

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

1314	Sue Green	House Builders Federation	NA	Context, Vision and Objectives	Basis for CW MoU housing redistribution is reasonable but this should have been subject to a sustainability appraisal as plans may have unsustainable sites that might risk the delivery of the HMA need. Issue of Nuneaton BC not signing the MoU which could mean the HMA need is not met in full and there is also the potential ripple effect of Birmingham CC unmet needs being met in part by North Warks BC and Stratford DC, which could impact on Rugby BC.		Comments noted however no further action considered necessary
1398	Ian Bentlett	Harborough PC and Hill Street Youth Centre	NA	Context, Vision and Objectives	In 2.12 states that two Borough areas are amongst the most socially deprived in the UK, yet nowhere in the Spatial Vision and Objectives (2.22 and 2.23) does it mention how this is going to be addressed.. Why has it been ignored and how are the Council intending to address it.		Comments noted however no further action considered necessary

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1403	Sylvia Jacques	Thurlaston PC		Context, Vision and Objectives	Major disappointment of this Local Plan is the total lack of vision for our community. Document paints a portrait but is lacking in a positive ambition for the town. Proposal is turning Rugby into a warehousing centre with no efforts being made to attract manufacturing or technical development institutions. Warehouses in the future will be driven by robots, not humans. Will not create the long term employment that we need. TPC believes that the warehouse requirement has been totally overestimated.		The spatial vision sets out RBCS vision for the town. 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.
1403	Sylvia Jacques	Thurlaston PC		Context, Vision and Objectives	Town centre needs to be a blend for culture, entertainment and a pleasant retail experience. The plan gives no clue as to how the Town Centre will be invigorated. Already 5 years in to the plan (2011-2031 and the Town Centre is deteriorating)		There is a Town Centre Action Plan separate from the Local Plan process. The Local Plan seeks to direct town centre uses to the town centre before other locations within the Borough, seeks to protect the retail function of the town centre and seeks to contract the town centre boundary in order to focus commercial uses in closer proximity.
1403	Sylvia Jacques	Thurlaston PC		Context, Vision and Objectives	The nine spatial objectives in para 2.23 pay lip service to the objectives reality. They are sound objectives, but implementation plans to achieve them will not be found in the document. RBC needs to take heed of residents.		The objectives define the vision for Rugby with each Policy in the plan working towards achieving each objective.

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1430	Andrew Morgan	Place Partnership	Warwicks hire Police and West Mercia Police	Context, Vision and Objectives	Spatial Objectives should reference the need to ensure that places and communities are safe, secure and enjoy low crime rates. This would their consistency with paragraphs 58 and 69 of the National Planning Policy Framework (NPPF), which state that planning policies and decisions should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Also provides consistency with draft local plan policies, Council strategy's and the PPG	Spatial Objective 1 are made, as highlighted in bold: 'To protect and enhance existing local services and create new neighbourhoods that <b>are safe, secure, enjoy low crime levels and</b> contain services that meet the day to day needs of the new communities. Enable appropriate amounts of development in Main Rural Settlements to bolster their role as local service centres.'	Policy has been formulated in relation to evidence base and is considered to be sound.
1430	Andrew Morgan	Place Partnership	Warwicks hire Police (WP) and West Mercia Police (WMP)	Context, Vision and Objectives	The Spatial Vision should expressly confirm that the aspiration is to create safe and secure communities that are enjoy low crime levels, it is inconsistent with the policies of the Local Plan, the NPPF, NPPG and other existing strategies of the Council. This in turn jeopardises support and in turn delivery of those design measures and infrastructure that are necessary to achieve this aspiration.	Spatial Vision should incorporate the following amendments as shown in bold: - 'The Borough's local neighbourhoods will each have local services, community facilities and usable public spaces <b>that are safe, secure and enjoy low crime levels. Residents will benefit from being</b> well connected by a sustainable public transport system, incorporating excellent rail and bus links to	Policy has been formulated in relation to evidence base and is considered to be sound.

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						ensure access to employment, health and local services.'	
1430	Andrew Morgan	Warwickshire Police and West Mercia Police	Andrew Morgan	Context, Vision and Objectives	Generally supportive of Spatial Vision it should directly reference the need to ensure that the Borough's communities are safe, secure and enjoy low crime rates. This would enable consistency with paras 58 and 59 of the NPPF which states plans and decisions should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Furthermore paragraph 156 NPPF states that Local Plans should include strategic policies to deliver the security infrastructure needed for their areas. Absence of any reference in the spatial vision to ensuring the Borough is safe and secure is also contrary to National Planning Practice Guidance. Absence of linkage with other documents and Council objectives which include priorities and actions for safer Borough.	Incorporate 'The Borough's local neighbourhoods will each have local services, community facilities and usable public spaces that are safe, secure and enjoy low crime levels. Residents will benefit from being well connected by a sustainable public transport system, incorporating excellent rail and bus links to ensure access to employment, health and local services.'	Policy has been formulated in relation to evidence base and is considered to be sound. (Therefore amendments not considered necessary or suitable).
1430	Andrew Morgan	Warwickshire Police and West Mercia Police	Andrew Morgan	Context, Vision and Objectives	Absence of reference in Spatial Vision to ensuring safe, secure and low crime communities also inconsistent with existing parts of plan: HS1, HS4 and DS8.	Public spaces that are safe secure and enjoy low crime levels. Residents will benefit from being	Policy has been formulated in relation to evidence base and is considered to be sound. (Therefore amendments not considered necessary or suitable).

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1430	Andrew Morgan	Warwickshire Police and West Mercia Police	Andrew Morgan	Context, Vision and Objectives	<p>Unless the Spatial Vision expressly confirms that the aspiration is to create safe and secure communities that are enjoy low crime levels, it is inconsistent with the aforementioned policies of the Local Plan, the NPPF, NPPG and other existing strategies of the Council. This in turn jeopardises support and in turn delivery of those design measures and infrastructure that are necessary to achieve this aspiration. Overall, the support elsewhere in the Local Plan for design measures and infrastructure to ensure safety, security and low crime levels is welcome, but without a clear Spatial Vision on this issue the Local Plan does not present an effective and sound message. This in turn undermines the promotion of safety, crime prevention and the provision of appropriate infrastructure for the emergency services. We therefore contend that the inclusion of the proposed amendment is essential to make the Local Plan sound.</p>	Well connected by a sustainable public transport system, incorporating excellent rail and bus links to	Policy has been formulated in relation to evidence base and is considered to be sound. (Therefore amendments not considered necessary or suitable).

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1430	Andrew Morgan	Warwickshire Police and West Mercia Police	Andrew Morgan	Context, Vision and Objectives	<p>3rd bullet point is welcome however ineffective for two reasons: 1) Extremely brief for what is a complex subject area and does not identify detailed guidance applicants expected to follow. 2) No information as to what is precisely meant or intended - how would a DC officer make a decision and how would an applicant be able to tell what the Council and Police are looking for? Very different interpretations as a result. Risks safety and security and not effective. These issues were raised at the Preferred Option stage. Security in design not covered instead by Part Q Building Regulations for several reasons. If covered by an SPD instead this would be an unsound approach as would duplicate other guidance and also become dated. No reason to not directly require developments to comply Secured by Design document. National Planning Practice Guidance has not been complied with. Alterations made to other local plans and development documents to include this and these have been accepted and commented on by the Planning Inspectorate. Requiring developments to comply with</p>	<p>3rd bullet point should be amended as follows:          · Incorporate Secured by Design principles and standards, thereby ensuring that the potential for crime and anti-social behaviour is minimised and community safety is improved.</p>	<p>Policy has been formulated in relation to evidence base and is considered to be sound. (Therefore amendments not considered necessary or suitable).</p>

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					Secured by Design through HS1 is wholly acceptable, reasonable and necessary to ensure soundness. By contrast, if the current wording remains it will be ineffective and contrary to NPPF and NPPG.		
1430	Andrew Morgan	Warwickshire Police and West Mercia Police	Andrew Morgan	Context, Vision and Objectives	Generally supportive although object to current drafting. Should reference need to ensure places and communities are safe, secure and enjoy low crime rates. This would be consistent with paras 58 and 69 of the NPPF. Inconsistent with para 156 regarding provision of security and other local facilities. Policies and decision making should be seamless according to para 186. Infrastructure planning should accompany development planning as required by para 177, who should in turn work with infrastructure providers (para 162).Amending the Spatial Objectives to address this would assist the Local Plan's effectiveness in helping to enable the achievement of the objectives of the Rugby Regeneration Strategy for Rugby 2015-2019 and the Together for a Safer Rugby - Partnership Plan 2014-2017. Not doing so would undermine effectiveness of HS1, HS4 and DS8.	Suggest following amendment 'To protect and enhance existing local services and create new neighbourhoods that are safe, secure, enjoy low crime levels and contain services that meet the day to day needs of the new communities. Enable appropriate amounts of development in Main Rural Settlements to bolster their role as local service centres.'	Policy has been formulated in relation to evidence base and is considered to be sound. (Therefore amendments not considered necessary or suitable).

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1430	Andrew Morgan	Place Partnership	Warwicks hire Police (WP) and West Mercia Police (WMP)	Context, Vision and Objectives	<p>The Spatial Vision should expressly confirm that the aspiration is to create safe and secure communities that are enjoy low crime levels, it is inconsistent with the policies of the Local Plan, the NPPF, NPPG and other existing strategies of the Council. This in turn jeopardises support and in turn delivery of those design measures and infrastructure that are necessary to achieve this aspiration.</p>	<p>Spatial Vision should incorporate the following amendments as shown in bold: - ‘The Borough’s local neighbourhoods will each have local services, community facilities and usable public spaces <b>that are safe, secure and enjoy low crime levels. Residents will benefit from being</b> well connected by a sustainable public transport system, incorporating excellent rail and bus links to ensure access to employment, health and local services.’</p>	<p>Amend vision as described to provide consistency throughout the document</p>
1430	Andrew Morgan	Warwickshire Police and West Mercia Police		Context, Vision and Objectives	<p>Generally supportive of Spatial Vision it should directly reference the need to ensure that the Borough's communities are safe, secure and enjoy low crime rates. This would enable consistency with paras 58 and 59 of the NPPF which states plans and decisions should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Furthermore paragraph 156 NPPF states that Local Plans should</p>	<p>Incorporate ‘The Borough’s local neighbourhoods will each have local services, community facilities and usable public spaces that are safe, secure and enjoy low crime levels. Residents will benefit from being well connected by a sustainable public transport system, incorporating excellent rail and bus links to</p>	<p>Comments noted however no further action considered necessary. Policy has been formulated in relation to evidence base and is considered to be sound.</p>

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					<p>include strategic policies to deliver the security infrastructure needed for their areas. Absence of any reference in the spatial vision to ensuring the Borough is safe and secure is also contrary to National Planning Practice Guidance. Absence of linkage with other documents and Council objectives which include priorities and actions for safer Borough. Absence of reference in Spatial Vision to ensuring safe, secure and low crime communities also inconsistent with existing parts of plan: HS1, HS4 and DS8. Unless the Spatial Vision expressly confirms that the aspiration is to create safe and secure communities that are enjoy low crime levels, it is inconsistent with the aforementioned policies of the Local Plan, the NPPF, NPPG and other existing strategies of the Council. This in turn jeopardises support and in turn delivery of those design measures and infrastructure that are necessary to achieve this aspiration.</p>	<p>ensure access to employment, health and local services. 'Overall, the support elsewhere in the Local Plan for design measures and infrastructure to ensure safety, security and low crime levels is welcome, but without a clear Spatial Vision on this issue the Local Plan does not present an effective and sound message. This in turn undermines the promotion of safety, crime prevention and the provision of appropriate infrastructure for the emergency services. We therefore contend that the inclusion of the proposed amendment is essential to make the Local Plan sound.</p>	

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1430	Andrew Morgan	Warwickshire Police and West Mercia Police	Andrew Morgan	Context, Vision and Objectives	<p>3rd bullet point is welcome however ineffective for two reasons: 1) Extremely brief for what is a complex subject area and does not identify detailed guidance applicant's expected to follow.2) No information as to what is precisely meant or intended - how would a DC officer make a decision and how would an applicant be able to tell what the Council and Police are looking for? Very different interpretations as a result. Risks safety and security and not effective. These issues were raised at the Preferred Option stage. Security in design not covered instead by Part Q Building Regulations for several reasons. If covered by an SPD instead this would be an unsound approach as would duplicate other guidance and also become dated. No reason to not directly require developments to comply Secured by Design document. National Planning Practice Guidance has not been complied with. Alterations made to other local plans and development documents to include this and these have been accepted and commented on by the Planning Inspectorate. Alterations made to other local plans and</p>	<p>3rd bullet point should be amended as follows:</p> <ul style="list-style-type: none"> <li>· Incorporate Secured by Design principles and standards, thereby ensuring that the potential for crime and anti-social behaviour is minimised and community safety is improved.</li> </ul>	<p>To include suggested amendment would go beyond what is required within the NPPF. Policy has been formulated in relation to evidence base and is considered to be sound.</p>

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					<p>development documents to include this and these have been accepted and commented on by the Planning Inspectorate. Requiring developments to comply with Secured by Design through HS1 is wholly acceptable, reasonable and necessary to ensure soundness. By contrast, if the current wording remains it will be ineffective and contrary to NPPF and NPPG.</p>		
1430	Andrew Morgan	Warwickshire Police and West Mercia Police	Andrew Morgan	Context, Vision and Objectives	<p>Generally supportive although object to current drafting. Should reference need to ensure places and communities are safe, secure and enjoy low crime rates. This would be consistent with paras 58 and 69 of the NPPF. Inconsistent with para 156 regarding provision of security and other local facilities. Policies and decision making should be seamless according to para 186. Infrastructure planning should accompany development planning as required by para 177, who should in turn work with infrastructure providers (para 162). Amending the Spatial Objectives to address this would assist the Local Plan's effectiveness in helping to enable the achievement of the objectives of the Rugby Regeneration Strategy for Rugby 2015-2019</p>	<p>Suggest following amendment 'To protect and enhance existing local services and create new neighbourhoods that are safe, secure, enjoy low crime levels and contain services that meet the day to day needs of the new communities. Enable appropriate amounts of development in Main Rural Settlements to bolster their role as local service centres.'</p>	<p>To include suggested amendment would go beyond what is required within the NPPF.</p>

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					and the Together for a Safer Rugby - Partnership Plan 2014-2017. Not doing so would undermine effectiveness of HS1, HS4 and DS8. Absence of reference is also contrary to NPPG.		
1436	Mark Harrison	The Coal Authority	NA	Context, Vision and Objectives	Rugby has limited coal mining legacy in West of the Borough. Having reviewed the document can confirm that no specific comments to make on the Publication Draft.		Comments noted however no further action considered necessary
1442	Rohan Torkilsden	Historic England	NA	Context, Vision and Objectives	Historic England welcome the commitment to protect and enhance the Borough's historic environment, and to build on Rugby's rural market town character by protecting, utilising and enhancing historic assets and ensuring all new development demonstrates high quality design, maintaining an attractive built environment throughout the Borough.		Comments welcomed.

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1448	Nick Small	Stagecoach	NA	Context, Vision and Objectives	<p>Paragraph 2.22 states at the outset that Rugby Borough Council intends that the town centre will be a "prosperous and attractive town entre...supporting a wide range of shops, leisure and entertainment opportunities". While this sentiment is laudable, recent decisions and interpretation of national and current policy by RBC have seen a marked concentration of all such uses out-of-town off Leicester Road. Stagecoach notes and welcomes the statement in the "Vision" that "Residents within the Borough will be well connected by a sustainable public transport system. However the spatial strategy, and the range of policies that are proposed to deliver the Vision, are fundamentally at odds with this aspiration, as currently drafted.</p>		<p>Comment noted. However, whilst acknowledging the challenges the town centre has faced in recent years the retail and town centre chapter contains policies which seek to build on the offer that the town centre already has, within the context of the NPPF. This is considered to be consistent with the vision and objectives. No change recommended.</p>
1637	Ian Bates	NA	NA	Context, Vision and Objectives	<p>Spatial vision and objectives are missing any commitment relating to suitable infrastructure being provided in terms of education, transport mitigation, water supply and health. Objectives should be SMART rather than just waffle.</p>		<p>Policy has been formulated in relation to evidence base and is considered to be sound.</p>

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1866	Gary Stephens	Marrons Planning	Gallagher Estates Limited and David Wilson Homes (East Midlands) (GE/DWH )	Context, Vision and Objectives	Given the significance of housing delivery to achieving the economic, social and environmental goals of the Council, it is important this is expressly recognised as a spatial objective of its Plan.	New Spatial objective "to significantly boost housing supply within the Borough to meet future housing need and address the backlog of unmet housing need that has arisen during the early part of the Plan period as soon as possible'."	Policy has been formulated in relation to evidence base and is considered to be sound. (Therefore amendments not considered necessary or suitable).
1872	Rob Wells	Savills	Neyland Properties Ltd	Context, Vision and Objectives	Support the Spatial Vision's aim to provide a strong economy and a range of high quality employment opportunities and with Rugby's principal urban area to be the focus of sustainable growth.		Comment noted
1872	Rob Wells	Savills	Neyland Properties	Context, Vision and Objectives	Disagreement that there is an over-reliance on transport, logistics and distribution. The Council's own evidence base identifies that of the 6,729 jobs required over the plan period, 4,290 (74%) will be in logistics. Therefore spatial objective 4 is inconsistent with the evidence of the ELR and background paper. 74% is evidence of over-reliance and suggests the development of an unbalanced local economy.	Objective 4 be amended to reflect the economic importance of logistics	Comment noted. Although the ELS acknowledges that logistics is the largest growth in economic development, the evidence also identifies a demand for small scale and other B uses by providing a breakdown of demand by B use classes. As such it is important to make specific reference to this to ensure it is not overlooked.

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1872	Rob Wells	Savills	Neyland Properties Ltd	Context, Vision and Objectives	Support the Spatial Vision's aim to provide a strong economy and a range of high quality employment opportunities and with Rugby's principal urban area to be the focus of sustainable growth.		Comments noted
1872	Rob Wells	Savills	Neyland Properties Ltd	Context, Vision and Objectives	Support the objective of ensuring an expanding and diverse economy but disagree that there is an over reliance on logistics, transport and distribution (Objective 4). The Council's own supporting evidence in the ELR and Employment Land Background Papers supports the logistics/distribution industry and, indeed, recognises that of the 6,729 jobs required over the plan period, some 4,290 (74%) will be generated within the B8 sector. Objective 4 as worded by inferring that there is a current over reliance upon logistics within local economy is therefore inconsistent with evidence of the ELR and background papers albeit that no prediction is made to how the contribution made by the logistics sector will increase as a percentage of overall economic performance.	It is suggested that objective 4 is amended to reflect the importance of the logistics sector to the economic success of the borough and that it remains an important and vital component to the economic wellbeing of the borough within a mixed-use economy.	To include suggested amendment is not considered to be reasonable and would go beyond what is required within the NPPF. This response is relevant for all suggested amendments which we have not actioned in the minor changes table.
1872	Rob Wells	Savills	Neyland Properties	Context, vision, objectives	Supports economic objectives and focusing growth around Rugby town.		Comment noted.



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1876	David Keene	David Lock Associates	Manse Opus LLP and Rolls Royce	Context, Vision and Objectives	Support the spatial vision for the Borough, in particular the objective to strengthen the links and relationships within the Coventry and Warwickshire sub-region. There is a well-documented lack of high quality strategic employment sites, both in Rugby and the West Midlands generally. Joint venture of Manse Opus LLP and Rolls Royce to redevelop existing site and promote additional land north of Ansty Park to regenerate the surplus area of the Rolls Royce Ansty site.		Comments noted. Promotion of employment site redevelopment addressed in further Manse Opus LLP and Rolls Royce reps/Council responses - see Chapters 4 and 6.

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1907	Martin Herbert	Brown & Co	Edward Walpole Brown	Context, Vision and Objectives	<p>Contend that the links and relationship with Coventry and the needs of Coventry need to be improved and indeed accommodated through the Plan process. Also in the fifth paragraph, in view of the spatial distribution and the needs as identified under the MOU it is inappropriate to state that the majority of the development will be focused on a Rugby urban area. Significant development is needed on the edge of Coventry to accommodate the needs of Coventry City as is provided for in the MOU.</p>	<p>Allocate the development scheme detailed in our submission</p>	<p>Comment not considered relevant for vision or consistent with the distribution strategy for the local plan. No further action taken.</p>
1907	Martin Herbert	Brown & Co	Edward Walpole Brown	Context, Vision and Objectives	<p>Illustration again that insufficient consideration has been given Ansty Park. This is a significant and indeed a regionally important site for employment.</p>	<p>Allocate the development scheme detailed in our submission</p>	<p>To include suggested amendment would go beyond what is required within the NPPF.</p>

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1909	Paul Hill	RPS	St Modwen	Context, Vision and Objectives	<p>Generally supported but vision is silent on the Green Belt. The desire to protect the Green Belt surrounding the edge of Coventry from significant intrusion should be included within the overall vision for the Borough. Elsewhere in the Plan, such as Policy GP2 - Development Hierarchy states that development within the Green Belt will be resisted this needs to be reflected within the Spatial Vision to ensure consistency within the Plan. 5th para should also make reference to Lodge Farm alongside the urban area and MRS. Closing sentence of 8th Para makes reference to “Development will be accommodated in ways which reduces our carbon footprint as well as protecting and enhancing the area” is not clear, in what ways will development be expected to “protect and enhance the area” in this context? Further clarification of this is required otherwise it should be omitted.</p>	<ol style="list-style-type: none"> <li>1. Amend 5th paragraph to read: The majority of new sustainable housing and employment development will be focused on Rugby urban area. Sustainable growth of <b>the</b> main rural settlements <b>and new main rural settlement of Lodge Farm</b> will also.....</li> <li>2. Insert New Paragraph after the 4th paragraph: <b>Where exceptional circumstances have not been demonstrated the Green Belt will be retained to preserve its openness and the prevention of urban sprawl particularly around the edge of Coventry.</b></li> <li>3. Amend 8th paragraph to read ...Development will be accommodated in ways which reduces our carbon footprint as well as protecting and enhancing the area.</li> </ol>	Comments noted however no further action considered necessary

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1909	Paul Hill	RPS	St Modwen	Context, Vision and Objectives	<p>The objectives are generally supported but would be improved, as with the Spatial Vision, through the need to reflect the content of the Plan itself and the Framework. Specifically there should be a stronger acknowledgement of the Council's desire to protect and enhance the Green Belt in accordance with the requirement of paragraph 79 of the Framework. Elsewhere in the Plan, such as Policy GP2 - Development Hierarchy states that development within the Green Belt will be resisted this needs to be reflected within the Spatial Objectives to ensure consistency within the Plan.</p>	<p>Justification for the proposed changes is included in section 6 (above). New/amended is stated below: Objective environmental Insert new paragraph before Objective 7: <b>Protect and where possible enhance the Green Belt recognising the vital role that it plays within the Borough and specifically preventing unrestricted sprawl of large, built-up areas.</b></p>	<p>Policy has been formulated in relation to evidence base and is considered to be sound. (Therefore amendments not considered necessary or suitable).</p>
1940	Michael Burrows	Savills	Legal and General	Context, Vision and Objectives	<p>Supportive of spatial vision for sustainable growth of main rural settlements as well as Rugby Urban Area is sound. Rural housing need will be addressed and rural infrastructure and services supported.</p>		<p>Comments noted</p>
1940	Michael Burrows	Savills	Legal and General	Context, Vision and Objectives	<p>Supportive of spatial vision for sustainable growth of main rural settlements as well as Rugby Urban Area is sound. Rural housing need will be addressed and rural infrastructure and services supported.</p>		<p>Comment noted.</p>

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2064	Peter Wilkinson	Salisbury Investments Ltd	R Gale	Context, Vision and Objectives	The spatial objective should refer to previously developed land, consistent with NPPF Paragraph 111.	Spatial Objective 8 should be amended to read: "Protect the natural environment and species present in the Borough by making effective use of previously developed land and improving habitats through the enhancement of a green infrastructure network that supports natural and ecological processes."	Comments noted however no further action considered necessary
2064	Peter Wilkinson	Salisbury Investments Ltd	R Gale	Context, Vision and Objectives	Provision of specialised housing types for older people is supported and evidenced through demographic data.		Comments noted

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5196	Paul Hill	RPS	St Modwen	Context, Vision and Objectives	<p>Generally supported but vision is silent on the Green Belt. The desire to protect the Green Belt surrounding the edge of Coventry from significant intrusion should be included within the overall vision for the Borough. Elsewhere in the Plan, such as Policy GP2 - Development Hierarchy states that development within the Green Belt will be resisted this needs to be reflected within the Spatial Vision to ensure consistency within the Plan. 5th para should also make reference to Lodge Farm alongside the urban area and MRS. Closing sentence of 8th Para makes reference to “Development will be accommodated in ways which reduces our carbon footprint as well as protecting and enhancing the area” is not clear, in what ways will development be expected to “protect and enhance the area” in this context? Further clarification of this is required otherwise it should be omitted.</p>	<p>1. Amend 5th paragraph to read: The majority of new sustainable housing and employment development will be focused on Rugby urban area. Sustainable growth of <b>the</b> main rural settlements <b>and new main rural settlement of Lodge Farm</b> will also.....</p> <p>2. Insert New Paragraph after the 4th paragraph: <b>Where exceptional circumstances have not been demonstrated the Green Belt will be retained to preserve its openness and the prevention of urban sprawl particularly around the edge of Coventry.</b></p> <p>3. Amend 8th paragraph to read ...Development will be accommodated in ways which reduces our carbon footprint as well as protecting and enhancing the area.</p>	<p>Comment noted. Protection of GB is implicit within the NPPF and does not need repeating within the vision. Suggested wording is more guiding than that would be contained within a vision. Furthermore no specific reference to Lodge Farm is required in the vision as the vision needs to be reflective of the whole borough over the life of the plan. No changes recommended.</p>

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
5196	Paul Hill	RPS	St Modwen	Context, Vision and Objectives	<p>The objectives are generally supported but would be improved, as with the Spatial Vision, through the need to reflect the content of the Plan itself and the Framework. Specifically there should be a stronger acknowledgement of the Council's desire to protect and enhance the Green Belt in accordance with the requirement of paragraph 79 of the framework. Elsewhere in the Plan, such as Policy GP2 - Development Hierarchy states that development within the Green Belt will be resisted this needs to be reflected within the Spatial Objectives to ensure consistency within the Plan.</p>	<p>Justification for the proposed changes is included in section 6 (above). New / amended is stated below: Objective Environmental Insert new paragraph before Objective 7: <b>Protect and where possible enhance the Green Belt recognising the vital role that it plays within the Borough and specifically preventing unrestricted sprawl of large, built-up areas.</b></p>	<p>Policy has been formulated in relation to evidence base and is considered to be sound. (Therefore amendments not considered necessary or suitable).</p>
?	Gary Stephens	Marrons	Gallagher Estates / David Wilson Homes	Context, Vision and Objectives	<p>New spatial objective relating to boosting housing supply should be added as per rep to Preferred Options as there has been a persistent under delivery of housing in the early years of the plan period. Failure to deliver sufficient housing within the plan period will result in the spatial vision for the Borough not being achieved.</p>	<p>Recommend the following wording as spatial objective: 'to significantly boost housing supply within the Borough to meet future housing need and address the backlog of unmet housing need that has arisen during the early part of the Plan period as soon as possible'.</p>	<p>Policy has been formulated in relation to evidence base and is considered to be sound.</p>