

ID	Name	Organisation	Client (if applicable)	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
1378	Richard Allanach			DS3	<p>Objection to Policy DS3 as it over allocates countryside for more housing than is required; forecast methodology “commercially confidential” which cannot be tested and therefore cannot be relied upon; housing forecast produced prior to EU referendum which will result in lower demand for houses in Rugby and should be reflected in the towns projection of housing need; WCCH believe Rugby can accommodate 12-13,000 homes without a detrimental impact on congestion however an extra 22,000 homes resulting in gridlock at evening peak traffic; not specifically tested 20,000 homes proposed but reasonable to assume would also result in gridlock; DS3 unsound as alternative of faster build out at the former mast site, as suggested by DDC, has not been tested so policy is unjustified</p>		<p>Forecasting methodology in line with national practice. Consequences of Brexit on household projections not yet clear. Government maintains that local planning authorities must ensure continued working towards up to date adopted local plan. Household projections are the starting point for arriving at housing need. The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. Proposed Appendix 3 Infrastructure Delivery Plan and DS9 have been amended following consideration of this consultation response and the updated Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124). Potential impacts of proposed development on wider road network has been assessed as part of the STA. All sites proposed are required to maintain a 5 year land supply throughout the plan period. Makes provision for a larger housing land supply relative to its identified</p>

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							requirement, much of this is linked to longer term infrastructure investment and part of large urban extension sites which will remain developable beyond the Plan period.
1378	Richard Allanach			DS8	DS8 should be omitted; Rugby can provide 12,400 homes over the plan period without this allocation; failing that Ashlawn Fields should be removed from DS8; DS8 confusing as refers to South West SPD but document not in existence yet; SPD should be developed to show how DS8 would apply or unscrupulous developers may use lack of clarity to argue for lesser provision; link onto A4071 south of Potsford Dam not shown and open space in Ashlawn Fields insufficient; sustainable transport links not addressed; weaknesses in Policy highlighted, including references to SW SPD, parks and gardens provision in Ashlawn Fields; does not mention highways mitigation at Ashlawn Fields; DS8 doesn't mention linking green		All sites proposed are required to maintain a 5 year land supply throughout the plan period. Makes provision for a larger housing land supply relative to its identified requirement, much of this is linked to longer term infrastructure investment and part of large urban extension sites which will remain developable beyond the Plan period. South West SPD is listed in the Local Development Scheme to be consulted on at a later date; The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be

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					<p>infrastructure network to Cock Robin Wood; 40 mph road identified in the STA will not form a sufficient buffer; suggested alternative wording of policy included.</p>		<p>delivered. DS8 makes specific requirement of a buffer between Rugby and Dunchurch, which will be further detailed in the framework masterplan and adhered to in subsequent planning applications. The sustainable growth of the town and Borough to meet the needs of the community will be balanced with protection and enhancement of the Borough's historic environment and existing natural assets through the creation of a strategic green infrastructure network. Development will be accommodated in ways which reduces our carbon footprint as well as protecting and enhancing the area.</p>

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1378	Richard Allanach			HS4	Developers in Rugby have recently proposed off-site facilities which will not support the population of proposed developments; examples given of Barratts proposing inhabitants of a new development off Ashlawn Road would be served by facilities at Whinfield Park 3km away or enhanced facilities off Bucknill Crescent 4km away; revised wording suggested- "In such circumstances off-site provision towards local facilities should be made in a location within walking distance of the new development and a planning obligation may secure this"; otherwise HS4 is supported.		Comments noted. Open Space provision is subject to consultation with Sport England during any future Planning Applications.
1378	Richard Allanach			NE2	Support NE2- an excellent policy aligned with NPPF paragraphs 109-119; wish to speak should the Policy be challenged		Comments welcome

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1378	Richard Allanach			NE3 and Draft GI Map	Support NE3 but accompanying Draft Green Infrastructure Proposals Map inadequate; Rokeby and Overslade suffers existing deficit of approx 20 hectares of natural and semi natural green space; development of Ashlawn Fields would require 5 hectares of natural and semi natural green space to meet Policy HS4; County Ecologist stated 2 hectares of wildflower meadow required to offset loss of biodiversity caused by the development; GI map does not provide opportunity to address deficit- an opportunity area within the Ashlawn Fields area should be included.		The sustainable growth of the town and Borough to meet the needs of the community will be balanced with protection and enhancement of the Borough's historic environment and existing natural assets through the creation of a strategic green infrastructure network. Development will be accommodated in ways which reduces our carbon footprint as well as protecting and enhancing the area. The South West Allocation has a proposed Green Infrastructure network, developed in collaboration with key stakeholders.
1378	Richard Allanach			NE4	Support Policy NE4- excellent policy aligned with NPPF Paragraphs 109-119; wish to speak at examination should any developer wish to challenge the policy.		Comments welcome

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1378	Richard Allanach			Consultation	<p>Unlawfulness of the Local Plan; case law has established criteria for 'acting fairly' in relation to consultation, including consulting when proposals are at a formative stage, giving sufficient reasons for a proposal to allow for intelligent consideration; giving adequate time for the public to consider and respond to proposals and properly considering and responding to consultation responses; quotes case law stating decision must make clear representations have been taken into account- RBC has failed to meet these standards of fairness in consultation; as early as March 2016 that RBC sought advice from Warwickshire County Council about highway impacts of Lodge Farm yet proposal wasn't consulted on until 6 months later so RBC did not consult when the proposal was in its formative stage; examples of</p>		<p>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. Forecasting work in accordance with national practice. 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</p>

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					<p>area where RBC has not given sufficient reasons for its proposals to give intelligent consideration include- hiding consultants algorithms under cloak of “commercial confidentiality”, accepting 2,800 to meet Coventry’s needs without demonstrating why Coventry cannot meet its own needs, allocating 20,000 homes against a deemed need for 12,400; failing to explain why it has not considered impact of additional housing in South West Rugby A4071/B4453 junction and failing to engage the public on the Transport Assessment; Council launched its consultation before publishing all its evidence; Lodge Farm masterplan not available to the public for 6 weeks when the consultation closes; both Members of Parliament an Cllrs given insufficient time for consultation; RBC consulted on Preferred Options over Christmas 2015- results of this</p>		<p>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.</p>
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					<p>consultation not reported to full Council in July 2016 when advancing the publication draft was agreed so proper weight was not given to representations; report on earlier consultation not produced until September 2016; RBC should publish missing information, engage with the public on Transport Assessment, hold further consultation on its Local Plan, publish and consider representations and then produce a draft publication draft two prior for consultation</p>		

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1378	Richard Allanach			DS9	<p>RBC not produced necessary evidence to demonstrate DS9 can be delivered, transport assessment not released over preferred option consultation for scrutiny; from power point slides released by County Council the CC assumed that a link to the A4071 south of Potsford Dam would be possible although had reservations about the validity of this assumption and recommended further assessment given proposals meant crossing railway land; RBC pressed ahead without proper evaluation of this option went to Warwickshire County Council Communities Overview and Scrutiny Committee on 9 March 2016- minutes of meeting state that more detailed assessment was required but hasn't been provided with response that further work would be undertaken; not clear what evidence RBC had when preparing publication draft of Local Plan but it wasn't the</p>		<p>The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. STA has shown that proposed mitigation schemes reduce traffic flows through Dunchurch crossroads compared to the existing levels. Proposed Appendix 3 Infrastructure Delivery Plan and DS9 have been amended following consideration of this consultation response and the updated Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124).</p>

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					<p>Strategic Transport Assessment that was published for public consultation; work recommended in December 2015 and identified as “vital” in March 2016 not been undertaken; provides meeting minutes to demonstrate work undertaken insufficient; DS9 counter to NPPF Paragraph 154; publication draft of the Local Plan proposed a major expansion of the town without knowing that a connection between that expansion and the Western relief road could be provided; expansion to the South West overloads Potsford Dam roundabout on the A4071 requiring signalisation but the junction is of a poor standard but has levels constraints in improving it; road safety implications from poor visibility and the obstruction caused by the railway bridge, resulting in additional traffic affecting safety; Compared to the 2031 base case WCCH</p>		

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					<p>estimate an additional 1,251 vehicles in peak morning traffic- a 77% increase on the poor standard Potsford Dam; the alternative alignment south of Potford Dam is predicted to mitigate this increase as southbound traffic would no longer use Potsford Dam roundabout; B4642 alignment precludes the creation of an effective green corridor between the disused railway and Cawston Spinney; Neither DS9 alignment is feasible and one has known safety risks; WCCH recommend that the feasibility of the junction be investigated which has not been done nor has it been costed. In summary, RBCs case for a SW expansion of Rugby requires a connection between the SW and the Western relief Road south of Potsford Dam, WCCH had raised doubts on the feasibility of this connection as early as December 2015, March 2016 WCC stated work</p>		

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					<p>assessing deliverability of this option was “vital” and no assessment of the feasibility of this connection has been carried out; DS9 does not provide clarity for developers and is not effective as it is not known if it can be implemented; Policy DS9 should be withdrawn as DS8 is dependent upon the connection to the Western Relief Road so should be withdrawn- Local Plan identifies sites for 20,119 houses yet Policy DS1 states that 12,400 should be provided so DS8 can be withdrawn without changing Policy DS1.</p>		
1378	Richard Allanach			DS7	<p>DS7 fails to take account of Rugby’s educational needs; NPPF paragraph 72 requires RBC to take a proactive approach to ensuring sufficient space for new schools and Paragraph 37 requires the Local Plan to minimise journey lengths to school; cooperation between RBC, WCC and Education</p>		<p>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-</p>

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					<p>Funding Agency is required however the County Council has not clearly articulated needs and the Education Funding Agency has had no input; 2014 School Sufficiency Strategy stated Avon Valley School is at capacity and forecast to be over-capacity from 2015 onwards and a review of secondary education will take place in early 2015- through an FOI it is clear that the county council failed to conduct the promised review of secondary education in early 2015; 2015 School Sufficiency Strategy highlights shortfall of provision north of the West Coast mainline- by Sept 2020 an estimated 1,606 pupils will be chasing 1,100 places at Avon Valley School which the Gateway Site (with permission for 1,000 dwellings) and DS7 will exacerbate this; new homes in the North of Rugby cannot attend the school because of the 1.7 mile catchment area</p>		<p>140. Additional details will be finalised at the Planning Application stage.</p>

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					<p>operated by the school; pupils going from Coton Park East to schools in the South of Rugby will exacerbate existing capacity and air quality issues; attempts to locate a school to the North of Rugby have been flawed and finding a suitable site in the North of Rugby is not straightforward; sites identified listed- Education Funding Agency did not speak to RBC about finding a site; reason for not pursuing Coton Park site was due to Education Funding Agency commissioning the building of a road- either WCC or the developer could provide an access road to a secondary school site. Conclusion: There is a need for an additional secondary school in the North of Rugby, without additional secondary school the proposed Coton Park East development will be unsustainable and to make DS7 a viable policy it should be enhanced by allocating space for a secondary school.</p>		

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