughout the Borough. The former garden centre has already been subject to an assessment, with all information available online.
1911	Peter Wilkinson	Salisbury Investments Ltd	R Galey	GP3	Previously developed sites can make an important contribution to meeting development needs and delivering sustainable development.		The redevelopment of previously developed sites is broadly supported and is largely a matter of Development Control.

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1935	Mrs Sophie Horsley	Strutt & Parker	John Tarrant	GP3	Rugby is the most sustainable settlement within the Borough. It has excellent road and rail connections, which has made it an attractive location for employment and its growth potential is relatively unconstrained. It is therefore appropriate that the draft Local Plan allocates almost 80% of housing to Rugby within the Plan period. Consider that this emphasis on the most sustainable settlement in the Borough is justified and that the Council has taken a pragmatic approach to the delivery of large urban extensions by extending the delivery beyond the plan period. However, there is a risk that the emphasis on large allocations will make it difficult for the Council to maintain a five year supply of housing land in the early plan period as evidenced by the Rugby Housing Delivery Study prepared by GL Hearn on behalf of RBC.		Comments welcomed. The Development Strategy seeks to allocate a variety of sites both in terms of size and location with enough sites capable of coming forward early on in the plan period in order to maintain a 5 year housing land supply.
1442	Rohan Torkilsden	Historic England	NA	GP3	It would be helpful if the Borough Council could clarify their expectations of Historic England in this respect.		Comment noted . HE are consulted on all planning applications for proposed development on heritage assets, so it is this instance where the advice will be sought from HE for view on the impact the proposed development may have
1448	Nick Small	Stagecoach	NA	GP4	Stagecoach strongly supports this draft Policy.		Comments noted
1448	Nick Small	Stagecoach	NA	GP4	Stagecoach strongly supports this		Comments noted

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1866	Gary Stephens	Marrons Planning	Gallagher Estates Limited and David Wilson Homes (East Midlands) (GE/DWH)	GP4	<p>draft Policy.</p> <p>There is no policy basis within the Framework or evidence to justify preventing development on the grounds that it might prejudice the development potential of other land. 'Other land' is not defined within the draft Plan or its glossary, and accordingly is a meaningless phrase as the plan is presently drafted.</p> <p>If 'other land' is intended to be land which is allocated for a specific use (including infrastructure or flood risk management), and development would prejudice its delivery and thereby the achievement of the Plan, then there might be some basis for preventing development. However, the policy as worded appears to apply this principle to all land (allocated or otherwise) and all land uses (necessary or otherwise). Paragraph 154 of the Framework requires clear policies on what will or will not be permitted and where, and only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.</p>	<p>GE/DWH would recommend the policy is amended to make it clear that it only relates to land specifically identified within the Development Plan for a specific use such as infrastructure or flood risk management.</p>	<p>Development may prevent the potential of other land being realised. Such land may or may not be contiguous and any potential it might have could be within the period of this Local Plan, or beyond. Similarly, it may prevent the provision of important infrastructure, e.g. extensions to the drainage system and the highway network, or the implementation of other transport schemes, including pedestrian and cycle links. It may in particular hinder the achievement of appropriate mixed use developments. Such development could therefore frustrate the proper planning of the larger area and a comprehensive approach to its development, which would not be consistent with the efficient use of resources. The sterilisation of areas of land can often occur with the development of 'back land' and areas of vacant or underused land. Where appropriate the Council will prepare briefs to assist the comprehensive development of an area, including land allocated for development in this Local Plan.</p>

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1901	Mathieu Evans	Gladman Developments Ltd	NA	GP4	Policy is unclear as to what it is trying to achieve in context of planned delivery of development set out in the plan. Whilst it is prudent for Council to consider land needed for infrastructure, the policy as worded goes significantly further and could be used to bar sustainable development. No criteria presented in the policy and seem to be related to part of PPG that considers arguments concerning prematurity in the granting of planning consents in relation to emerging development plans. Such a policy reduces the ability of the local plan to respond flexibly to the need to identify further development sites.	The first bullet point of policy should be deleted, or the policy deleted in its entirety.	The IDP has identified the key infrastructure needed to deliver the plans housing allocations and as such the Policy is considered critical and its wording is considered proportionate.
1119	Ross Middleton	CC Town Planning	Amberville Properties	GP5	Which means that proposals can be approved wherever possible...?' Policy GP5, should contain additional wording which makes it clear that such parish/neighbourhood level documents should be positively prepared and in broad compliance with those strategic development plan. Policies for Rugby Borough.		RBC works with Parish Councils to ensure that Neighbourhood Plans are in conformity with the Local Plan. No change considered necessary.
1314	Sue Green	House Builders Federation	NA	GP5	There should be a clearer distinction between statutory Neighbourhood Plans and non-statutory Parish Plans. Any such Plans should be in general	Alteration to text to provide clarity as suggested	Policy GP5 seeks to define the status of the neighbourhood plan.

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					conformity with the strategic policies of the Local Plan as set out in national policy.		
1398	Ian Bentlett	Yarborough PC and Hill Street Youth Center	NA	GP5	GP5 makes reference to Parish Plans, however have been told they (and VDS) are no longer considered to be very relevant due to Neighbourhood Development Plans now in existence.. Section 3.26 confuses the matter further by saying Neighbourhood Plans may not be relevant and Parish Plans may be more appropriate.	Parish Plans and VDS still relevant and material considerations, as per GP5. Neighbourhood Plans may be more suitable for some settlements to form planning policies to help assess development and use of land in a neighbourhood, such as where new homes or shops should be built.	Comments noted however no further action required. Parish Council welcome to discuss with RBC to consider options further.
1399	Dr Jo Reed Johnson	Pailton Parish Council	NA	GP5	GP5- Also believe a strong policy should exist for rural villages to reflect Housing Need, which is informed through an up to date Community led and neighbourhood Parish Plan, endorsed through their parish council and a divisive, independent or RBC led, housing allocation.	Subject to policy, identified local needs can be identified and development schemes considered in line with policy. Identified local need for affordable housing may facilitate Rural Exception site.	Parish Councils have the opportunity to develop a Neighbourhood Plan, with several villages having taken up the opportunity to do so or are in the process of developing a Neighbourhood Plan.
1406	Julie Warwick	Wolvey Parish Council	NA	GP5	The Parish Council therefore supports Policy GP5 and paragraphs 3.24 and 3.25 of the Local Plan. Parish Council welcomes the inclusion of this policy, particularly as its currently preparing its own Neighbourhood Plan. Policy confirms such plans will be taken into account.		Comments noted.

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					Supports Policy GP5 and paragraphs 32.24 and 3.25 of the local plan.		
1909	Paul Hill	RPS	St Modwen	GP5	<p>Clarity needed for the term endorsement for Parish Plan, is it related to process or general conformity with the Local Plan? Policy does not make clear that parish or neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. 3.The policy fails to recognise the varying weight to be placed on emerging neighbourhood plans when making decisions on the matters outlined, this is not consistent with paragraph 216 of the Framework. 4. The policy as a whole uses Parish and Neighbourhood Plans interchangeably, and makes reference to “equivalent” plans. This is not consistent with the Framework which, in paragraphs 183 and the glossary only references Neighbourhood Plans.</p>	<p>Justification for the proposed changes is included in section 6 (above). New / amended is stated below: Policy GP5: Parish or neighbourhood level documents</p> <ol style="list-style-type: none"> Where the views of a community are expressed in a Parish or Neighbourhood Plan (or equivalent), they will be taken into account in the planning system. For the views of a community to be considered, the Parish or Neighbourhood Plan will need to: <ul style="list-style-type: none"> · have been endorsed by Rugby Borough Council; 2. <ul style="list-style-type: none"> · <u>be in general conformity with the strategic policies of this Plan;</u> · be in conformity with national policy; and · be regularly reviewed and updated if necessary. 	<p>Comment noted. LP54.3 shows the revisions to GP5 as a consequence of representations made to the Publication stage consultation. This clarifies the status of the relevant parish or neighbourhood level documents.</p>

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						<p>The use of Parish or Neighbourhood Plans will principally inform:</p> <ul style="list-style-type: none"> · the assessment of schemes in the context of a need identified through the Parish or Neighbourhood Plan. <p><u>3. Emerging Parish or Neighbourhood Plans will be given appropriate weight in accordance with paragraph 216 of the Framework.</u></p>	
1935	Sophie Horsley	Strutt and Parker	Will Main (Manor Oak Homes)	GP5	<p>GP5 should be removed as it contravenes national policy because Parish Plans shouldn't be used for development management purposes as this gives undue weight to non-statutory plans which lack an evidence base and haven't been through an examination process. Removing GP5 would not undermine the consideration of local plans as a material consideration in decision making.</p>		<p>Neighbourhood Plans are given the same weight as a Local Plan in national Planning legislation. It is not considered proportionate to remove GP5 as the Local Plan has to address neighbourhood planning.</p>
1106 & 1913	David Joseph	Bloor Homes	NA	GP2 & GP5	<p>DS 3.8 land North of Coventry Road, Long Lawford could be capable of accommodating more than 100 dwellings, so greater flexibility on capacity assumptions required</p>	<p>Amend residential allocation DS3.8 to a minimum of 100 dwellings</p>	<p>The Main Rural Settlement Pack details the allocation of DS3.10 including reference to the heritage asset review and the archaeological constraints which are considered at the local plan stage to limit the capacity of the site to 100. No change recommended.</p>

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1452	Public Health Warwickshire	Public Health Warwickshire	NA	GP1, GP2, GP3, GP4 & GP5	Businesses offering unhealthy food choices such as hot food takeaways or bars should be restricted, shops selling cheap sweets and fizzy drinks. Planning decisions should be cognisant of this and strive to limit the number of such shops in close proximity to schools. Road design should improve safety with traffic calming infrastructure including road humps and road narrowing. Speed limit in residential areas should be 20mph and Play Street which as streets that are temporary street closures a that children can play safe on roads.		There is currently no applicable policy regarding this comment. 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. No change to Policies