

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

1428	Anne Denby	Canal & River Trust	NA	HS1	As highlighted in our response to the Preferred Option document the trust supports improving access to green infrastructure, which includes canals and the towpath.		Support noted
1687	Linda Tomalin	NA	NA	HS1	Policy fails to state how high quality and safe walking and cycling routes will be facilitated on existing roads which are already busy. The fact that there is a consideration to build a huge suburban area in the SW of Rugby and a "village" at Lodge Farm will destroy the areas which people enjoy already for their health and wellbeing and prevent access to other areas. More traffic in the area will discourage cyclists from roads, as well as make it dangerous for everyone, thereby negatively impacting upon the desired outcome of creating healthy, safe and inclusive communities.		Proposed Policy D1 of the Local Plan requires development proposals to prioritise sustainable modes of transport including safe and convenient access for pedestrians and cyclists. Concerning access to walking and cycling, Policy HS1 should be read in conjunction with Policy D1 for new development proposals. Sites proposed for allocation in the Local Plan will also need to address the implementation of walking and cycling improvements, or links to existing infrastructure, as required by Policies DS6, DS7, DS8 and DS10.
1869	Michael O'Connell	Amec Foster Wheeler	Warwickshire County Council	HS2	Object to requirement for all residential development above 150 dwellings to produce a HIA. Guidance advises HIA may be a	Amend policy wording so that health impacts are addressed on a district wide basis	Requirement in proposed Policy HS2 is considered to be consistent with NPPF to ensure that development does not have an adverse impact on human

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					useful tool where significant impacts are expected to arise from new development however we fail to see how new housing development alone would give rise to significant impacts on health. Health related issues from new development would be better addressed on a district wide basis.	rather than requiring individual developers to propose and implement health related measures.	health. Nonetheless proposed policy has been amended as indicated by modification LP54.67 to clarify the approach to securing mitigation for health infrastructure where a health impact assessment demonstrates a significant adverse impact from a development.
1875	Michelle Simpson-Gallego	Pegasus Planning	AC Lloyd / Persimmon	HS2	Requirement for HIA is onerous for development proposals over 150 dwellings. Considered to be Council's responsibility as part of IDP to determine infrastructure requirements over the plan period based on knowing the quantum and location of development. Unclear how this policy would work with CIL requirements and important double payments do not arise.		Requirement in proposed Policy HS2 is considered to be consistent with NPPF to ensure that development does not have an adverse impact on human health. Nonetheless proposed policy has been amended as indicated by modification LP54.67 to clarify the approach to securing mitigation for health infrastructure where a health impact assessment demonstrates a significant adverse impact from a development.
1875	Michelle Simpson-Gallego	Pegasus Planning	AC Lloyd / Persimmon	HS3	Sentiments of this policy are welcomed. In practical terms however, if facilities referred to in the policy are not in public use then the provisions should not apply as loss would be negligible to the local community.		The policy provides for the protection of local services and facilities that are essential for communities to access. Regardless of ownership of these facilities, their loss would be likely to lead to harm to the overall sustainability of local communities, contrary to the objectives of the NPPF.

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2068	Patrick Horton	NA	NA	HS3	Facilities are not within walking distance - Contrary to NPPF paragraphs references 30, 34, 37, 75 & 95.	Local Plan needs reviewing	Local Plan allocations focus the majority of growth on the most sustainable location within the Borough- the Rugby Urban Area. The Local Plan has been subject to a sustainability assessment and individual levels of additional services will be finalised during the Planning Application phase.
1428	Anne Denby	Canal & River Trust	NA	HS4	The supporting text to this policy has been updated to reflect the Trust's previous comments which are welcomed.		Support noted
1431	Mark Ryder (Jagjit Mahal, Lead Local Flood Authority)	WCC (Lead Local Flood Authority)	NA	HS4	8.15: Statement could be extended to include balancing ponds and other forms of SuDS to link to later sections.	-	Wording as existing considered sufficient. SuDs would still be a consideration in any proposal. Comments noted however no further action considered necessary
1453	Pete Lawrence and David Carter	Save Brandon Stadium Supporters Group	NA	HS4	SBSG believe Brandon Stadium should be protected from redevelopment until replacement provision is delivered. As yet no replacement site has been identified and crucially the alternative site is not identified in the emerging local plan. SBSG remains concerned at threatened closure of existing stadium and request RBC to consider the urgent designation of the site as a conservation area. Also understood that RBC may revisit decision not to designate site as an Asset of Community Value.	Proposed new policy (and supporting text) for Chapter 4: Brandon Stadium and Community Hub. In addition: - Section on local economy (starting para.2.13) should refer to Brandon Stadium as one of most important tourist facilities within the Borough - Policy GP2 should identify Binley Woods as a main rural settlement subject to housing growth proposals ensuring the continuity of Speedway and Stock Car Racing	Whilst not explicitly referred to in the Open Space, Playing Pitch and Built Facilities Study, the facility at Brandon Stadium would fall under the 'other sport and recreation activities' section which outlines that it is neither possible nor appropriate to devise formal planning standards for the kind of activity that would be in this wide ranging typology.

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						<p>- Para.3.15 - development of a new stadium would almost certainly involve development in the Green Belt - Policy SDC3 to make the observation that much of Brandon Stadium site cannot be considered a brownfield site; also Policy GP3 3rd bullet point should read "the impact of any heritage, sports, cultural or biodiversity assets". - Policy ED4 could usefully refer to Brandon Stadium which is an important driver to the local economy, for example in generating overnight stays</p> <p>- To note that the open space audit fails to recognise the activities that take place at Brandon Stadium, despite its claims to cover outdoor sports facilities.</p>	

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1637	Ian Bates	NA	NA	HS4	Appendix 4 is incomplete therefore Policy HS4 is also incomplete - 50 areas on map but only 49 are listed.		Area 50 on the Map shown in Appendix 4 relates to land not covered by a ward or parish in the Open Space Study (LP43). As explained in Part 4 of LP43 (para.2.17), this area of land has negligible impact on open space provision across the remainder of the Borough due to minimal population and the only open space within this area being reallocated to the adjacent Paddox ward. Policy is therefore formulated in relation to the evidence base and is considered to be sound.
1930	Narvinder Bains	PJ Planning	Heart of England Co-Operative Society	HS4	HS4: Open space and recreation' has a far higher standard of provision in urban areas for parks, gardens and green space typologies than the current actual level of provision. Given proposed populations growth levels, the standards could only be met through the demolition of existing development, which is unrealistic. The two typologies of parks and gardens and amenity green spaces should be combined into a single typology as residents treat them for effectively the same purpose. Combining the typologies would result in a new standard for urban and rural housing development. This is considered appropriate as the Open Spaces report for Rugby states that existing and proposed standards for parks and gardens		The proposed policy is supported by a robust and up-to-date evidence base in the form of the Open Space, Playing Pitch and Sports Facility Study (November 2015). This evidence takes account of locally specific circumstances in making its recommendations for policy formulation including open space standards.

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963	Mr & Mrs AA Kember	NA	NA	HS5	<p>are double the national average.</p> <p>Dangerous levels of NO2 at Dunchurch crossroads exceeding DEFRA guidelines which Local Plan will exacerbate due to increased congestion; bypass welcome but insufficient- more bypasses should be built before any development commences; suggests new bypass from A45 to Dipbar Field; link between A426 Southam Road at Toft linking up to Dipbar Fields and Cock Robin Island A426; irresponsible to advance Local Plan without addressing air quality issue; additional lane in the centre of Dunchurch will be detrimental to historic assets; infrastructure around Dunchurch needs improvement</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. 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.</p>

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1467	Clare Siddaway	NA	NA	HS5	<p>Concerns over an increase of traffic and pollution at Dunchurch crossroads. Population projections are too high as they don't take into account reduction of immigration due to Brexit. Warehouse development at the A45 near Thurlaston is inappropriate and will change the nature of the area. There is currently a lack of GPs and schools in the Dunchurch and Bilton area.</p>		<p>The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. Consequences of Brexit on household projections not yet clear. Government maintains that local planning authorities must ensure continue working towards up to date adopted local plan. Household projections are the starting point for arriving at housing need. WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140.</p>
1638	Ian Bates	NA	NA	HS5	<p>Policy HS5 should be about improving air quality not merely avoiding adverse impacts</p>		<p>Other policies in the Plan and measures contained in the IDP require sustainable transport measures to be implemented where new development is permitted in an effort to reduce reliance on the private car. It is not within the remit of</p>

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							the Local Plan to require new development to mitigate the impacts of previous development, in other words improve existing air quality conditions beyond the identified impact of the new development. The Borough Council's annual review of air quality (most recently published in 2016) sets out strategies for improving air quality in the Borough.
1687	Linda Tomalin	NA	NA	HS5	How can the negative effects of the traffic generated by all these new households, presumably each with at least one car, resulting in pollution, noise or vibration be effectively mitigated? We already see the effects caused at Dunchurch and in the town centre and this will only increase. Of particular concern is the amount of traffic to be generated to the SW Rugby area.		Proposed Policy DS8 requires the provision of an all traffic spine road and other infrastructure requirements to ensure the comprehensive development of the South West Rugby allocation and mitigate the modelled impacts of new development on the existing road network, in particular the Dunchurch Crossroads. DS8 will require sustainable transport measures therefore reducing the reliance on the private car. The delivery of the South West spine road as proposed in Policy DS9 is a necessary infrastructure requirement to support the delivery of the Local Plan.
1755	Brian Woolerton	NA	NA	HS5	I have a number of concerns regarding the proposed development. My principal concern is pollution which is already at a high level in terms of noise and air quality. It also seems to be a backward step to make a thriving village a suburb of a dying town.		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

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1756	Cllr K Lawrence	NA	NA	HS5	<p>The Rainsbrook Valley should be designated as part of the green infrastructure and any development should not be considered, Specifically the land that backs onto Barby Lane, High Street, Fellows Way, Florin Place, Duffy Place, Moat Farm Drive, Astley Place, Foresters' Place, Kilsby Lane, and Crick Road. The character of the landscape should be protected as it outweighs the need for further development. Hillmorton has the largest urban development in the borough and further development is not sustainable as the infrastructure with regard to GP provision, school places, transport links cannot cope with the current housing and population. The plan does not really factor in the strain that DIRFT places on Hillmorton. The policy numbers which relate to this are H55, NE1, NE3, NE4.</p>		<p>Rugby allocation.</p> <p>It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140.</p>

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2074	Paul Sanders	NA	NA	HS5	DS8 excessive as does not take into account of falling immigration due to Brexit lowering housing demands; half the population increase for 2013/2014 in Coventry and Warwickshire was due to international migration; no justification for taking some of Coventry's housing allocation; population projection models unstable with no consideration for lower level of net migration and potential for mass oversupply of labour; brownfield land should be prioritised as per NPPF Paragraph 17; concerns expressed in relation to worsened congestion and air quality- contrary to NPPF Paragraph 30; link road ineffective;		Consequences of Brexit on household projections not yet clear. Government maintains that local planning authorities must ensure continue working towards up to date adopted local plan. Household projections are the starting point for arriving at housing need. The 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.
2171	Richard Garside	NA	NA	HS5	Fails to meet NPPF para 30 on reducing traffic congestion and para 124 on air quality. Bringing cars to an already built up area seems not well thought through.		The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. The interim measures of an additional lane at Dunchurch cross roads has been found to be acceptable following called in decision for land at Ashlawn Road west, Rugby, Warwickshire (ref: 3147448 - 10 July 2017).

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1486	D Orton	NA	NA	HS5	Gyratory not coping with traffic. Queuing down Newbold Road and not enough parking at Elliott's Field.. Queue at Cock Robins wood at peak times. Queue when returning home from Blooms.		<p>The gyratory system was assessed as part of the STA; Warwickshire County Council have not identified the gyratory as a constraint on development. 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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2023	John Steele	NA	NA	HS5	<p>Concern in relation to the impartiality of the consultants; population projections have been treated as forecasts contrary to government policy; pollution levels at Dunchurch crossroads exceed EU limits which the proposed development would exacerbate; the development is equivalent in size to a small town with the corresponding effect on infrastructure; DIRFT should be accommodating the additional industrial units proposed; coalescence between Dunchurch and Rugby</p>		<p>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. The interim measures of an additional lane at Dunchurch cross roads has been found to be acceptable following called in decision for land at Ashlawn Road west, Rugby, Warwickshire (ref: 3147448 - 10 July 2017).</p>

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2034	Natalie Judge	NA	NA	HS5	Concern in relation to existing and future pollution levels. Proposals of a disproportionate size and lack of appropriate infrastructure		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140.
2100	Marie Le Nepveu	NA	NA	HS5	Increased congestion and pollution in Dunchurch. Proposed traffic mitigation scheme for Dunchurch was due to the Ashlawn Road development and does not take into account Lodge Farm. Insufficient protection for Dunchurch's Historic Assets. Safe access into Barby Road required. Concern in relation to loss of agricultural land and loss of wildlife. The industrial area		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. The interim measures

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					<p>alongside the A45 as part of the South West corridor will create light and noise pollution in close proximity to the Dunchurch Conservation Area and road safety concerns. Plan process should be led by local community and not developers. Question the validity of data. The consultation has not been effective in reaching all stakeholders.</p>		<p>of an additional lane at Dunchurch cross roads has been found to be acceptable following called in decision for land at Ashlawn Road west, Rugby, Warwickshire (ref: 3147448 - 10 July 2017).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. 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.</p>

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1443	J Morris	Sports England	NA	HS1 & HS2	<p>Support is offered for the principle that provides support for proposals which encourage healthy and active lifestyles. This is consistent with Government planning policy (section 8 of the NPPF) on creating healthy communities and consistent with Sport England's current strategy 'Towards an Active Nation'.</p> <p>The use of Health Impact Assessments for larger developments as part of EIAs is welcomed as these can help ensure that developments give appropriate consideration to how environments can be created which allow healthy and active lifestyles to take place.</p>		Support noted. No further action required.
1452	Public Health Warwickshire	Public Health Warwickshire	NA	HS1 & HS2	<p>HS1 lists promotion of healthy and safe places - there is nothing explicit to road safety. Road design should improve safety with traffic calming infrastructure including road humps and narrowing. The speed limit in retail and residential areas should be set to 20mph. Required the provision of decent housing, neighbourhoods served by active transport links, adequate provision of health, education and community facilities and space for sports and active lifestyles. Extractor fans or shielding should be installed on</p>		This is currently outside the Local Plan.

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					sites to limit dust and air pollution.		
2121	Michelle Simpson		Pegasus Group	HS2 & HS3	<p>There is no requirement to review the SHMA, so the data may become outdated and given its prepared on a Housing Market Area wide basis, the authority has less control over when the assessments will be revised. The SHMA reviewed housing mix on a borough-wide basis and does not consider locational differences, which may influence dwelling provision on individual sites. Housing mix should be decided on a site-by-site basis rather than a blanket requirement.</p>		<p>The representations highlight concerns relating to the soundness of the plan which need to be explored through the oral part of the examination.</p>