



**RUGBY BOROUGH COUNCIL
LOCAL PLAN CONSULTATION
STATEMENT
DECEMBER 2025**

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Introduction

The purpose of this consultation statement is to set out how the Council undertook its consultations and the findings that emerged from it, in the preparation of the local plan. The following document summarises how the Council consulted, who was invited to make representations, summarises the comments that were received and how we have responded to these in the evolution of the local plan.

This report has been produced in accordance with Town and Country Planning (Local Development) (England) Regulations 2012. This states that a Consultation Statement has to be produced to show:

- Which bodies and persons were invited to make representations under Regulation 18;
- How those bodies and persons were invited to make representations under Regulation 18;
- A summary of the main issues raised by the representations;
- How any representations have been used to inform the review.

Following completion of a public consultation under Regulation 20 of the Town and Country Planning (Local Development) (England) Regulations 2012, a summary of the representations pursuant to that consultation will be added to this statement. This statement will subsequently be submitted to the Secretary of State alongside the submission local plan, and assist the Inspector examining the plan in determining that requirements regarding public participation have been met.

Consultations carried out under Regulation 18

There is a degree of flexibility open to Local Planning Authorities in how they carry out the initial stages of plan production, provided they comply with the specific requirements in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, in respect of consultation, and with the commitments made within the Council’s Statement of Community Involvement (SCI).

Two stages of consultation were undertaken in respect of Regulation 18:

Consultation Title	Consultation dates
Issues and Options	31 October 2023 – 02 February 2024
Preferred Option	24 March 2025 – 19 May 2025

Following the ‘Issues and Options’ consultation, an Issues and Options Consultation Report was prepared and published. This illustrates how the feedback was taken into account, and is included in appendix 1. The Issues and Options Consultation Report also outlines how that consultation was undertaken.

Who was invited to make representations under Regulation 18?

In respect of both the ‘Issues and Options’ and the ‘Preferred Option’ consultations, there was an open invitation to any interested organisation or individual to reply. The Preferred Option consultation was publicised as set out below.

In addition, formal notifications of the consultation were sent to:

- Statutory bodies
- Duty to cooperate partners
- Parish councils
- Local councillors

The same notification was also sent to other organisations and individuals registered on the Development Strategy consultation database on the date that each consultation commenced. These were predominantly sent by email, with a number of hard copy letters sent by post.

Additionally, as locally elected representatives, both local ward councillors and representatives from parish councils were invited to briefings, as outlined below:

	Issues and Options		Preferred Option	
	Date and time	Venue	Date and time	Venue
Rugby Borough Councillors briefing	23 November 2023, 6pm	Town Hall	25 March 2025, 6pm	Benn Hall
Parish Councils	30 November 2023, 6pm	Town Hall	31 March 2025, 6pm	Benn Hall

How were the consultations publicised?

A communications plan was produced in respect of both the Issues and Options and the Preferred Option consultations, and was appended to the Council report seeking approval to commence consultation. The communication plan for the Preferred Option consultation is included in appendix 2, and the communications plan for Issues and Options consultation is appended to the relevant consultation report included in appendix 1 to this statement

The following methods were used to publicise the Regulation 18 Preferred Option consultation:

Method	Preferred Option consultation
<p>Bespoke webpage on the Rugby Borough Council website – included:</p> <ul style="list-style-type: none"> • Links to download consultation documents • Other locations to view the consultation materials • Short animated video about the local plan and the consultation • Details of how to respond to the consultation • FAQs • Details of scheduled in person drop-in events, and online events to find out more 	<p>Local Plan review Preferred Options consultation - Rugby Borough Council</p>
Press release	A press release was issued on at the start of the consultation.
Press notice	See appendix 3
Social media	<p>The objectives of the use of social media were to promote the consultation, highlight different themes and topics addressed by the local plan, and promote scheduled events. Social media posts included greater use of short edits of the video (published in full on the web page above).</p> <p>A summary of the social media analytics throughout the consultation is included in appendix 4.</p>
Leaflet	See appendix 5
Posters	Posters used to promote in person events.

How were people able to access the consultation materials?

Website

Much of the publicity directed interested persons to the relevant page of the Council's website (see table above). On the dedicated webpage the following were available:

- Links to view and download consultation documents
- Links to view and download evidence documents available in respect of the consultation documents
- Information on where hard copy versions can be viewed.
- Some introductory text to the consultation
- A short, animated video seeking to succinctly give information on the consultation
- The consultation period and deadline to receive representations
- Information on how to make representations, including the option to complete an online questionnaire (see appendix 6)
- The schedule on in-person and online events – an opportunity to get further information and ask questions
- FAQs

Hard copy access

Hard copies of the consultation materials were made available at the following locations in line with the Council's Statement of Community Involvement (SCI):

- Town Hall
- Rugby Central Library
- Dunchurch Library
- Wolston Library

Promotional leaflets (see appendix 5) and hard copies of the consultation questionnaire (see appendix 6) were included in these locations also.

Public events

A number of in-person and online events were held to give the opportunity to get further information and ask questions of officers. The schedules of those events are included below.

The format of the in-person events differed between the Issues and Options consultation and the Preferred Option consultation. This arose from the significant uplift in interest and attendance at Preferred Option stage compared to Issues and Options, and learning taken from the Issues and Options stage.

Issues and Options events

The Issues and Options events offered the opportunity to drop-in and informally ask questions and discuss the consultation with officers. The original schedule as below:

Drop-in date	Drop-in times	Location
14 November 2023	16:00-18:00	Cawston Community Hall , Scholars Drive, Cawston, CV22 7GU
16 November 2023	16:00-18:00	Brownsover Community Centre , Bow Fell, Rugby, CV21 1JF
21 November 2023	16:00-18:00	Dunchurch Village Hall , Rugby Road, Dunchurch, Rugby, CV22 6PN
28 November 2023	16:00-18:00	Rugby Art Gallery and Museum foyer , Little Elbow Street, Rugby, CV21 3BZ
04 December 2023	16:00-18:00	Brandon and Wolston Village Hall , 68 Main Street, Wolston, CV8 3HJ
06 December 2023	15:30-17:30	Wolvey Village Hall , The Square, Wolvey, LE10 3LJ

Hard copies of the Issues and Options Consultation Document were available, as were brief information leaflets. Individuals were able to drop-in at any point in the event time.

The drop-in events were not all well attended, and so a change of approach was adopted whereby officers sought to promote the consultation proactively by giving out the information leaflets and inviting questions within large local supermarkets as below:

Location	Date	Time
Tesco Supermarket, Leicester Road, Rugby	11 January 2024	11.30-13.30
Asda Supermarket, Rugby Town Centre	18 January 2024	10.00-12.00
Sainsburys Supermarket	23 January 2024	11-13.00

Additionally, two online sessions were held via MS Teams, with the link to join available from the webpage, as follows:

Date	Time
08 November 2023	19:00-20:00
17 January 2024	19:00-20:00

The first session on 08 November was run as an MS Teams 'event' with the officer hosts giving a short presentation, followed by questions submitted via the 'chat' function being answered verbally by officers.

The second session on 17 January was adapted to run as a regular MS Teams 'meeting', as attendance allowed. The same short presentation was provided (as on 08 November), but attendees were able to verbally ask questions to officers for answer.

Preferred Option events

In person events related to the Preferred Option consultation were arranged so that they took place in locations around the borough where allocations were proposed in the consultation. The schedule of events is set out below, along with an approximate number of attendees:

Date	Time	Location	No. of attendees recorded (approximate)
2 April 2025	6pm - 8pm	Knightlow CE Primary School , Hill Crescent, Stretton-on-Dunsmore	38
3 April 2025	6pm - 8pm	Dunchurch Baptist Church , Coventry Road, Dunchurch, CV22 6RF	86
7 April 2025	6pm - 8pm	Townsend Memorial Hall , 1 Lilbourne Road, Clifton upon Dunsmore	172
9 April 2025	6pm - 8pm	Rokey Room, BENN Hall , Evreux Way, Rugby, CV21 2LN	37
2 May 2025	6pm - 8pm	Long Lawford Lighthouse , School Street, Long Lawford	28
6 May 2025	5pm - 8pm	Brinklow Community Hall , 43 Broad Street, Brinklow, CV23 0LS	202
8 May 2025	5pm - 8pm	Wolvey Village Hall , The Square, Wolvey, LE10 3LJ	156

The approximate number of attendees was recorded and demonstrates a significant uplift in attendance compared with the Issues and Options consultation events.

In light of the elevated interest, the format of the events was amended so that there was a presentation from officers with slides, starting on the hour for each hour of the event. Additionally, large display information was presented on boards with officers available to answer questions. Display information was part related to the plan as a whole, and part focussed on specific allocations and matters affecting the local context (e.g. the Brinklow event included information specific to Brinklow, and the Stretton-on-Dunsmore event included information specific information regarding Stretton-on-Dunsmore and neighbouring Ryton-on-Dunsmore).



Images of the presentation arrangement adopted across Preferred Option events.

Additionally one online event was held as below:

Date	Time
10 April 2025	1pm - 2pm

This event was an MS Teams meeting style event.

How were people able to make representations?

Respondents were invited to submit their views in any one of the following ways:

- Online survey hosted by Survey Monkey – enabled respondents to answer a series of questions posed. The questions from the survey are included in appendix 6.
- By email, to localplan@rugby.gov.uk
- By post or by hand to the Council Offices

Summary of the Issues and Options representations

See appendix 1 – Issues and Options Consultation Report.

Summary of Preferred Option representations by respondent

A total of **4227** respondents are recorded to the Preferred Option consultation. In addition to this, a further **2069** hard copy letters relating to the omission site at Lodge Farm were received, so in practice the number of respondents is in excess of this. However, we are aware that within the 2069 letters some respondents have made duplicate submissions, and we have been unable to verify (within the available time) whether these letters are in addition to other forms of response.

Reps by respondent type:

Respondent type	Representation made online	Representation made by email/post	Duplicates (submitted both online and by email/post)*	Total
Statutory consultees and infrastructure providers	1	16	-	17
Neighbouring Authorities	1	5	-1	5
Parish Councils and residents' groups	-	28	-	28
Councillors and MPs	2	9	-	11
Site promoter	16	72	-9	79
Other organisations	2	17	-	19
Totals	22	147	-10	159

*where a respondent submitted more than one email, this is not classed as a duplicate and is already factored into the number of respondents.

The remaining responses were made by individuals.

Summary of Preferred Option representations

This section summarises and responds to comments made in the representations. These have been grouped by topic and attributed to a specific policy within the Preferred Options Consultation Document. Where a change is proposed to the policy/matter as a result, this is also noted.

Large numbers of representations were received from individuals in respect of individual proposed site allocations and the settlements in which they are located. As a result, responses received addressing sites and settlements have been attributed to policies S6 (residential allocations) and S7 (employment allocations) respectively and grouped by settlement. Some of these comments also relate to corresponding ‘development principles’ within the ‘Development Annex’.

Numbers in brackets next to each summary comment represent the number of similar comments noted. This is intended to give an indication of the relative frequency of the comments.

General comments

Plan period

Issue raised	Officer response
Support for plan period to 2045 (4)	The issues raised demonstrate mixed views on the plan period. Having reviewed and discussed feedback, it has been determined to proceed with a 15-year plan period – i.e. to 2042. The Regulation 19 plan will reflect this plan period.
Reduce plan period to 2042 18 years to more usual 15 years (9 (6PCs))	
Extend plan period to 2050 (3)	
Changing end date of plan would reduce housing requirement so almost all allocation in green belt could be removed (1)	As above, we are reducing the plan period. However, it is not the case that all green belt allocations can be removed as a result. Reducing the plan period means that fewer years of housing requirement need to be identified, but long-term supply for those years (for example at Houlton and South West Rugby), cannot be factored into the supply. The plan will still include allocations within the green belt.

Consultation process

Issue raised	Officer response
6 weeks is too short for a non-expert consultation period (1)	We acknowledge that there is a large amount of information associated with local plan consultations. Six weeks is the minimum statutory period for such a consultation, and this is reflected in the Statement of Community Involvement.

Parish councils were not consulted prior to the release of the Preferred Options document (3)	The consultation was made available to all at the same time, including Parish Councils. Parish Councils were invited to a bespoke briefing on the Preferred Option on 31 March 2025.
Consultation drop-in meeting did not allow for sufficient questions or time for residents to share views (1)	We welcome feedback on the consultation events, many of which were very well attended. We will reflect on this for the future. Whilst we are happy to hear views at these events, in line with the SCI responses needed to be made in writing in order to be considered through the consultation process.
Call for sites should be more transparent and publicised to attract more brownfield sites (1)	A second Call for Sites has been undertaken since the publication of the Preferred Options Consultation, specifically targeted at attracting urban brownfield sites. This forms part of the 'Urban Capacity Study' to be published alongside the Regulation 19 Plan.
Residents in allocation areas should have been directly informed via post to participate in the consultation (2)	It is not practical to write to every address. Anyone can request to be added to the Development Strategy Consultation database to be kept informed of all policy consultations – see Statement of Community Involvement.

Evidence documents

A number of critiques of documents and information in the evidence base were provided. These are summarised within appendix 7, and grouped by topic or document as appropriate.

The table below summarises some* of the comments received regarding evidence which was unavailable at the time of the Preferred Option consultation.

Issue raised	Officer response
Absence of evidence (STA, Level 2 SFRA, Green Belt Review) undermined consultation (2)	The Preferred Option consultation, which is a second consultation undertaken at Regulation 18 stage, is not a mandatory consultation in the plan making process. Some authorities (including authorities neighbouring Rugby) have moved from issues and options to a submission plan. The Council however felt it was important to demonstrate the direction of travel in an iterative process, whilst acknowledging that not all of the evidence base was yet complete and ready for publication. This allowed for further public engagement with the emerging plan.
No climate change/flood risk assessment published prior to consultation (1)	As above. We acknowledge that not all of the emerging evidence base was available at the

	time of the consultation. The Strategic Flood Risk Assessment (Part 1) was published alongside the consultation.
Numerous evidence packs and studies are still not started let alone completed and submitted for review (1)	As above
Recommend assessing the impacts of other policies such as design and climate on viability (1)	A viability assessment of the Preferred Options plan as a whole was published alongside the consultation. This will be updated in line with the Regulation 19 version.

**further comments relating to evidence documents not published alongside the Preferred Options consultation have been attributed to the 'Strategy' section, and the 'evidence critiques' so this is not an exhaustive list of comments on this matter.*

Additional content suggestions

Issue raised	Officer response
Insufficient consideration of waste collection (1)	Waste collection is a matter for detailed design proposals, to be considered at planning application stage.
Reflect whether the plan appropriately considers waste and the move toward a circular (more space intensive) circular economy in waste management (as opposed to the more traditional linear and discrete process of disposal) (1)	Waste planning is a Warwickshire County Council matter, and addressed through minerals and waste planning.
The plan does not appear to include any reference to cemeteries. Please include advice and recommendations to guide determination of planning applications (1)	Policy I4 seeks infrastructure where justified, and this could include cemeteries. Site 39 in Wolston is being amended to allow for expansion of the adjacent cemetery in response to feedback to the consultation.

Terminology

Issue raised	Officer response
'Country park' should be defined in glossary (1)	Following changes to the objectives and allocations post Preferred Options, reference to country parks is no longer included in the objectives. ,Nonetheless, a definition is added to the glossary as suggested.
Confusing use of both 'parks and recreation grounds' and 'parks and gardens' - Green Space Strategy definition is preferred (1)	The typology adopted in the emerging local plan is 'parks & recreation grounds' rather than 'parks & gardens'. The definition of the former is more expansive than the latter, which means that there are more 'parks & recreation grounds' recorded in the new open space study than there were 'parks & gardens' in the prior study. It is recognized

	that sites within typologies may vary considerably and this is captured by site specific assessments of quality and value. Please see the published Open Space Study.
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Other comments

Issue raised	Officer response
The draft plan breaches articles 6, 8 and 27 of the Human Rights Act 1998 (2)	We disagree. Local authorities are required to produce local plans within the legal framework. It is not considered any infringements of residents' human rights would occur as a result. The local plan aims to meet identified development needs in a planned way. An Equalities Impact Assessment will be published alongside the Regulation 19 consultation.
Strategic planning should be deferred until after local government organisation (1)	We disagree. This would leave Rugby without an up-to-date local plan for an undetermined period of time – likely years. This would result in planning by appeal and reduce the influence of the local community on decision making. Each of our neighbouring Warwickshire authorities are actively working on new local plans.
Proposal raises legal risks regarding non-compliance with the Environment Act 2021, Climate Change Act 2008 and Planning & Compulsory Purchase Act 2004 - require decisions in line with development plan unless material considerations indicate otherwise, and golden rules not met (1)	The local plan forms part of the development plan which decisions will be made against. We have updated relevant policies to reflect the 'golden rules' in national policy.

Objectives

The comments summarised in response to the objectives fall into two categories:

1. Those which discuss whether they think the objectives would be met
2. Those which would like to see amendments or additions to the objectives

These two categories are considered in separate tables below.

Category 1 – Meeting the objectives

Reasons for disagreement – question whether objectives would be achieved.	Officer response
Do not believe growth would be infrastructure led – two comments suggest this is because RBC does not deliver or	Opposition in these comments focusses on the wider plan and disagreement that the stated objectives would be achieved – i.e.

control delivery of infrastructure directly, and two others are of the opinion that the growth strategy with significant sites at villages would not be able to deliver infrastructure (4)	<p>they don't appear to directly oppose the objectives themselves.</p> <p>On this basis we do not think there is reason to alter the objectives based on these comments. However, we will seek to use feedback throughout this statement (and broader work on the emerging local plan), to ensure that we can demonstrate that the objectives would be met.</p>
Don't believe the plan would revive Rugby Town Centre (2)	
Too much of the green belt will be concreted over	
Destruction of local villages (2)	
Building in the countryside increases emissions (2)	
Criticism of a perceived continued focus of the plan on warehousing and distribution, and therefore a perceived lack of diversification as suggested by objective 1 (3)	

Category 2 – amendments and additions

Suggested amendment or addition	Officer response
Fully meeting Rugby's housing needs should be an objective, including affordable housing. (7)	Meeting Rugby's housing needs is a key driver of the local plan. It is a requirement of national policy, and necessary for the plan to be found sound at examination. As such it does not need to be identified as an objective.
The delivery of economic and residential development should be an objective (1)	As above, meeting development needs is a key driver of the local plan, and necessary in the context of national policy and for the plan to be found sound.
There should be greater emphasis on the industrial and logistics sector within the objectives. (2)	We don't agree, there was a lack on consensus on this with (as noted above) the opposite view also argued. The objective reflects the borough's Economic Strategy, whilst meeting identified development needs as set out in the evidence base.
Objectives should go further to build upon existing strengths, with specific reference to the economic growth objective. (1)	We think that in referring to the Economic Strategy the objective is appropriately worded.
Objectives should encompass the conservation and enhancement of the historic environment. (1)	We think we have embedded conservation and enhancement of the historic environment through the plan, and this is reflected elsewhere in the feedback from Historic England. Therefore, a specific objective in relation to this is not needed.
The importance of health and wellbeing should be included in the objectives. (2)	We recognise the importance of health and wellbeing. We think this is implicit within the objectives as stated. and have a section of the PO plan dedicated to this (i.e. 'Wellbeing'). Therefore, a specific objective in relation to this is not needed.

Objectives should include providing a decent home for all citizens (1)	We have adopted new policies to address this but do not propose to include this as an objective.
Clarify ambiguous terms – ‘diversification’, ‘emissions’ and ‘country parks’ (1)	<p>Diversification – is a principle in the Economic Strategy. On p7 it is stated as a long-term objective for growth to ‘diversify inward investment to ensure that our ideal location for logistics and transport does not create an overreliance on this sector.’ This objective is sufficiently self-explanatory.</p> <p>Emissions – we will amend the objective to refer specifically to carbon emissions as these are principally what policies in the plan seek to reduce.</p> <p>Country Parks – post Preferred Options amendments mean that reference to country parks have been deleted from the objectives of the plan. Nonetheless a definition is included in the glossary.</p>
Objective 3 to reduce emissions is not evidenced as being delivered - net zero evidence unpublished	Evidence to support policy CL1 will be published alongside the Regulation 19 plan to address this matter.
Objectives 1 and 3 should not be included in plan. 1 is not needed – why do we need growth and diversification. 3 is nonsense and has no place in this planning document (1)	We disagree. Objective 1 supports the Council’s Economic Strategy. Objective 3 responds to the Council’s declaration of a Climate Emergency.
Protection of the countryside should be an objective (1)	We recognise the strong opinions expressed throughout the feedback regarding protection of the countryside, and have included policy S5 regarding countryside protection. We do not agree that this needs to be an overarching objective, and would not be consistent with national policy or the strategy of the plan. Greenfield development is needed to meet development needs.
Objective 3 should not unnecessarily impact quality of life for residents – disagree with objective (1)	Noted. We think this is an important objective for the overall wellbeing of residents.

Strategy

This section summarises and responds to feedback received in response to the ‘strategy’ section of the Preferred Option Consultation Document. Summaries of comments attributed to each of the nine policies in this section (S1-S9) will follow a summary of comments which are attributed to ‘strategy’ generally but not directly attributable to a specific policy.

General strategy comments (i.e. could apply to housing and employment strategy policies)

- 29 general strategy comments were recorded

Summary of issue	Officer response
Greater protection of farmland needed to improve food security (1)	We acknowledge the need to protect farmland for food production. Agricultural land quality forms part of the constraints considered in the site selection process. Grade 2 agricultural land is noted in stage 2 site assessments (the best quality land in the borough).
Exceptional circumstances for Green Belt release not fully evidenced and justified (59)	We acknowledge that evidence regarding the green belt was not available at Preferred Option consultation stage. The Green Belt Contribution Study, and a topic paper setting out the case for exceptional circumstances will be published alongside the Regulation 19 consultation.
The flood risk sequential test should be applied at the earliest opportunity (1 EA)	Agree. The flood risk sequential test has been applied to all potential allocations and this evidence will be published alongside the Regulation 19 plan.
Support expressed for reasons given for strategy selection as set out in the Cabinet Report (1)	Noted.
The plan lacks sub-regional context and connections. (1)	We disagree. The plan has evolved, and continues to evolve, based on jointly prepared evidence (e.g. the Housing and Economic Development Needs Assessment and the West Midlands Strategic Employment Sites Strategy), and discussions with our Duty to Cooperate partners. See the Duty to Cooperate Compliance Statement for further information.
The plan fails to acknowledge the West Midlands Investment Zone. (1)	The West Midlands Investment Zone is located adjacent to the administrative boundary of Rugby Borough. Officers have been engaging with colleagues at Transport for West Midlands and Coventry City Council in relation to this as set out in the Duty to Cooperate Compliance Statement.

<p>Plan prepared prior to receiving Strategic Transport Assessment (1)</p>	<p>This is true, and the Strategic Transport Assessment (STA) has since been produced and will be published alongside the Regulation 19 plan. In order to produce the STA, a list of proposed allocations was necessary, along with potential alternatives to be tested. We were not able to produce this prior to the Preferred Option consultation, but it was judged to be important to run the consultation and demonstrate a direction of travel in the plan making process.</p>
<p>Plan has been drafted prior to evidence base being completed (1)</p>	<p>As set out in response to similar comments, we recognise that not all evidence documents were complete and available at the time of the Preferred Option consultation. However, it was judged to be better to run the second Regulation 18 consultation (which is not mandatory) and demonstrate how the plan was emerging, than potentially move straight to a Regulation 19 consultation upon completion of all of the evidence. The plan-making timetable did not allow for the Regulation 18 consultation to await the completion of all of the evidence base, due to the deadline to submit a plan before the plan making process changes (in 2026), plus the implications of local government reorganisation. By consulting while plan making was ongoing rather than waiting and consulting only once the plan was completed we allowed changes to be made in response to feedback from those responding to the consultation.</p>
<p>Hinckley and Bosworth Borough Council reserves further comment on soundness in relation to green belt, until the relevant evidence base is completed. (1)</p>	<p>Noted.</p>
<p>Strategy is inconsistent with housing allocations – claims to allocate most development at Rugby but majority of allocations are rural (7)</p>	<p>The report to Council regarding the Preferred Option consultation identified that the majority of new housing would be delivered at the Rugby urban area, when existing commitments are taken into account. In light feedback and further evidence, the Regulation 19 plan will include new allocation sites at the Rugby urban area, and some of the Regulation 18 allocations at Main Rural Settlements either deleted or reduced in capacity.</p>
<p>Lack of rural transport strategy to reduce number of additional car journeys from housing and employment (1)</p>	<p>The strategy includes draft site allocations in rural settlements. These are predominantly ‘main rural settlements’ that have been assessed for sustainability (see Rural</p>

	Sustainability Study). The Local Cycling and Walking Infrastructure Plan and the Bus Service Improvement Plan have been identified in the Strategic Transport Assessment (STA) as necessary to achieve modal shift assumptions made in the STA. On that basis, these schemes have been included in the infrastructure schedule included in the evidence base.
Brownfield sites should have been reviewed first and greenfield/green belt sites only considered once they have all been discounted (1)	Following the Regulation 18 consultation and Urban Capacity Study was prepared to identify additional urban capacity. This informs the Proposed Submission Local Plan.
Sites which might impact the Strategic Road Network (SRN) should be supported by detailed transport assessments addressing both direct and cumulative impacts on the SRN (1)	Agreed. A Strategic Transport Assessment (STA) has been produced since the Preferred Option consultation. This addresses direct and cumulative impacts and will be published with the Regulation 19 plan.
A level 2 SFRA must be produced prior to the next stage of consultation (1)	Agreed. This has been produced and will be published as part of the Regulation 19 consultation.
Recommend policies ensure that appropriate assessment and mitigation can be carried out by the agent of change (i.e. residential allocations) (1)	The agent of change principle is reflected in national policy – no need to repeat locally.
Site selection must be based on appropriate environmental assessments - see comments re SEA/SA on evidence tab (1)	We agree. Site selections are led by the evidence base.
An National Grid Electricity Transmission asset is within the plan area - 4WP Route TWR: 400Kv Overhead Transmission Line Route Coventry-Ratcliffe on Soar and Hams Hall-Willington East (1)	Noted. This is not close to proposed allocations.
Plan does not mention Duty to Cooperate (1)	Discussions under the Duty to Cooperate with relevant have been ongoing throughout the plan-making process (and before) and continue to be ongoing. A Duty to Cooperate Statement will be published to set this out in detail.
More input from Warwickshire County Council (WCC) is required – should be listed under Duty to Cooperate (1)	Refer to Duty to Cooperate Statement, and representation in response to the Preferred Option consultation. WCC has jointly commissioned the Strategic Transport Assessment with Rugby Borough Council, and liaison is ongoing regarding school places and other WCC functions.
Allocations near the A5 not supported. Significant constraints (1)	We are aware of constraints on the A5, and have been mindful of this through site

	selections. The Strategic Transport Assessment considers impacts on the A5.
Country parks are unlikely to be biodiverse, especially when surrounded by or in close proximity to housing and employment sites (2)	Biodiversity net gain is now a requirement and is referenced in the 'Environment' section of the Preferred Options document.
2016 Landscape Sensity Study has been disregarded in favour of an in-house RBC 2025 reassessment (1)	The 2016 Study considered broad areas. The 2025 assessments consider the sensitivity of individual sites. There are therefore methodological differences which result in some differences. The largest sites were assessed by independent consultants, and the in-house assessments of smaller sites have been independently verified by independent consultants to ensure consistency in the evidence base. Planning Inspectorate guidance indicates that evidence should be up-to-date which generally means published within the past two years.
Coventry surplus eliminates need to build on Green Belt (3)	Coventry City Council has indicated in its submission local plan that it can meet its own housing need. It has not indicated a surplus that could contribute to Rugby Borough's need.
Green belt is not being given the highest level of protection – all other options should be considered and exhausted first(3)	Assessment of the green belt will be published at Regulation 19 stage, which includes assessment of grey belt as introduced in the NPPF. An exceptional circumstances paper will set out the exceptional circumstances we think exist.
Plan should incorporate two strategies for Urban and Rural (1)	We disagree. The strategy has to consider the borough as a whole and how best to meet the identified development needs.
Costs of upgrading utilities and road infrastructure are not estimated or shown in a risk register	A viability assessment of the whole plan has been undertaken. This includes cost estimates of infrastructure, which is included in the infrastructure schedule.
Plan should aim to deliver a 15-minute community approach in the borough (1)	A 15-minute neighbourhood approach, seeks to meet all the day to day needs of residents within a 15-minute walk from home. The plan seeks to incorporate opportunities to improve and enhance opportunities for active travel, through for example development requirements in the annex. In addition, the strategy seeks to allocate sites where there is existing infrastructure and amenities. Whilst the plan does not explicitly adopt a 15-minute neighbourhood approach therefore, we think it does seek to promote some underpinning principles.

Rugby is cited as one of the fastest growing towns but this has not impacted its targets – targets seem to constantly increase (1)	Land to meet identified needs for the proposed plan period increases the requirements because the plan looks further into the future.
Harmful effects of worsening air pollution from previous plan allocations already being felt -adding more development allocations will only make this worse (1)	Noted. Policy EN8 addresses air quality and new development. New allocations are needed to meet identified development needs.

S1 – Settlement hierarchy

- 18 comments were attributed to this policy specifically (including the comments of support below)
- 8 expressions of support for this policy were received, with comments including:
 - Support for some dispersal to rural areas (2)
 - Support scale of growth commensurate with services and facilities of settlements
 - Support smaller and medium sized sites at main rural settlements
 - Effectively duplicates GP2 of the adopted local plan

Policy S1 - Settlement hierarchy		
Summary of issue	Officer response	Proposed change
Site allocations don't align with settlement hierarchy – specific reference to allocations at Ryton on Dunsmore and Ansty (2)	This representation does not challenge the proposed hierarchy as presented in policy S1, rather allocations as part of the strategy later on. This will be considered under S3 and S7 + see response to comment below regarding different requirements for employment allocations (compared to housing allocations). The allocations at the edge of Coventry for employment land are not intended as extensions to the villages – these are strategic.	Add paragraph to supporting text
Settlement hierarchy should recognise Coventry urban edge (1)	Whilst the role of Coventry City is recognised through both the spatial strategy and through Duty to Cooperate, we do not agree that it is appropriate to place Coventry within the settlement hierarchy in S1. Coventry City is beyond the administrative boundary of Rugby Borough. Similarly, other settlements outside of the borough including Nuneaton, Bulkington,	

	Hinckley and Burbage are not included in the settlement hierarchy.	
Dunchurch should be included as a settlement to which development should be directed (1)	We agree, and this is supported by the Rural Sustainability Study. Dunchurch is also categorised as a 'Main Rural Settlement in the adopted local plan. This was omitted in error at R18 stage.	Insert Dunchurch into the list of Main Rural Settlements.
Dunchurch omitted from S1 settlement hierarchy (1)	As above.	As above
Opportunities to expand the Rugby urban area further should be explored (1)	This representation does not challenge the proposed hierarchy as presented in policy S1, rather allocations as part of the strategy later on. This will be considered in respect of policies later on. A large omission site has been considered at North West Rugby (referred to as 'Cosford'), but the evidence base has not led us to conclude this is a preferable and deliverable option – see 'Omission sites'.	
Wolvey and Wolvey Heath should be considered as separate settlements. Wolvey Heath should be categorised as 'other rural settlement' (4)	Wolvey Heath is referenced in the Rural Sustainability Study as not being included in the study (p8), due to its small size (82 dwellings). It is recorded as 'counted for in combination with nearby larger village (Wolvey)'. Therefore whilst the separate nature is recognised, Wolvey Heath is of insufficient in size to be categorised as a 'other rural settlement'.	
Newton is comparable in sustainability terms to a number of the Main Rural Settlements (1)	In recognition of the relative sustainability a draft allocation has been included at Newton. The relative sustainability of settlements is set out in the Rural Sustainability Study.	
Break down housing requirement by tiers of settlement (1)	This comment does not relate to hierarchy itself but to the strategy for distributing housing growth which will be addressed in later policies. The hierarchy has guided the spatial strategy, which must also take account of available, deliverable land.	

	We have included a calculation for neighbourhood planning areas within the Regulation 19 plan.	
Text should refer to differing requirements of employment development. For example, it should be close to strategic road network and have sufficient electricity supply (1)	Agree, and this links to the comment above regarding proposed large employment allocations not following the settlement hierarchy. We will add a paragraph to clarify that this is the intention.	Add paragraph to S1
Amend settlement boundary around Houlton (2)	Agree to amend in line with information provided by the developer.	Amend settlement boundary at Houlton
Long Lawford should be recognised as more accessible than other main rural settlements (1)	Accessibility is considered alongside other factors in the Rural Sustainability Study, and has been a factor in the site selection process alongside many other considerations. We do not therefore agree there is a need to amend the hierarchy.	
Illogical to score villages highly for amenities that are overcapacity (1)	The methodology for the Rural Sustainability Study is set out within the document, and relative access to different types of facilities and amenities are reflected. Capacity of infrastructure and additional needs arising from development are being considered through the plan making process.	
Main rural sites are too large to be developed quickly but too small to deliver infrastructure improvements (1)	The speed of delivery is relative. We consider these sites are likely to start delivering housing more quickly than would be the case if another large strategic site were selected, and this is important in demonstrating supply. The largest allocation proposed at Regulation 18 stage at Wolvey has now been reduced in size. Infrastructure improvements required will vary by settlement according to existing provision and capacity, and the impacts of the development allocated.	
Additional clause that development should be proportionate to the existing settlement – appropriate layout (1)	Additional text is added to Policy S1 to address this point.	Amendment to Policy S1

S2 – Strategy for homes

- 448 comments attributed to this policy, (including the comments of support below)
- 7 comments of support for this policy (see below)

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
Support		
Support for the housing target and land supply buffer of 9% as this will provide flexibility, ensure housing needs (including affordable housing) are met, and help the Council consistently demonstrate a five-year housing supply. (3)	Noted.	None
Support - Given the availability of sites that can deliver more quickly, a stepped trajectory to support another SUE wouldn't be consistent with government goal to build 1.5m homes within this parliament (1)	Noted	None
Support selection of a range of small and medium sized sites. Reliance on further strategic scale sites (in addition to existing) risks delivery, plus strategic sites are currently nil rated for CIL so smaller scale sites contribute financially (1)	Noted	None
Support - More balanced spatial approach. Vitality of main settlements. Avoids large complex sites - deliverability and viability (1)	Noted	None
Fully support - consider sound and justified approach, supported by the evidence base (1)	Noted	None
Housing numbers		
The plan should not treat 618 dpa figure as a maximum - minimum housing requirement (3) Express housing requirement as a minimum – para 62 of NPPF (1)	NPPF paragraph 15 states that the planning system should be genuinely plan-led. It would be contrary to this objective and would undermine local public confidence in the planning system to set an open ended target with only a minimum. The requirement of national policy is to identify a requirement which meets minimum need, that is what the plan does. It identifies sufficient	

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
	supply plus headroom to meet that requirement. In these circumstances, where full assessed needs are being met, there is no need to express the housing requirement as a minimum.	
618 homes per annum not justified - appears not to take account of latest data – should be 625 dwellings/annum (3) Update to latest standard method figure (3)	We acknowledge that affordability ratios were updated at a similar time to the publication of the Preferred Option. Stock estimates were subsequently updated. When applied in the standard method, the outcome is 636 dwellings per annum, and this will be reflected in the Regulation 19 plan.	Update the annual housing requirement from the standard method.
Housing requirement modelling is unsound – doesn't consider phasing and speeding up of delivery at Houlton (1)	The local plan seeks to allocate land to meet the development needs of the borough for the new plan period. The Local Planning Authority also has to have a trajectory of that development across the plan period, and demonstrate a 5 year land supply. All of these have influenced the strategy for delivering housing derived from the standard method. The council cannot through policy or otherwise control the speed of delivery at Houlton.	
Housing figure based on New Standard Method overestimates requirements - figure would be 525dpa under the old SM. Higher HEDNA figure is based on assumptions which no longer apply. (1)	The housing figure is based upon the most recent Standard Method set out by government. This is the method that councils are expected to use. Older standard methods no longer apply. The housing need calculation has not relied upon the HEDNA.	
Affordable housing – the overall housing requirement should be increased to deliver affordable housing need. (11)	See Development Needs Topic Paper which refers to this issue.	
Windfall allowance should be deleted from first 3 years of plan period to avoid double counting (3) Windfall allowance -	There is no double counting because windfalls are only fewer than 5 units, and permissions of that size are not specifically	

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
<p>Need compelling evidence and NPPF compliance. Consider should be reduced to 900 - 18 rather than 21 years of windfall supply (2)</p> <p>Windfalls should not be included in the in the plan’s housing requirement supply – should be in addition to the buffer to the standard method figure (1)</p>	<p>counted in the supply for the first 3 years.</p> <p>A new topic paper will be produced to set out the evidence for small site windfalls, including completions by year.</p>	
<p>Current windfall figures are an underestimate (2)</p>	<p>The windfall assumption is based on evidence of historic windfall supply. This includes sites developed for r fewer than 5 dwellings as the delivery of larger windfall sites is inconsistent. A new topic paper will be produced to set out this evidence. There is not evidence of consistent supply to support inclusion of a windfall supply for larger sites.</p>	
<p>Consider use of an annual windfall figure unsound (2)</p>	<p>As above, the windfall assumption is based on historic evidence of supply, and evidence for this is to be set out in a new topic paper.</p>	
<p>9% buffer is inadequate (7)</p> <p>15-20% buffer should be applied in line with other councils (unspecified) (1)</p>	<p>See Development Needs Topic Paper.</p>	
<p>Lack of evidence for a 9% buffer (1)</p>		
<p>Non-implementation allowance – 10% rate should be applied to all allocated sites (1)</p>		
<p>9% buffer exceeds the minimum 5% - unnecessary allocations (2)</p>		
<p>No reference to how the 2022 Coventry and Warwickshire HEDNA has informed the strategy for housing growth despite being part of the evidence base (1)</p>	<p>The HEDNA remains relevant to the employment strategy and to elements of housing policy included in the Preferred Option. However, following the introduction of a revised standard method, this has formed the principal basis for determining housing need, though in practice, the standard method output is</p>	

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
	relatively similar to the HEDNA outputs.	
Slowing of build out at Houlton should be accounted for (2)	The trajectory for Houlton is considered in the housing supply. Historic dependence on the delivery of large-scale sites such as Houlton and South West Rugby is part of the rationale for diversifying the type and scale of sites we are proposing to allocate.	
Efforts should be concentrated on speeding up delivery at major sites not allocating new ones – Houlton and SW Rugby cited (2)	We are seeking to expedite delivery of these sites, but also need to identify additional supply.	
Potential unmet need from elsewhere		
Potential unmet housing need from Coventry (3) Coventry likely to have unmet housing need as it isn't planning for the full range of housing required (1)	We are working closely with officers at Coventry City under the Duty to Cooperate. At the time of writing Coventry City Council has submitted its local plan, and has identified no unmet housing need.	
Local plan evidence should consider potential for additional housing from West Northants (1)	We have been and continue to work with West Northamptonshire Council under the Duty to Cooperate. No evidence has been provided to date regarding unmet need from West Northamptonshire.	
Coventry City's plan to meet its own housing needs yet to be tested at examination and NBBC due to commence work on a new local plan once recently examined plan is adopted - NBBC reserve the right to ask RBC to help meet its need (1)	Regarding potential unmet need from Coventry City – see response above on similar point. We will continue to work with NBBC under the Duty to Cooperate on all strategic matters. At the time of writing, there is no evidenced unmet housing need from NBBC.	
Spatial distribution and infrastructure		
Disagree with dispersal strategy - consider contrary to objective 5. Prefer large standalone developments with onsite infrastructure provision (50)	Dispersal does not represent the entire spatial strategy. The report to Council in March 2025 indicated that around 70% of new homes would be delivered at the Rugby	

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
	<p>urban area, when existing commitments are included. The spatial strategy still includes two large urban extension sites, which have been delivering housing at a slower rate than anticipated. Therefore, the Preferred Options has sought to diversify the supply for the additional need in the new plan period.</p> <p>In selecting preferred residential allocation sites, regard has been given to the existing infrastructure and its capacity, as well as the opportunities for new or enhanced infrastructure in each location. The Regulation 19 plan includes additional site allocations at and within the Rugby urban area.</p>	
<p>Dispersal strategy contradicts the NPPF – urban extensions and Garden Villages preferred nationally (2)</p>	<p>This is not correct. The NPPF does not express a preference for a particular spatial strategy. Paragraph 77 NPPF states "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)". In reflection of this a large proportion of new homes being delivered during the plan period will be at South West Rugby, Eden Park and Houlton. However, there is also a need per NPPF para 73 to deliver small and medium sized sites.</p>	
<p>Further housing at Rugby town likely to exacerbate infrastructure issues (2)</p>	<p>The large housing development sites listed under policy S2 (other than those allocated in S6) are</p>	

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
	<p>already allocated in the adopted local plan and some benefit from planning permission.</p> <p>Infrastructure requirements for these have been identified. New allocations identified under S6 have regard to existing and necessary infrastructure.</p>	
No further growth within Rugby urban area due to traffic constraints (1)	<p>As above, much of the growth identified at Rugby is already allocated in the adopted local plan. New allocations at Regulation 19 will be included within the town centre and on brownfield sites, the principle of which has been encouraged through consultation feedback summarised in this report. The Strategic Transport Assessment models the effect of the Proposed Submission Plan on the operation of the highway network.</p>	
Too many new build estates in Rugby already – they do not impact house prices and are unaffordable (2)	<p>We have to plan for the identified housing need of the borough, and have proposed a strategy which diversifies the strategy from the current and previous approaches. The affordability of housing has influenced the spatial strategy and policy H2 seeks to maximise the proportion of affordable housing on new developments. National policy requires councils to plan to meet assessed local housing need using a formula set out in national policy and guidance. That formula includes an ‘affordability uplift’.</p>	
Further residential growth should be apportioned to Rugby. Linked to delivery of secondary school (1)	<p>This is the opposite view to that expressed above.</p> <p>The need for a secondary school was explored in detail – see the Education Topic Paper.</p>	
Increased densification of housing needed in the town – more apartments and smaller homes (1)	<p>Noted. The Regulation 19 plan includes additional urban site allocations based on the Urban Capacity Study.</p>	

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
Delivery delays at Rugby town sites wouldn't necessarily apply to Lodge Farm – Lodge Farm would not be an urban extension (1)	Noted. Lodge Farm is a 'reasonable alternative' site as outlined in the SA. Reasonable alternatives are tested further through the evidence base.	
Too much reliance on large sites – historic trajectories have not been delivered (2) An over reliance on larger sites still (1)	The largest proposed new residential allocation in the Preferred Options consultation was 500 homes. In the Proposed Submission Local Plan the largest allocation is for 400 homes. The largest residential allocations (South West Rugby and the remainder of Houlton) are existing allocations in the adopted local plan. We have sought to diversify the range of site sizes in the new allocations so that supply is less reliant on slower moving large sites.	
Rural allocations are unsustainable due to car dependency and lack of facilities, more housing is needed in the town centre/brownfield sites instead (274)	We have identified and will incorporate more brownfield sites into the Regulation 19 plan. The Urban Capacity Study supports this. Whilst the allocations proposed in policy S6 include rural sites (predominantly at Main Rural Settlements), the majority of the housing allocations remain focussed on Rugby town. The Rural Sustainability Study identifies the most sustainable rural settlements. These are the focus of new housing in the plan. The largest rural allocations are at Long Lawford, which has the best public transport and active travel links. The overall level of housing proposed in the rural areas is proportionate to the scale of the rural population of the borough and there is a strong justification for housing to support rural sustainability.	

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
Scale of growth allocated to rural/ Green Belt settlements is unsustainable – overdevelopment (5)	Policy S1 sets out the hierarchy of settlements to which the strategy relates, with housing allocations directed predominantly to Rugby or Main Rural Settlements. Main Rural Settlements have been identified due to existing facilities and services in the village. The scale of allocations at Main Rural Settlements was reviewed prior to Regulation 19 stage and in some cases amended.	
Alternatives available to allocating on Green Belt/rural sites (1)	We have considered a range of sites for allocation. These are considered through the HELAA and the Stage 2 site assessment, where reasons are given for the progression or non-progression of each. Further, a paper setting out the ‘exceptional circumstances’ for green belt sites will be published with the Regulation 19 consultation.	
Lack of infrastructure in the villages to sustain new houses (4)	See response above.	
Allocations skewed to greenfield sites (93%) – against national policy (2)	We will include additional brownfield sites in the plan, based on evidence from the Urban Capacity Study and other sources. This will increase the overall proportion of brownfield allocations. We are therefore seeking to make as much use as possible of previously developed or brownfield land as required by national policy (see paras 124 and 125 of the NPPF).	
Loss of identity for villages (1)	Settlements are constantly evolving, but we recognise that the extent of change/growth put forward in the Preferred Option consultation was significant in some villages. We have reflected on the feedback in relation to specific settlements and sites (see policy S6 summary), and the latest information in the evidence base.	

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
	In some locations we have reduced the scale of housing growth.	
Concern regarding the potentially overwhelming impact of dispersed small-scale developments on primary care already operating at capacity (1 ICB)	We are continuing to work with the Coventry and Warwickshire ICB as we work toward Regulation 19. This is referenced in the Duty to Cooperate Statement, and it is our intention to agree a Statement of Common Ground (SoCG) regarding primary care.	
Prefer larger scale growth areas that can deliver Primary Care facilities plus other community facilities - keen to work with the Council to deliver community hubs (1 ICB)	Noted. As above, we are continuing to liaise with and work with the ICB.	
Lodge Farm has the potential to provide new infrastructure to the benefit of new residents and Dunchurch. Cosford would be in close proximity to Rugby (1 WCC)	We recognise this point, which is why both Lodge Farm and Cosford are considered as 'reasonable' alternatives' in the Sustainability Appraisal. However the Viability Study demonstrates that the challenges of viably delivering new infrastructure in these locations.	
Lodge Farm (site 73) would be WCC's preferred site (1 WCC)	Noted. Lodge Farm has continued to be assessed as a 'reasonable alternative' but has not been included as an allocation for reasons set out in the evidence base, including highways impacts and viability challenges.	
Lodge Farm should be deleted as a reasonable alternative (1)	Lodge Farm has been carefully assessed. The final Sustainability Appraisal report considers whether it should remain in reasonable alternative growth scenarios assessed therein.	
Inclusion of Lodge Farm as a 'reasonable alternative' is a breach of res judicata – disregards previous inspector's findings (1)	Lodge Farm was not included as an allocation in the Local Plan 2011-2031, but we think it was appropriate and necessary to consider it as part of the preparation of the new plan.	
Social care and primary care should be discussed further with ICB and social care providers to look at most viable options if rural sites are to be part of strategy (1 WCC)	Agree. We will continue to discuss these matters with our Duty to Cooperate partners.	

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
Rural developments often focused on larger family homes which will be unaffordable to many, larger urban estates have more scope for smaller and starter homes (1)	Policy H1 refers to housing mix, and is intended to ensure an appropriate mix of dwelling sizes. Policy H2 sets out affordable housing policy, with a larger proportion of affordable housing required on sites outside the Rugby urban area. This combined with experience on some larger sites which have underdelivered affordable housing for viability reasons evidences why we think a more diverse strategy will deliver more affordable housing.	
Housing growth at Clifton upon Dunsmore unduly restricted by primary school capacity (1)	We have had regard to primary school capacity through site selection across the borough, including Clifton. This is because we want primary age children to have the opportunity to attend their local primary school, and limit pupils travelling greater distances by car where possible. Further education modelling has been undertaken since the Preferred Option consultation, and the findings will be published at Regulation 19 stage.	
More of the proposed housing should be in Rugby town where transport links already exist & cars aren't needed. There should also be more apartment blocks/housing with shared recreational areas. (1)	As set out in responses above, additional Rugby urban area sites have been identified for allocation, some of these are likely to comprise apartments.	
Lack of allocation sites south of the A45 refers to omission site at Birdingbury (1)	The strategy seeks to direct allocations to Rugby and Main Rural Settlements. Birdingbury (and other settlements south of the A45) do not fall within this category. Significant land allocations at these smaller rural settlements distant from the urban areas are not considered to represent a sustainable strategy for the local plan, but could be advanced through neighbourhood plans.	

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
Infrastructure should be built first at rural allocations to prevent isolation (1)	The strategy seeks to direct development to locations with existing infrastructure to limit relative isolation.	
Other		
No support to any allocations in green belt until evidence published (1)	Noted. A Green Belt Contribution Study will be published alongside the Regulation 19 local plan. This was not completed prior to Preferred Option due to the publication of updated Planning Practice Guidance (PPG) in February 2025 which was relevant to the methodology.	None
Brownfield sites in town centre considered potential options in HELAA not considered in housing availability (2)	Sites that we could not demonstrate to be available, suitable and achievable were not included at Preferred Option stage. However, we have continued to actively identify and assess brownfield sites in the interim, with a view to including further brownfield sites at Regulation 19. This is evidenced in the published Urban Capacity Study.	
Stagecoach car park assessed as unavailable but offered for sale (1)	This site has been considered for the Regulation 19 consultation and will be included as a site allocation.	Include Stagecoach car park (site 279)
Key brownfield sites not assessed (6)	Since the Preferred Option consultation, we have commissioned independent consultants to undertake an Urban Capacity Study. This has identified further sites, and additional brownfield/town centre sites will be included in the Regulation 19 consultation.	
Council must approach Coventry/other neighbouring authorities around unmet need before releasing Green Belt (1)	This comment is considered in the Green Belt Exceptional Circumstances Topic Paper.	
Increase in housing in the borough is unsustainable without reinstating the A&E facility at Rugby hospital (8)	This is a matter for NHS planning, and not a local plan matter.	

Policy S2 – Strategy for Homes		
Summary of issue	Officer response	Proposed change (if applicable)
Lack of train station capacity for population growth and commuter targeted housing (2)	The plan makes reference to two proposed parkway stations – Rugby Parkway and Nuneaton Parkway. Both of these stations would enhance access to the railway.	
Unfounded that dispersal strategy will support SME builders – many smaller sites in villages promoted by major developers (1)	We disagree. We do not believe that any of the proposed rural allocations are controlled by the big 6 housebuilders.	
Destruction of local green spaces will encourage greater car use (1)	We assume this comment to refers to greenfield land, and not the NPPF definition of local green space which is afforded substantial protection. As above, the strategy focuses housing allocations at Rugby town and Main Rural Settlements.	

S3 – Strategy for employment land

- 60 comments attributed to this policy

S3 – Strategy for employment land		
Summary of issue	Officer response	Proposed change
Support flexibility of uses (E(g)(ii),(iii), B2 and B8) on strategic allocations. Support for strategy for employment land and draft allocations (2)	Noted	
Inadequate small scale employment allocations (3) Sites for smaller units should be identified within the body text for either S3 or S7 (2)	The proposed new allocations are an expansion of Ansty Park which is less than 20ha in area, together with two sites of 15 to 30ha at Coton Park East and South West Rugby (both figures calculated at equalised plot ratios) and then a large strategic site at Walsgrave Hill. The allocations at Coton park East and Walsgrave Hill include requirements to deliver smaller units as part of the mix. The spatial strategy is explained in the plan itself, the Sustainability Appraisal and the stage 2 site assessment. The view of plan-makers is that the sites selected were the best option for delivering the requisite employment land and that there were not small site options that would be preferable. As both the evidence base identifies, there is no strict division between the type of units that are delivered on smaller sites versus large sites. Sometimes a single large unit is proposed on a small site, while sometimes smaller units are proposed on larger sites.	
Address employment land need from elsewhere in West Midlands (2)	Part of the evidence base for the employment strategy is the West Midlands Strategic Employment Sites Strategy (WMSESS). This considers wider strategic employment needs across the West Midlands. The proposed strategy for employment land would meet the Opportunity Area 7 strategic need identified in that study. Therefore the plan is meeting West Midlands strategic need.	

S3 – Strategy for employment land		
Summary of issue	Officer response	Proposed change
<p>Reasons for not allocating SW Rugby and Coton Park East for housing should be explained as with both sites allocated for housing there would be no need for Green Belt release for housing. Reallocating these sites for employment use is not consistent with para 147 which requires council to consider all reasonable alternatives before releasing Green Belt land (1)</p> <p>Coton Park should be allocated for housing and employment relocated to site 132 (2)</p>	<p>Both of these sites have been put forward for employment development and not residential development in the local plan call for sites in 2023-24. They are not being made available for residential development</p> <p>The reasons why these sites are not proposed for allocation for housing development are explained in the Green Belt Exceptional Circumstances Topic Paper to be published alongside the Regulation 19 consultation.</p>	
<p>Limited evidence to support agglomeration/workforce benefits of allocation on edge of Coventry (Prologis, Ryton) (1)</p>	<p>This issue is discussed in the Green Belt Exceptional Circumstance Topic Paper.</p>	
<p>Employment need has been underestimated (4)</p>	<p>The employment need has been calculated based on the evidence base. This is explained in the Development Needs Topic Paper.</p>	
<p>Major employment allocations are disproportionate to nearby settlements and lack transport access (2)</p>	<p>The Coton Park East site is located on the edge of Rugby and close to M6 Junction 1. It has excellent access to the strategic road network and also access by sustainable transport modes. The South West Rugby site is safeguarded as part of an urban extension. This site is on the M45/A45 Thurlaston Interchange and highly accessible to the SRN. This site will also have sustainable transport access as part of the South West Rugby Development.</p> <p>The Ansty Park North allocation and the proposed new allocation at Walsgrave Hill would be on the urban edge of Coventry and served by M6 J2 and the new A45 Walsgrave junction respectively. There are existing active travel links into Coventry and a new route would be delivered through the Walsgrave Hill development. In future there is potential for Very Light Rail to link these sites to central Coventry.</p>	

S3 – Strategy for employment land		
Summary of issue	Officer response	Proposed change
	<p>They have excellent access both to the SRN and by sustainable transport modes.</p> <p>Crowner Field Farm benefits from planning permission which includes an extensive transport package.</p> <p>The nearby settlements for all allocations are Rugby and Coventry. The size of the allocations is not disproportionate to the size of those settlements.</p>	
Allocations at Ansty/Prologis do not promote sustainable patterns of development (2)	<p>There are two proposed allocations at Ansty. The first, Crowner Fields Farm, already benefits from planning permission. The second, Ansty Park north, would expand the existing employment site in this area.</p> <p>Prologis Park west is not included in the proposed submission plan.</p>	
275,000sqm of office space at Crowner Fields Farm, Ansty appears at odds with the evidence base (1)	As above, Crowner Fields Farm already benefits from planning permission and this is the quantum of floorspace in that permission..	
<p>Plan should make clear whether or not the council intends to accommodate Coventry's unmet employment land needs (3)</p> <p>Is the allocation of excess employment/industrial land to meet unmet need from Coventry? (2)</p> <p>No explanation about how employment land figures have been derived in the plan. Not clear if needs met in full, or shortfall, or if provision to meet unmet Coventry industrial need. (1)</p> <p>Object to S3 as unjustified. Although allocations exceed the minimum 155ha it is not clear whether unmet need from Coventry or an appropriate share of the FEMA strategic need is accommodated. (1)</p>	<p>As explained in the Development Needs Topic Paper the proposed submission plan will accommodate all of the strategic need for opportunity area 7 as identified in the West Midlands Strategic Employment Sites Study and will contribute to meeting Coventry City Council's unmet local need.</p> <p>See more generally the explanation in the Development Needs Topic Paper for how the employment land needs are derived.</p>	

S3 – Strategy for employment land		
Summary of issue	Officer response	Proposed change
<p>If Rugby were to take all or a proportion of Coventry's unmet industrial need it would increase the residual space/land requirements (1)</p> <p>18,000sqm floorspace should be added to meet unmet need from Coventry (1)</p> <p>NBBC does not agree with Coventry City Council's approach to calculating employment land supply, but if there is agreed unmet need in Coventry, Rugby's supply would allow headroom to meet some of it. (1)</p> <p>Coventry City Council's representation states: Note that total floorspace of employment allocations exceeds the combined gross industrial need for Rugby. Would welcome further discussions regarding the possibility of helping address Coventry's identified shortfall (1)</p>		
<p>Do not agree with the approach of expressing local and regional need as a total and not separately (1)</p> <p>Considered remiss to have not distinguished between and not provided for both strategic and non-strategic employment land allocations (2)</p>	<p>This issue is addressed in the Development Needs Topic Paper.</p>	
<p>Object to proposed country park and leisure route within P2 employment site of SW Rugby (1)</p>	<p>Noted. We think the additional parkland will provide a greater buffer between development on this land and Cawston Spinney, whilst also creating opportunities for leisure routes.</p>	
<p>Should consider wider employment needs of the region (1)</p>	<p>The strategy for employment land has developed from the evidence base. The evidence base includes the West Midlands Strategic Employment Sites Strategy (WMSESS) as published alongside the Preferred Option consultation. This takes account of</p>	

S3 – Strategy for employment land		
Summary of issue	Officer response	Proposed change
	<p>the needs of the wider region, and resulted from joint working. Furthermore, we have been, and continue to work with neighbouring authorities under the Duty to Cooperate on all strategic matters.</p> <p>With regard to unmet employment need in Coventry City – see above.</p>	
<p>In providing approximate sq m floorspace, should ensure plot ratio is sufficient for gross site areas (1)</p> <p>Industrial land requirement needs to increase to take account of lower plot ratios (1)</p>	<p>Employment land requirements have been expressed in square metres to avoid the issue of differing plot ratios. Square metres of floorspace identified for allocations are considered deliverable taking into account likely net developable areas.</p>	
<p>Office space allocations do not meet identified need in the evidence base, and office use not identified as employment outside settlement boundaries (1)</p>	<p>The Development Needs Topic Paper identifies the need for office land and new evidence on office needs is published as part of the Regulation 19 consultation. Policy E2 does support offices (in common with other forms of employment development) in rural locations where they are conversions, expansions or infilling.</p>	
<p>Employment land allocations should be considered the absolute minimum for x4 reasons: suppressed demand, non-delivery, lack of flexibility re Crouner Fields Farm, and growth of e-retailing (2)</p>	<p>Land allocations are identified to meet the evidenced need. There is no clear reason why it should be treated as an “absolute minimum”. The plan will be reviewed in five years’ time and if the need for additional employment allocations comes to light at that point then there would be an opportunity to consider the need for further land allocation.</p>	
<p>No support to any allocations in green belt until evidence published (1)</p>	<p>Noted. A Green Belt Contribution Study is forthcoming and will be published alongside the Regulation 19 local plan. This was not completed prior to Preferred Option due to the publication of updated Planning Practice Guidance (PPG) in February 2025 which was relevant to the methodology. A Green Belt Exceptional Circumstances Topic Paper is also published.</p>	

S3 – Strategy for employment land		
Summary of issue	Officer response	Proposed change
Non-Green Belt sites can deliver country park like Prologis therefore this isn't an exceptional circumstance (1)	Noted. Prologis Park West is not a proposed allocation carried forward to Regulation 19 stage.	
Equal agglomeration and clustering opportunities exist at Rugby as do at Coventry east therefore this isn't an exceptional circumstance (1)	This is discussed in the Green Belt Exceptional Circumstances Topic Paper published alongside the Regulation 19 consultation.	
Employment need to be considered a minimum not a ceiling (1)	Policy S3 plans for identified needs. It would not be consistent with plan-led growth for the plan to provide for an unspecified level of further employment land beyond assessed need to come forward.	
Overall the Frasers scheme (Crownier Fields Farm, Ansty) will not increase logistics supply as it is not available to the open market (1) It is not clear if the Crownier Fields Farm, Ansty site is proposed for allocation because of the resolution to grant planning permission, or on its own merits. (1)	This issue is addressed in the Development Needs Topic Paper and Green Belt Exceptional Circumstances Topic Paper. For consistency with other large employment sites the site is proposed to be removed from the Green Belt. It is necessary to set parameters for its future development through a site allocation policy.	
Query whether more employment land should be identified. Additional land in proximity to Rugby Town Centre would be welcome for SMEs (1)	There are not sites available for employment development close to Rugby Town Centre.	
Methodology for employment site selection is unsound (1)	The methodology is set out in the Spatial Strategy and Site Selection Methodology Summary.	
No index provided to measure 'diversification' of employment (1)	The council cannot control end users of future employment land. However, it can identify locations where, based on evidence, a diversity of end users is more likely.	
Plan makes no reference to IT and Media sector (1)	The plan is for land use not specific occupiers or sectors. The council cannot control end users of employment land.	
Majority of employment growth is taking place outside of locations for employment - 5800 job increase out of total growth of 7300 from 2021 to 2041 are outside of offices, manufacturing and warehousing based on Iceni report (1)	That is correct. The plan is a land use plan, its role is to consider the land use implications of future employment land need. Other types of employment land growth may not have land use planning implications that would need to be addressed in a local plan.	

S3 – Strategy for employment land		
Summary of issue	Officer response	Proposed change
Opportunities for canal-led tourism and hospitality not considered (1)	Policy E3 (Rural economy) (Avi) specifically supports new canal-based facilities (not including permeant residential moorings. Therefore, whilst specific locations/sites are not identified, we do consider the plan to be supportive of opportunities for canal-led tourism and hospitality.	
Lack of accommodation for health workers provided (1)	Accommodation in the form of housing is addressed in the housing strategy and housing policies. The need is considered holistically, and not broken down by employment sector.	
Need for a greater number of sites for smaller units, incubator units and affordable grow on space generally and specifically in Ryton. Refers to HEDNA para 2.7, table A7.1 of WMSESS and Ryton NDP (1(SP))	See response above in relation to employment units. Smaller units are specifically required within the Coton Park East and Walsgrave Hill allocations.	
Surplus of over 200,000m2 of employment floorspace (need and allocations don't match) (1)	We acknowledge that there was some headroom in the Regulation 18 allocations. Post Preferred Option consultation, a WMSESS and HEDNA alignment paper addendum has been prepared which concludes a greater employment need. This information will be published alongside the Regulation 19 consultation. See the Development Needs Topic Paper.	
Warehousing provides few jobs due to automation – limited benefit to the population (1)	National policy requires local authorities to assess future needs for employment land including identifying appropriate locations for freight and logistics development.	
Employment land should be along side motorways (1)	A number of the employment allocation are located alongside motorways. Others would have good access to other parts of the Strategic Road Network (SRN).	

S4 – Sites for Gypsies and Travellers

- 16 comments attributed to this policy
- No comments of support

In addition to the below comments from statutory bodies, stakeholders, site promoters and other bodies, 124 representations from the local community in Barnacle have been received in response to this policy. There were also 102 comments on the proposed pitches at Site 64 and 68 comments on proposed pitches at Site 328. The summaries of these comments are included in appendix 8, with officer responses to these. These have not been summarised in the body of the report.

In addition, comments relating to proposed allocations within employment land allocations are included with comments related to that site (i.e. sites 64 and 328) – See section on policy S7.

S4 – Sites for Gypsies and Travellers		
Summary of issue	Officer response	Proposed Change
S4 text currently unclear - doesn't refer to unmet need or exporting to other areas. Also note that gypsy and traveller need in the evidence base does not align with the plan period so further provision may be needed. (1)	It is acknowledged that there was/is a shortfall in the identified need vs supply for pitches, hence we have been liaising with our Duty to Cooperate partners on this matter. While the NPPF seeks that plan-makers look ahead over a 15 year time horizon for housing and employment land needs (amongst others), Planning Policy for Traveller Sites states that local plans should only identify sites for pitches for 11-15 years ahead “where possible”.	
Strongly disagree with S4. Response to DtC letter in due course (1)	Noted. We will continue to work with NBBC and other neighbouring authorities under the Duty to Cooperate. For further information please refer to the Duty to Cooperate Statement and Statements of Common Ground	
Don't consider the inclusion of a Gypsy and Traveller Pitch on the Mountpark employment site sustainable. Concern re colocation generally (2)	We included gypsy and traveller pitch requirements on the proposed strategic employment allocations at Walsgrave Hill, as part of the overall strategy for accommodating gypsy and traveller need (see S4). The proposed location for the pitches on this site would not be adjacent to employment buildings but would benefit from the site's good transport connections to Coventry.	

S4 – Sites for Gypsies and Travellers		
Summary of issue	Officer response	Proposed Change
Unlikely that S4 is in accordance with national guidance published December 2024 given timescales (1)	The Gypsy and Traveller Accommodation Needs Assessment 2025 on which the policy is based was published in March 2025 and takes into account the changes made to Planning Policy for Traveller Sites in December 2024.	
Allocation of Gypsy and Traveller sites on Green Belt land is inappropriate (4)	The Green Belt Contribution Study and assessment of harm provide evidence on sites located within the green belt. See also the Green Belt Exceptional Circumstances Topic Paper.	
Request consideration of the setting of Rugby Free Primary with regards to Coton Park East (1)	Gypsy and Traveller pitches are no longer proposed as part of the Coton Park East allocation.	
Note shortfall in Gypsy and Traveller pitches. Hinckley and Bosworth Borough Council currently working to identify its own need. Acknowledge DTC letter from Rugby on this matter, but cannot to commit to helping meet unmet Rugby need until own need is quantified (1)	Noted. We will continue to work with Hinckley and Bosworth Borough Council under the Duty to Cooperate.	
Recommend that further steps taken to demonstrate how suggestion in GTAA has been addressed re intensification and expansion of existing gypsy and traveller sites (1)	No existing sites have been put forward for intensification except for Bryants Bungalow.	
Policy is unenforceable (part B) (1)	We disagree, this can be assessed as part of a planning application.	
G&T sites are too concentrated together and restricted to village settings (1)	It is recognised that the pitches proposed to be allocated at Top Park, Barnacle and Wilsher Ranch, Shilton would be in a location that already has a significant Gypsy/Traveller population. However, in the context of past plan-making failures and a lack of alternative options to meeting pitch need, it is better to allocate land for further pitches where opportunities arise. This will allow for managed future development and increase the council's ability to resist unauthorised development.	
Under provision of G&T accommodation leaves borough	We recognise this point, and this is the reason that we are seeking to	

S4 – Sites for Gypsies and Travellers		
Summary of issue	Officer response	Proposed Change
vulnerable to unregulated development (1)	demonstrate a supply of land for gypsy and traveller accommodation needs, contrary to the historic position of the Council not being able to demonstrate supply. We think our strategy will provide a supply until 2035, and are liaising with our Duty to Cooperate Partners in our efforts to explore supply later in the plan period.	
Recommend consideration of flood risk for gypsy and traveller allocations (1)	Please see the Flood Risk Sequential Test document.	

S5 - Countryside Protection

- 7 comments were summarised in respect of this policy.
- Two of the comments related specifically to changes/corrections to the policies map rather than the drafting of the policy itself.

S5 Countryside Protection		
Issue	Officer Response	Proposed change
Policy does not allow for new or expanded outdoor sports and recreation provision in the countryside, which is acceptable in the green belt. Relevant with reference to finding a replacement for the Land at Fenny Field, Old Laurentian Rugby Club (1)	New or expanded outdoor sports provision is preferred on a development site, as set out in policy W2. With specific reference to Land at Fenley Field, it is proposed that this allocation will be deleted at Regulation 19 stage due to the latest evidence suggesting that this site will not be available. A newly inserted allocation site has potential to offer new outdoor sports provision. New or extended outdoor sports provision in the Green Belt is supported by Policy S5 which applies national Green Belt policy.	
Consider not positively written and duplicates policy guidance in NPPF (1)	We disagree. This policy refers to settlement and green belt boundaries as amended in the production of this plan.	
S5 should be transposed onto the proposals maps to ensure that settlement envelopes encapsulate allocations One comment refers specifically to Ansty Park (2)	Settlement boundaries will generally only be amended after allocations have been built out.	
Rural allocations are outside settlement boundaries and therefore contravene S5 policy (1)	As this is plan led growth (as opposed to speculative planning applications), there is no conflict with S5. Policy S5 specifically permits development in accordance with the plan.	
Prime agricultural land to be protected in S5 (1)	Policy S5 seeks to protect the countryside in the ways set out.	
Green Belt allocated for significant development so unclear if National Green Belt Policy is adopted (1.15) (1)	In preparing a local plan, green belt boundaries may be amended where exceptional circumstances can be demonstrated. A paper setting out the exceptional	

S5 Countryside Protection		
Issue	Officer Response	Proposed change
	circumstances will be published alongside the Regulation 19 consultation.	

S6 - Residential Allocations

This section considers comments attributed to specific sites and settlements within which they are located. This addresses comments attributed under S6 (residential allocations), and/or the development annex for allocation sites.

Brinklow (Including proposed allocation sites 337 and 315)

Summary of community feedback

- Number of individual respondents which refer to Brinklow and/or proposed site allocations at Brinklow: **224**
- The following organisations also refer to Brinklow and are summarised in the community feedback: **Brinklow Parish Council, and The Revel Surgery.**

The table below sets out a summary of the most frequently made comments. A fuller summary of the comments received from individuals and local organisations can be found in appendix 9.

Issue raised	Officer response
Revel GP Surgery infrastructure cannot accommodate scale of growth	We have been and continue to liaise with the ICB about primary care provision.
Insufficient school provision locally – reception class in Brinklow. Remaining primary provision in Monks Kirby requiring travel. Secondary school pupils would be on crowded buses. Nursery also oversubscribed	Having reviewed all the feedback, we propose to allocate housing at site 337 as older persons accommodation, thus reducing the overall school place demand. The position in relation to school planning is set out in the Education Topic Paper.
Roads are already congested and unable to accommodate additional journeys	Refer to Strategic Transport Assessment model impacts. This does not support the existence of this issue.
Scale of the development is inappropriate for the village size and amenities	Having reviewed all the feedback received, and considered the evidence base, we propose to reduce the residential capacity of site 315 from 340 dwellings to 250 dwellings – a reduction of 90.
Increase in flood risk to the village	The Strategic Flood Risk Assessment level 2, considers flood risk.
Electricity substation/utilities at capacity – insufficient capacity for 400 new homes plus EV charging	National Grid Electricity Distribution responded to the Preferred Option consultation and did not identify any site specific concerns. In addition, policy CL1 (Net Zero Buildings) seeks to reduce energy requirements of new homes and buildings, and generate on site renewable energy to meet the property’s energy use.
Loss of productive farmland	The Stage 2 site assessment considered this as a constraint.
Lack of local housing need and wrong housing mix	The evidence related to housing need has been discussed in the strategy section of this

	report. Evidence is borough-wide rather than settlement specific, in accordance with national policy. Policy H1 sets out the requirements for housing mix, responding directly to the evidence base.
Large number of new residents at once can disrupt community	Development of the two site allocations would come forward in a phased way, therefore occupants would arrive over a period of time and not all at once.
Lack of emergency service provision to support scale of growth	The evolving needs in respect of the emergency services related to development in the local plan will be addressed through relevant discussions with providers and appropriate development contributions.
Support the development to revitalise community – loss of local amenities could be reversed through increasing numbers	Support noted.
Site 315 – Land south of Rugby Road	
Green Belt location with impact on landscape and rural and historic setting	Evidence relating to the green belt and exceptional circumstances will be published at Regulation 19 stage. The Stage 2 Site Assessment notes the overall landscape sensitivity of this site as low/medium, and the relationship to the conservation area. A heritage assessment has also been undertaken. In response to feedback from Historic England and the findings of the heritage assessment, we propose to reduce the capacity of this site and require the eastern part of the site to be open space.
Ecological impacts at SSSIs and wildlife sites	Medium ecological constraints are noted in the Stage 2 Site Assessment, including potential impacts on SSSIs. This is considered to be a constraint capable of mitigation through detailed proposals.
Lack of communal outdoor space – playing field with a small play area and a tennis court	We propose to reduce the residential capacity of site 315, so that an area of open space is provided on the eastern side. This will provide additional open space, as well as address heritage comments outlined elsewhere in relation to this site.
Other sites around the village are more appropriate – advocate for smaller plots within the village	Existing policy is generally supportive of development within existing settlement boundaries. Alternative site options were considered through the stage 2 site assessment.
Brinklow is relatively remote, requiring private car journeys	The strategy seeks to allocate development at Rugby and at Main Rural Settlements, of which Brinklow is one. This is due to the relative availability of existing services and

	facilities (as evidenced in the Rural Sustainability Study), to meet day to day needs.
Style of new homes will be incoherent with rest of the village and not in line with Neighbourhood Plan	Any adopted neighbourhood plan policies and or updated policies in a reviewed neighbourhood plan relating to the design of new homes and the character of the village are likely to remain relevant in decision making on planning applications.
Exit onto Heath Lane is inappropriate	WCC highways have considered this and are content that a secondary access onto Heath Lane is achievable.
Site 337 – West Farm and Home Farm	
Green Belt location and partially within historic conservation area	The response to the green belt location point is as above. We are aware of the heritage constraints of the site (as noted in the Stage 2 Site Assessment) and have sought to incorporate the advice of Historic England.
Redevelopment of the existing farm buildings could provide a smaller scale development	Agree. The development requirements seek to retain, restore and repurpose the historic agricultural buildings.
Site 337 is reasonable	Support noted.

Summary of feedback from statutory bodies, organisations, and site promoters

Brinklow village		
Issue raised	Officer response	Proposed change (if applicable)
Housing development sites at Brinklow medium/high risk. Capacity at Brinklow treatment works and low environmental constraints. However upgrades will be required (Severn Trent)	We note the requirements for upgrades. A stage 2 Water Cycle Study has been produced since the Preferred Option consultation which will evidence this matter further.	
RBC Draft Local Plan meeting agenda states that Brinklow has a primary school and is therefore suitable for development which is not the case (1)	Education capacity (in this case primary education) has been and continues to be a key consideration in the spatial strategy. We are aware that only the reception class is currently accommodated in Brinklow, and the remaining primary provision is at Monks Kirby.	

Brinklow - sites 337 and 315 - feasibility work required for education provision (WCC)	Noted. Dialogue is ongoing regarding education provision generally and implications of amendments to the plan and site allocations following the Preferred Option consultation.	
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S6 and Development Annex – site 337 West Farm and Home Farm, Brinklow		
Issue raised	Officer response	
West Farm and Home Farm - Brinklow - Welcome the 'development requirements' - specifically restoration and repurposing of historic agricultural buildings (HE)	Noted.	
West Farm and Home Farm, Brinklow - Would welcome a better-preserved part of the ridge and furrow in green space (HE)	Agree that this is desirable. We have reviewed this allocation and propose to reduce the indicated capacity, and include a development principle to preserve an area in the eastern area of the site where ridge and furrow may be preserved in green space.	Reduce capacity of allocation and include principle for retention of ridge and furrow in greenspace.
West Farm and Home Farm, Brinklow - Should also enhance the setting of the GII* Church of St John the Baptist and the conservation area (HE)	Agree to include this in the development principles	Include as a development principle
West Farm and Home Farm, Brinklow - Recommend that the views of the County Council archaeologist sought in relation to the Old Oxford Canal embankment (HE)	Warwickshire County Council have been consulted upon the Preferred Options and feedback in respect of archaeology has been received.	
West Farm and Home Farm, Brinklow - Support recommendations of the 'Heritage Assessment of local plan site allocations', and recommend that these are carried through to the development requirements (HE)	We have sought to respond to the recommendations of the Heritage Assessment within the written requirements and the associated plan in the Annex of the plan. This includes retention of existing buildings, retention of an area of open space on the eastern side of the site, and boundary hedgerows. We therefore think these points are addressed in the development requirements.	
West Farm and Home Farm, Brinklow - Suggest a full planning application (rather than an outline) is a requirement (HE)	Noted	

Impact of allocations on LWS/PLWS has not been adequately considered – site 337 included in list (Warwickshire Wildlife Trust)	We disagree. The stage 2 site assessment report acknowledges ‘medium ecological constraints’ of the site by virtue of the adjacent LWS and nearby SSSIs. It acknowledges needed design and mitigation measures.	
Agricultural Land Classification does not consider 3a which is also Best and Most Versatile – site 337 given as an example (1)	Site 337 is partly previously developed land. The area at the eastern end of the site is proposed to be retained as open space, in line with heritage comments.	
Add requirements for 1) provision and upgrade to footways alongside Rugby Road and 2) Retain and upgrade pedestrian access to Broad Street via Butchers Row (PRoW) (WCC)	Agree to add to development requirements.	Add to development requirements
Development of part of the Home Farm site could impact existing resident and farming activity. Propose to sell whole farm (SP)	Noted. This site has been put forward by the landowner for consideration through the local plan process.	

S6 and Development Annex – site 315 Land south of Rugby Road, Brinklow		
Issue raised	Officer response	Proposed change (if applicable)
Land south of Rugby Road, Brinklow - Recommend that ridge and furrow in the eastern part of the site is preserved in open space, and that this is included in the development requirements (HE)	We have reviewed this site in the context of this advice, other feedback and the evidence base. The Regulation 19 Plan will reduce the indicated capacity of this site and seek to retain the eastern part as open space as suggested.	Adjust capacity and development annex.
Add to development requirements: 1) traffic mitigation measures on Heath Lane, and provision of safe walking and cycling facilities as part of Route x08 Warwickshire LCWIP (bridleway between Brandon and Brinklow) 2) Possible contributions towards other improvements in the LCWIP (WCC)	Agree to add to the development requirements in Annex.	Add to development requirements
H6 (C) in respect of Brinklow site and development requirements bullet points 2 and 3 of development requirements for site 315 should be reconsidered H6 - prefer deletion of requirement for self-build on site 315. Development Annex: 2nd bullet - need for self and	The need for self and custom build is set in para 6.20 of the supporting text for policy H6. A proportion is not specified – the policy is flexible.	

custom build properties in Brinklow must be evidenced, and if appropriate a number specified, though preference for deletion. 3rd bullet - consider Brays Close unsuitable access. Submitted masterplans show access from Rugby Road and Heath Land (SP)		
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Summary of outcomes - Brinklow

- We reduced the overall scale of growth proposed at Brinklow, by reducing the anticipated development on site 315 from 340 dwellings to 250 dwellings. This responds to feedback regarding the scale of growth at Brinklow whilst also responding to specific feedback, such as the desirability to protect ridge and furrow on the site.
- We have identified site 337 for older persons' accommodation, which would not add to school place requirements locally and would help meet identified need for such housing.

Clifton upon Dunsmore (including sites 129, 202, and 307)

Summary of community feedback

- Number of individual respondents which refer to Clifton upon Dunsmore and/or proposed site allocations at the village: **70**
- The following organisations also refer to Clifton upon Dunsmore: **Clifton upon Dunsmore Parish Council**

A fuller summary of the comments received from individuals and local organisations can be found in appendix 9. The brief summary below highlights key recurring points.

Issue raised	Officer response
Impact on surrounding views from Clifton as a hilltop settlement	Landscape has been considered through the site selection process. A separation area policy is included in the Proposed Submission Plan. This will prevent coalescence with Rugby and preserve the hilltop setting of the settlement. Sites selected for allocation are on the plateau/hilltop rather than the valley slopes.
Very limited public transport provision despite Marrons' statement. Limited options for active travel due to lack of paths/cycle lanes	Clifton-upon Dunsmore is categorised as a Main Rural Settlement (see S1), and an assessment of local services and facilities is set out in the Rural Sustainability Study. The development requirements for each of the proposed allocations seek to incorporate and/or improve active travel opportunities,

Issue raised	Officer response
	which may be further supported by the emerging neighbourhood plan.
Roads will become more congested and dangerous	There is no evidence to support the assertion that roads will become more dangerous generally, and bespoke arrangements would be designed to access each allocation site. The Strategic Transport Assessment considers the cumulative transport impacts of the local plan across the borough, and identifies mitigation in specific localities where required.
Primary school is at capacity	The Local Education Authority (see WCC comment) has indicated that the primary school has capacity to accommodate the allocations proposed. See also the Education Topic Paper.
No local need for more housing	The evidence of housing need is addressed in the 'strategy' section of this report
Objection to any further housing in the village	Noted.
Need for sewage pumping facility due to lack of existing infrastructure	The Stage 2 Water Cycle Study will provide further evidence on this matter.
Support for current site allocations totalling 150 homes but no more	Noted. No further allocations at Clifton are being proposed for the Regulation 19 plan.
Lack of good quality internet connection	Policy I3 refers to communications infrastructure for new developments.
Lack of day-to-day amenities in the village and strain on those in town	Clifton upon Dunsmore is identified as a 'main rural settlement' (see S1). The Rural Sustainability Study examines services and facilities within the village.
Additional housing for the parish should be located at Houlton	In developing a new local plan it is necessary to consider potentially available and suitable locations to accommodate development needs. Significant development is planned at Houlton. This does not mean that development at Clifton upon Dunsmore should not be considered.
Scale of development will alter the character of the village and overwhelm infrastructure	Infrastructure including the primary school and active and public transport have been addressed in response to specific comments. Landscape and the historic environment have been considered in the site selection process, as set out in the Stage 2 Site Assessments. The design of sites would have a role to play on impacts, and we have sought to include relevant 'development requirements'.
Increase affordable housing to 40% and ensure high numbers of smaller homes and bungalows	Policy H2 outlines a requirement for 30% affordable housing, based on available evidence (including need and viability).

Issue raised	Officer response
	Policy H1 addresses housing mix, and if the Clifton-upon-Dunsmore Neighbourhood Plan is successfully made, that may include policy to influence housing mix in the village.
Water pressure issues from recent development	The Stage 2 Water Cycle Study will provide further evidence on this matter.
No consideration of the Clifton Neighbourhood Plan	The Clifton-upon-Dunsmore Neighbourhood Plan has been submitted for Examination at the time of writing. It is not yet a made (adopted document). Furthermore, it is the interaction of local and neighbourhood plans, that neighbourhood plans are in general alignment with the strategy of the local plan.
Loss of natural habitat sites and impact on wildlife	Each of the sites proposed for allocation has been assessed for ecological constraints. The outcomes are set out in the Stage 2 Site Assessments.
Loss of active and good quality agricultural land	Residential allocations proposed would be on current agricultural land, including some BMV land as noted in the Stage 2 Site assessments. This has been weighed in the balance in the site selection process.
Site 129 – Land north of Lilbourne Road	
Detracts from the village's historic character	The Stage 2 Site Assessment sets out the historic context of this site. This has been weighed in the balance in the selection process.
Lack of suitable access roads or paths	The 'development requirements' proposed for this allocation include a range of access and active travel requirements.
Site 202 – Newton Road	
Addition of children's play provision needed for site of this scale	'Provision for children's play' is included in the development requirements for this site (see annex of the plan).
Preservation of existing woodland and greenery is essential	This comment has been attributed to site 202 possibly in error, as there is no woodland on this site. As a general principle, we agree that it is desirable to retain existing green infrastructure as far as possible, and other policies in the plan will support this (e.g. EN4 and EN5).
Preferable site which could add additional affordable or accessible houses to the village	Noted.
Increase in flood risk by building on areas of high runoff	The Stage 2 Site Assessment constraints related to surface water drainage as low.
Harm to PRoW – existing PRoW is well used	This is addressed by the final 'development requirement' set out in the annex to the plan.

Issue raised	Officer response
Site 307 - North Road	
Lack of access both during construction and once built	The Stage 2 Site Assessment notes access from a track off North Road.
Additional housing is not in keeping with existing built form – at odds with existing road layout and will erode the settlement boundary	This is a small-scale allocation proposal. It is smaller than the original site proposal submitted to us, because we think this is realistic. The settlement boundary can be amended through the local plan process.

Summary of feedback from statutory bodies, organisations, and site promoters

S6 - Clifton upon Dunsmore village		
Issue raised	Officer response	Proposed change (if applicable)
Housing development sites at Clifton upon Dunsmore, Dunchurch, Newbold on Avon, Newton, and Rugby assessed as medium/high risk. Treatment likely to be at Rugby-Newbold treatment works which has capacity but high environmental constraints. However, upgrades will be required (Severn Trent)	We note the requirements for upgrades. A stage 2 Water Cycle Study has been produced since the Preferred Option consultation which will evidence this matter further.	
Housing growth at Clifton upon Dunsmore unduly restricted by primary school capacity – non green belt and sustainable location with proximity to Rugby (SP)	We think it is important that primary aged children should be able to attend school in their locality with the ability to walk to school and minimize the necessity for trips by private vehicles. This view is supported by WCC (see below) and in the Education Topic Paper.	
Clifton - Would not be able to accommodate whole allocation in existing primary school: sites 129, 202, 307. Preferred total allocation to minimise primary age children travelling further afield to school: 150 (WCC)	The total of the proposed allocations at Preferred Option was 150 dwellings, so we consider this in line with the feedback from the Local Education Authority.	
Request that existing village environment is applied to all new	The emerging Clifton Neighbourhood Plan (at Regulation	

developments – a single style of development is inappropriate given the range of properties in the village. 20mph to be maintained. (PC)	16 consultation stage at the time of writing) includes design codes for the village. We think this is the best way to address this matter.	
Sites 129, 202 and 307 not justified as an appropriate strategy with regard to reasonable alternatives. Consider site 238/335 more suitable, having regard to the SA (SP- Richborough)	See stage 2 site assessment and Sustainability Appraisal report.	

S6 and Development Annex – site 129, North of Lilbourne Road		
Issue raised	Officer response	Proposed change (if applicable)
North of Lilbourne Road, Clifton upon Dunsmore - Recommend that all 5 recommendations from the 'Heritage Assessments of local plan allocation sites' are carried through to the development requirements (HE)	Agree to integrate principles in broad form, although reworded and combined.	Amend development requirements.
Add to development requirements: 1) Provision of a pedestrian route along Lilbourne Road as well as Buckwell Lane, 2) Provision of links toward LCWIP Route 47 (park connector between Coton Park and Clifton) which connects to Rugby Station and town centre (WCC)	Agree to add to the development requirements.	Add to development requirements
Sites 334, 87, 202, 129 and 40 cumulatively have potential to impact on the A5 corridor, and HBBC reserve the right to comment further on these as the plan progresses. (HBBC)	Noted. The Strategic Transport Assessment has been produced since the Preferred Options consultation. This will be published alongside the Regulation 19 Plan and the outcomes discussed as part of the Duty to Cooperate.	
A number of the proposed allocation sites would be met with recommendations for archaeological investigations prior to the determination of a planning application (WCC)	Noted.	

S6 and Development Annex - site 202, Newton Road, Clifton upon Dunsmore		
Issue raised	Officer response	Proposed change (if applicable)
Add to development requirements: 1) Pedestrian and cycle access should be provided to Buckwell Lane via Manor Lane, 2) Provision of links toward LCWIP Route 47 (as above) A number of the proposed allocation sites would be met with recommendations for archaeological investigations prior to the determination of a planning application	Agree to add to the development requirements	Add to the development requirements in the annex
Sites 334, 87, 202, 129 and 40 cumulatively have potential to impact on the A5 corridor, and HBBC reserve the right to comment further on these as the plan progresses.	Noted. The Strategic Transport Assessment has been produced since the Preferred Options consultation. This will be published alongside the Regulation 19 Plan and the outcomes discussed as part of the Duty to Cooperate.	

S6 and Development Annex - Site 307, North Road, Clifton upon Dunsmore		
Issue raised	Officer response	Proposed change (if applicable)
Add to development requirements: Pedestrian facilities to join onto the existing network at North Road (WCC)	Agree to add to development annex	Add to requirements in the annex

Summary of outcomes – Clifton upon Dunsmore

- The allocations will be carried forward as set out within the Preferred Options, with additional development principles added as identified in the tables above.
- New area of separation policy added.

Dunchurch (including proposed allocation sites 341 and 90)

Summary of community feedback

- Number of individual respondents which refer to Dunchurch and/or proposed allocations at Dunchurch (specifically sites above): **231**

- The following organisations comments are included in the community feedback:
Dunchurch Hall Residents, Action4Dunchurch, Dunchurch Parish Council
- A further **652** letters were received from Action4Dunchurch on behalf of individuals

A fuller summary of the comments received from individuals and the organisations listed above is included in appendix 9. The brief summary below highlights key frequently recurring issues raised, followed by an officer response.

Recurring comments summary	Officer response
Scale of growth proposed is disproportionate and will lose village identity	Sites 341 and 90 will no longer be taken forward as allocations. In addition, we will include a policy defining an 'area of separation' to keep Dunchurch as a distinct place from Rugby. It is noted that responses also refer to site 73, which is an omission site (Lodge Farm). This is not a proposed allocation.
Impact of increased traffic on the villages	The Strategic Transport Assessment acknowledges constraints and congestion at Dunchurch Crossroads. Whilst we anticipate that highways mitigation associated with South West Rugby will alleviate some of the traffic issues once delivered, we recognise the community concerns regarding traffic and the associated impacts reported.
Traffic associated impacts on the Air Quality Management Area (AQMA), safety and noise	As above.
Insufficient infrastructure to accommodate scale of new residential developments	Sites 341 and 90 will not be taken forward as residential allocations. Site 73 is an omission site and is not (nor was it) proposed as an allocation.
Impact on natural landscape, habitats and potential impact on SSSIs	Sites 341(to which this comment is attributed) will not be taken forward as an allocation.
Coalescence of Dunchurch with Rugby, and potential future coalescence with Thurlaston – loss of village identity	In response to concerns regarding coalescence we propose to introduce an area of separation policy in the Regulation 19 Plan, which will include the setting out of an area of separation between Rugby and Dunchurch. This is intended to resist coalescence and support the separate identity of Dunchurch.
Increased pressure on schools	WCC (the Local Education Authority) has noted that existing schools at Dunchurch do not have the capacity for the allocation proposed. This may be alleviated when new schools at South West Rugby open, but recognise community concern. See Education Topic Paper.

Increased pressure on GP services	A new GP surgery is envisaged at South West Rugby, but pressures at the existing GP surgery are noted.
Damage to landscape and loss of habitats	Landscape and ecological constraints have been assessed as part of the site selection process. Assessments are included in the published evidence base.
A recurring comment is that Dunchurch is already absorbing impacts from South West Rugby and that Dunchurch cannot therefore accommodate further allocations.	Infrastructure planned at South West Rugby has been designed to mitigate impacts of the development, though much of it is yet to be delivered. In light of the feedback received to the consultation as a whole, and other relevant changes to the plan, it is proposed that both sites 341 and 90 are not carried forward into the Regulation 19 plan.
Allocations include BMV farmland contrary to the NPPF	Both site 341 and site 90 are classified as Grade 3 agricultural land, which is not the highest grade of agricultural land.

Summary of feedback from statutory bodies, organisations, and site promoters

Dunchurch village		
Issue raised	Officer response	Proposed change (if applicable)
Viability concerns for Primary Care expansion related to smaller sites strategy. Locations of noted concern: Wolvey, Dunchurch, Wolston (1)	Noted. We continue to liaise with the Integrated Care Boards regarding primary care.	
Housing development sites at Clifton upon Dunsmore, Dunchurch, Newbold on Avon, Newton, and Rugby assessed as medium/high risk. Treatment likely to be at Rugby-Newbold treatment works which has capacity but high environmental constraints. However, upgrades will be required (1)	Noted. Further evidence on this matter to be provided in the Stage 2 Water Cycle Study.	
Dunchurch - Would not be able to accommodate whole allocation in existing primary school: sites 341,90 (1 WCC)	Noted. Further modelling of education is being undertaken and will be presented in a topic paper.	

Existing buffer requirement needs increasing at SW Rugby/Dunchurch (1)	We are exploring and intend to include a policy including an area of separation between Rugby and Dunchurch.	
Site 122 Fenley Fields is within Dunchurch parish, not Cawston (2)	Noted. This site will be deleted at Regulation 19 stage due to the site no longer being considered deliverable.	

341 – Land south of Coventry Road		
Issue raised	Officer response	Proposed change (if applicable)
There are other proposed allocations that should contribute to the south west Rugby infrastructure package Consortium rep highlights Fenley Fields (site 122), Homestead Farm (site 90) and Coventry Rd, Dunchurch (site 341). Suggest they should contribute to off-site highway schemes that benefit them. Also argue that the safeguarded land should contribute to Appendix K highways, active travel and public transport infrastructure (2)	Noted, though this allocation is proposed for deletion.	
Propose extension to site linking to Sandford Way with ped/cycle link and emergency access (1)	Noted, though this allocation is proposed for deletion.	
Add to development requirements 1) Direct cycle access to Dunchurch Boughton CE Primary School, 2) Pedestrian and cycle links to PRow and National Cycle Route on the western edge and PRow east-west footpath through the site, 3) Pedestrian and cycle routes must link to provision along Coventry Road as part of the Homestead Link Road scheme and those being implemented to the north, 4) Other contributions may be required	Agree to add should site be retained. However, this site is subject to deletion.	
Request for traffic calming measures in Dunchurch to abate increased traffic flows (7)	Noted, though this allocation is proposed for deletion.	

Dunchurch - Would not be able to accommodate whole allocation in existing primary school: sites 341,90	Noted. Both of these sites are proposed for deletion.	
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90 – Homestead Fram, Coventry Road, Dunchurch		
Issue raised	Officer response	Proposed change (if applicable)
There are other proposed allocations that should contribute to the south west Rugby infrastructure package Consortium rep highlights Fenley Fields (site 122), Homestead Farm (site 90) and Coventry Rd, Dunchurch (site 341). Suggest they should contribute to off-site highway schemes that benefit them. Also argue that the safeguarded land should contribute to Appendix K highways, active travel and public transport infrastructure (2)	Noted, though this allocation is proposed for deletion.	
Request for traffic calming measures in Dunchurch to abate increased traffic flows (7)	Noted, though this allocation is proposed for deletion.	
Add to development principles 1) Existing PRow must be maintained on existing route and made accessible, safe and attractive - provide a route to the junior school, 2) Pedestrian and cycle routes to link to provision on Coventry Road as part of the Homestead Link scheme, and those being implemented to the north	Agree, though this site is proposed for deletion.	

Summary of outcomes - Dunchurch

- o Sites 341 and 90 will not be taken forward as allocations in the proposed Submission Plan
- o Inclusion of a new policy to demonstrate an ‘area of separation’ between Rugby and Dunchurch

Long Lawford (including proposed site 316)

Summary of community feedback

- Number of individual respondents which refer to Long Lawford and/or the proposed allocation at Long Lawford: **45**
- The following organisations comments are included in the community feedback: **Long Lawford Parish Council**

A full summary of the comments received from individuals and the organisations listed above is included in appendix 9. The brief summary below highlights key recurring issues raised, followed by an officer response.

Recurring Issue	Officer response
<p>Continuous pattern of housebuilding at Long Lawford is changing its character and reducing separation with Rugby</p>	<p>In order to meet the identified needs, the strategy seeks to allocate sites for housing at Rugby and within Main Rural Settlements. Long Lawford is a Main Rural Settlement, with proximity and good public transport links to Rugby, as set out in the Rural Sustainability Study. It is recognised that, as at Rugby, development in the second half of the twentieth century and beyond has changed the character of Long Lawford.</p>
<p>Lack of facilities within the village</p>	<p>The Rural Sustainability Study considered facilities within the village, considering essential and desirable services. The noted services at Long Lawford are set out within the study, and there is reported capacity at the primary school to accommodate the allocation site.</p> <p>The site promoter and the Integrated Care Board (ICB) have both commented on the lack of a GP surgery in the village (an area of no score in the Rural Sustainability Study) however the ICB does not consider there to be a business case for a new surgery. However, new space for community use is identified.</p> <p>Similarly, the development requirements set out that a small scale convenience store should be provided on the allocation site.</p> <p>In contrast to many other main rural settlements, facilities in Rugby are close by and reachable by public transport. The new allocation at Lawford Fields Farm would create a safe walking and cycling route to Rugby.</p>

Traffic impacts – increased population and construction traffic	The cumulative traffic impacts are considered in the Strategic Transport Assessment. The proposed allocations are located on the southern side of Coventry Road, with the noted good public transport links to Rugby. Construction management would be a matter considered at planning application stage.
Flood risk associated with proposed allocation. Site is reported to hold water in heavy rain and perceived increase in surface water flooding following the most recent housebuilding	The site has been subject to a sequential test in terms of flood risk, and the Strategic Flood Risk Assessment (Stage 2) considers each site.
Residents and the Parish Council note presence of a high-pressure gas main through the proposed allocation site	We are aware of the pipeline constraint. This will be a layout and design constraint to any development on the site. This constraint has been factored in in calculating site capacity.
Green belt exceptional circumstances not demonstrated	A Green Belt Assessment will be published alongside the Regulation 19 plan, along with a paper setting out the exceptional circumstances case.

Summary of feedback from statutory bodies, organisations, and site promoters

As there was only one site allocation included at Long Lawford in the Preferred Option consultation, comments relating to the village (and not directly attributed to another policy) and the site are considered in the same table below.

Long Lawford and site 316		
Issue raised	Officer response	Proposed change (if applicable)
Long Lawford - site 316 - Primary school would have capacity for this level of growth, but implications at secondary provision - pressure on Avon Valley (1 WCC)	Noted.	
Land at Long Lawford - Recommend that all 4 recommendations from the 'Heritage Assessments of local plan allocation sites' are carried through to the development requirements (1 HE)	We think that one of the three recommendations is already included (link to the PRoW). The plan in the annex illustrates the existing L plan working buildings. We can add a principle regarding retaining if they are found to retain heritage interest, and to consider the setting.	Amend development principles

Propose land for a doctor's surgery and pharmacy and retail (SP)	We continue to discuss this with the ICB. This links with community feedback.	
Add to development principles 1) Provision of footpaths and cycle tracks along Coventry Road, including LCWIP Route R63 (A428 Rugby Road, Long Lawford) which connects with Rugby town centre, 2) Contributions may be required (WCC)	Agree to add to development principles	Add to development principles
Impact of allocations on LWS/PLWS has not been adequately considered <ul style="list-style-type: none"> • 316 listed (WWT) 	We disagree. Appropriate assessment has been undertaken.	

Summary of outcomes – Long Lawford

- o Site 316 (Land at Long Lawford) will be taken forward to the Regulation 19 Plan
- o In addition, a new potential allocation has been identified. Further information will be provided in the updated Stage 2 Site Assessments, and in the Sustainability Appraisal.

Newbold on Avon (site 75)

Summary of community feedback

Multiple responses were received in relation to site 75, Lea Crescent. A total of **42** individual responses were received.

A summary of the most frequently made comments is included below. A fuller summary is included in appendix 9.

Issue raised	Officer response
Loss of local green space – wellbeing impacts and lack of places for children to play	Noted.
Site is regularly used by the local scout group	Noted.
Already too many infill sites in this area	Noted. This site would not form infill
Loss of bus turn	Whilst the site boundary appears to run through the existing bus turn, it would not be the intention of any allocation to impact its operation.
Land allocated for allotments (Parkfield Road) is better suited	We have assessed sites put forward to us/identified for potential allocation.
Green belt release not justified	Assessment of the green belt and the case for exceptional circumstances will be forthcoming at Regulation 19 stage.

Summary of feedback from statutory bodies, organisations, and site promoters

Site 75 – Lea Crescent		
Issue raised	Officer response	Proposed change (if applicable)
Impact of loss of green space (Site 75) on Scout Group not accounted for. (1)	This site is proposed for deletion in the Regulation 19 plan.	
Provide a link towards LCWIP Route 49 (Parkfield Road) which links to employment sites (WCC)	Agree to add if site retained, though this site is proposed for deletion in the Regulation 19 version.	

Summary of outcomes – Newbold on Avon

- o Site 75 will not be included in the proposed Submission Plan.

Newton (including site 87)

Summary of community feedback

- **27** individual responses refer to Newton and/or site 87
- **Newton and Biggin Parish Council's** response is included within the community feedback
- N.b. comments relating to site reference 59 at Newton Manor Lane are not included here. They are instead summarised separately under 'Rugby' sites, as although this site is within the parish of Newton and Biggin, it is considered to relate more to the urban edge of Rugby than the village of Newton.
- Comments relating to the proposed school allocation at St Thomas Cross are included under policy I6.
- Comments relating to site 64, a proposed employment allocation at Coton Park East, are included under S7.

A more detailed summary of all community feedback related to Newton and site 87 is included in appendix 9.

Issue raised	Officer response
Scale of growth at Newton contrary to S1 and inappropriate (observes 265 houses, secondary school, employments area and G&T site)	It is acknowledged that the allocations for growth summarised, fall within the parish which includes the village of Newton, and this is the reason for these comments. S1 however is concerned with individual settlements. Site 87 is directly related to the village of Newton, whilst the housing site at Newton Manor Road is considered to have a functional relationship with the edge of Rugby. Similarly with other uses listed.
No objection to residential development subject to conformity with Neighbourhood Plan and footpath/greenery retention	Noted. Once the Newton and Biggin Neighbourhood Plan is made, this would serve to guide decision making on any application.
PRoW must be maintained and a pedestrian crossing installed	The development requirements in the annex include retention and accessibility of the PRoW, and crossing facilities.
Site should not be accessed from The Hollies to minimise disruption to existing residents. Houses near the Hollies should be set back to match existing layouts	Noted. The access arrangements are a matter for the planning application stage. It is assumed that the reference to set back is to reflect the existing character, and is noted. This may be addressed by the emerging neighbourhood plan. The Strategic Transport Assessment assumes a new access rather than access from the Hollies.
Additional 25 houses is unnecessary when there are already so many being built in Coton Park	The proposed allocation is part of a spatial strategy to meet the evidenced housing need of the borough.
Thomas St Cross junction - Junction is in need of improvements and has not been previously funded by developers	The Strategic Transport Assessment will identify if any mitigation is required to be secured through planning applications.

Improvements to the roads in Newton needed – cumulative impact of developments	Noted. As above
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Summary of feedback from statutory bodies, organisations and site promoters

Site 87 – Hillcrest Farm		
Issue raised	Officer response	Proposed change (if applicable)
Newton - Site 87 - primary school expansion possible. Pressure at secondary (WCC)	Noted. We continue to liaise with the Local Education Authority.	
Add development requirements: Upgrade walking and cycling links (footpath to the north and bridleway to the south) to Great Central Walk/LCWIP Route 46 (Great Central Walk between Crowthornes and Newton) which connects to schools, local amenities and employment sites in Coton Park (WCC)	Agree to add to development requirements	Add to development requirements
Newton is comparable in sustainability terms to a number of the Main Rural Settlements – argues for enlarged allocation (1)	The point regarding sustainability relative to Main Rural Settlements is addressed under S1 above. We do not propose to enlarge the allocation within the village.	
Not sustainable to direct high quantum of growth to Wolvey & Newton – refers to Rural Sustainability scores (4)	In respect of Newton village, we think the allocation of site 87 is proportionate to the village. It is recognized that this comment may concern the Newton Manor Road site (site 59 – see below) and the proposed allocation of a school at Thomas St Cross, as both of these sites are within the parish. For reasons outlined elsewhere, the proposed school allocation will no longer be included at Regulation 19 stage, and the site 59 is considered to have a functional relationship with the edge of Rugby (Brownsover) rather than the village of Newton.	
Housing development sites at Clifton upon Dunsmore, Dunchurch, Newbold on Avon, Newton, and Rugby assessed as medium/high risk. Treatment likely to be at Rugby-Newbold treatment works which has	Noted. Further evidence on this topic will be provided in the Stage 2 Water Cycle Study.	

capacity but high environmental constraints. However, upgrades will be required (Severn Trent Water)		
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Summary of outcomes - Newton

- o The proposed allocation of site 87 to be carried forward to the proposed Submission Plan.
- o N.B site 59 (Newton Manor Lane) is considered later in this report due to its functional relationship to Rugby. Site 64 Coton Park is a proposed employment allocation and is addressed under comments relating to policy S7, and the proposed secondary school at St Thomas Cross is addressed under policy I6.

Rugby

A fuller summary of community comments related to sites within Rugby is included in appendix 9.

Morgan Sindall House

Community feedback included a single comment attributed to this site:

Issue raised	Officer response
Site development should improve access from New Bilton to town centre	We recognise this point generally, and have sought to include developer requirements to enhance active travel links wherever possible across all site proposals.

Statutory bodies, stakeholders, site promoters

Site 62 – Morgan Sindall House		
Issue raised	Officer response	Proposed change (if applicable)
Rugby - Sites 62 and 332 - limited education capacity (WCC)	Noted. Further education modelling is being undertaken and will be summarised in a topic paper. We continue to liaise with WCC on this matter.	
Raise concerns regarding the potential impact of redeveloping the Morgan Sindall Building – proximity to CA and listed buildings. Concerned re impact of a taller building. A Heritage Assessment should be required. Support reuse of parts of building (as per development requirements) (HE)	A heritage assessment has been prepared.	

Add to development requirements: Contributions required toward town centre Active Travel Zone, and cycle route network improvements identified as part of the LCWIP (WCC)	Agree to add to development requirements	Add to development requirements
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Former Rugby Borough Council Depot, Albert Street

No community feedback has been attributed to this site. The table below summarises responses from statutory bodies.

Site 332 – Former RBC depot		
Issue raised	Officer response	Proposed change (if applicable)
Rugby - Sites 62 and 332 - limited education capacity (WCC)	Noted. We have undertaken further modelling of school place provision, to be summarised in a topic paper. We also continue to liaise with WCC with regard to school places.	
Add to development requirements: Contributions required toward town centre Active Travel Zone, and cycle route network improvements identified as part of the LCWIP (WCC)	Agree to add to development requirements	Add to development requirements
Former Council Depot, Albert Street - recommend tallest buildings directed away from adjacent listed buildings, opposite of development requirements (68 and 70 Albert Street are listed buildings (HE)	Noted. We will delete the reference to five storeys at the eastern end of the site, and include reference to the listed buildings.	Amend development requirements

Land at Fenley Field, Old Laurentian Rugby Club, Cawston

Summary of community feedback

Issue raised	Officer response
Should be covered by the adopted SW Rugby Masterplan SPD	This site is located outside (but close to) the existing allocation of South West Rugby. It is not included in the masterplan for this reason.
Loss of local community facility	Noted. This site will not be included in the proposed Submission Plan.

Summary of feedback from statutory bodies, organisations and site promoters

Site 122 – Land at Fenley Field		
Issue raised	Officer response	Proposed change (if applicable)
Cawston - Site 122 - limited education capacity (WCC)	Noted. For reasons of deliverability, this site is not proposed to be included in the Regulation 19 plan.	
Development of the Fenley Field Old Laurentian Club should be contingent on not just finding an alternative site, but of replacement provision aligning with the recommendations of the Council's Playing Pitch and Outdoor Sport Strategy (PPOSS) (SE)	Noted. For reasons of deliverability, this site is not proposed to be included in the Regulation 19 plan.	
Add to development requirements: Layout should provide clear legible links to adjacent South West Rugby, including LCWIP Routes 37 (Scots Close Bridleway) and R39 (Cawston Lane between Cawston and Dunchurch) (WCC)	As site is not progressed into the Proposed Submission Local Plan this development requirement is not added.	
Site 122 Fenley Fields is within Dunchurch parish, not Cawston (2)	Noted. As with other sites, the use of Cawston is not connected to the parish, rather the likely functional relationship.	
Consortium rep highlights Fenley Fields (site 122), Homestead Farm (site 90) and Coventry Rd, Dunchurch (site 341). Suggest they should contribute to off-site highway schemes that benefit them. Also argue that the safeguarded land should contribute to Appendix K highways, active travel and public transport infrastructure (1)	Noted. Site 122 will not be included in the Regulation 19 consultation.	

Hillmorton

Summary of community feedback

- o Number of individual respondents which refer to Hillmorton and/or proposed site allocations at Hillmorton: **222**.
- o The following organisations also refer to Hillmorton and are included in the community feedback: **Barby and Onley Parish Council, Crick Road Residents, Kilsby Action Group**

A fuller summary of the representations is included in appendix 9. Below is a shorter summary with officer responses to the most frequently recurring issues raised:

Issue raised	Officer response
Impact on biodiversity, environment and landscape of the Rainsbrook Valley and loss of buffer to Barby – references to landscape sensitivity assessment and appeal history in the Rainsbrook Valley.	<p>Noted. There are methodological reasons why there are differences in the landscape assessments of the draft allocation sites, and previous broader landscape sensitivity studies. Notwithstanding this, we have commissioned further assessment of the landscape value of the Rainsbrook Valley, with a view to exploring a potential landscape protection policy.</p> <p>In light of this, sites 40 and 334 will not be carried forward into the Regulation 19 plan.</p>
Loss of recreational green space and views supporting community wellbeing	<p>The land in question is in private ownership and is not wholly publicly accessible. However, no longer proposed as allocations.</p>
Overstretching of local amenities in Hillmorton-Education, community facilities, and health services noted	<p>In terms of education, school capacity has been raised as an issue by the Local Education Authority (see table of feedback from statutory bodies, organisations and site promoters below).</p> <p>As above, sites 40 and 334 will not be carried forward into the Regulation 19 plan</p>
Increased congestion on key junctions and roads through Hillmorton and towards Onley and Barby	<p>The Strategic Transport Assessment provides evidence cumulative impacts of allocation sites. These sites will not be taken forward as allocations.</p>
Area has already absorbed significant growth from Houlton, lack of further need or obligations	<p>Houlton is a large urban extension which continues to be built out. However, as evidenced and set out in the draft plan, we need to seek allocations to meet need in addition for the plan period. These sites will no longer form allocations.</p>
Lack of school capacity	<p>As above school capacity has been raised as an issue by the Local Education Authority (see table of feedback from statutory bodies, organisations and site promoters below).</p>
Lack of housing for residents - Housing would be for people relocating from London or commuters, not local young people. Need for more 1-2 bed starter homes	<p>Policy H1 sets out the housing mix and the evidence base that underpins this (amended for Regulation 19, as set out in the relevant section of this document.</p>
Support for homes in Hillmorton – shortage of homes, opportunities for different types of homes, Barby Lane site considered suitable,	<p>Noted.</p>
Impact on crematorium	<p>We note these concerns. It may be possible however to minimise and mitigate impacts through careful design,</p>

Loss of agricultural land	As noted in the Stage 2 site assessment, parts of site 124 (redrawn as 334) comprise Grade 2 (very high quality) agricultural land.
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Summary of feedback from statutory bodies, organisations, and site promoters

Two site allocations were proposed at Hillmorton in the Preferred Options Consultation. The majority of respondents refer to Hillmorton and both sites (40 and 334). The table below does not therefore seek to address them separately.

Hillmorton		
Issue raised	Officer response	Proposed change (if applicable)
Hillmorton - Sites 40 & 334 - limited education capacity (WCC)	Noted. As above, it is not proposed that these site allocations be carried forward.	
Proposed mitigations in the event of allocations in Hillmorton - respondent suggests mitigations and conditions of development for sites 40 and 334 to reduce traffic impacts, maintain access to open space, protect trees and hedgerows and secure CIL from the development. Full site specific suggestions included in rep (1)	Noted, however both site allocations are proposed to be carried forward to Regulation 19.	
Kilsby Lane (40) - Consider the setting of the canal conservation area particularly important due to boundary with the canal. A connection between a canal conservation area and the Hillmorton conservation area should be considered when CAs are next reviewed. (HE)	Agree, although this site is proposed for deletion. We intend to undertake work to explore a Conservation Area around the canal (though separately from the local plan process).	
A number of the proposed allocation sites would be met with recommendations for archaeological investigations prior to the determination of a planning application <ul style="list-style-type: none"> Sites 40 and 339 referenced (WWT) 	Noted. Site 40 however is not proposed to be included in the Regulation 19 plan.	
Sites 334, 87, 202, 129 and 40 cumulatively have potential to impact on the A5 corridor, and HBBC reserve the right to comment further on these as the plan progresses. (HBBC)	Noted, and we will continue to liaise on this topic, though sites 40 and 334 are not proposed for inclusion in the Regulation 19 plan.	

Site 40 development principles: Consider these should be less prescriptive with regards connectivity and accessibility - to be considered at masterplanning/application stage. Also caution against being prescriptive re orientation of properties toward the towpath (SP)	We disagree in principle as we want all new allocations to be well connected and integrated with their context. This allocation is not proposed for inclusion in the Regulation 19 plan.	
Sites 40 and 95 will both increase the footfall on nearby canal towpaths and the developer requirements for these sites should specify that contributions will be needed to ensure they can provide active travel links all year round. (CRT)	Site 40 is to be deleted.	
No objection to spatial strategy, strategic policies nor vision and objectives. Observations about sites closest to the administrative boundaries and potential impacts on character and highway network Sites 40, 334, and 228 noted. Evidence base for mitigation to be developed. Would welcome recognition of the qualities and sensitivities of the Rainsbrook Valley within the plan, with reference to the 2017 Landscape Sensitivity Study. (West Northamptonshire Council)	Noted. Sites 40 and 334 proposed for deletion. We have commissioned further landscape work regarding the Rainsbrook Valley, and provided the appointed consultants with the Daventry Landscape Sensitivity Study to inform the work.	
Kilsby Lane site - Suggest enlarging the allocation to land to the south in same ownership currently in commercial use. Remove risk of 'bad neighbour' use. (1)	Noted, though this allocations is proposed for deletion.	

Summary of outcomes - Hillmorton

- Neither site 40 nor site 334 will be carried forward as site allocations to Regulation 19.
- N.b Land south of Crick Road (site 338) at Houlton is considered by some to relate to Hillmorton, but is addressed separately below

Newton Manor Lane, Brownsover

Summary of community feedback

- Number of representations referring to site 59 (Newton Manor Lane): **191** (N.b this includes both residential site 59 and the proposed secondary school at St Thomas Cross)

- Organisations referring to site 59 included in the community feedback: **Newton and Biggin Parish Council**

N.b. It is acknowledged that this site is within the parish of Netwon and Biggin, though its functional relationship is considered to be with the edge of Rugby rather than the village of Newton.

A fuller summary of community comments is included in appendix 9. The table below summarises the most frequently made comments.

Issue raised	Officer response
Insufficient junction or road infrastructure to handle traffic at Newton Manor Lane and other surrounding roads	The Strategic Transport Assessment will consider if mitigations are required based on the cumulative impacts of allocations.
Intrusion beyond an established urban edge from the former railway line	Acknowledged. We think this site brings benefits through proximity to Rugby
Loss of green spaces through greenfield development – opposition to use of greenfield land	Noted. We have sought to identify appropriate brownfield land as discussed elsewhere in this report. However, to meet the assessed need, allocations on greenfield land are considered necessary.
Increase in impermeable surfaces will increase flood risk	The Strategic Flood Risk Assessment (level 2) addresses the matter of flood risk. Sustainable urban drainage is also required by the policies in the plan.
Already major developments underway around Rugby	Noted. As discussed elsewhere in this report, however, additional land is required for allocation to meet the assessed need over the new plan period.
Overstretching of local amenities and infrastructure – health and water cited	The Water Cycle Studies consider matters relating to water. We continue to liaise with the Integrated Care Board regarding GP requirements, and the NHS regarding hospitals.
Loss of productive farmland	The best and most versatile farmland is a constraint identified through site assessments (Stage 2 Site Assessments) where relevant. We do not consider it possible to meet the identified development need without allocations on green field sites.
Destruction of wildlife habitats	Ecological constraints of proposed sites were assessed as part of the site selection process. The Stage 2 Site Assessment of site 59 identifies medium ecological constraints and the requirement for a sensitive layout.

Summary of feedback from statutory bodies, organisations, and site promoters

Site 59		
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Issue raised	Officer response	Potential change (if applicable)
Newton Manor Lane - Site 59 - expansion of primary provision potential. Pressure at secondary. (WCC)	Noted. We continue to liaise with the Local Education Authority.	
A number of the proposed allocation sites would be met with recommendations for archaeological investigations prior to the determination of a planning application (WCC)	Noted.	
Newton Manor site is within Clifton, Churchover and Newton Ward (1)	Noted. The reference to Brownsover in the site name is intended to reflect the likely functional relationship of the site to the edge of Rugby.	
Add to development requirements: 1) Provision of pedestrian footway and cycle track along Newton Manor Lane, 2) Provision of crossing facilities on Newton Manor Lane, 3) Pedestrian and cycle permeability through the site including links to any new secondary school at St Thomas' Cross, 4) Measures to manage speed of motor traffic on Newton Manor Lane, 5) Contributions may be required toward the cycle route network improvements identified as part of the LCWIP including R01 (Coton Park East) and R46 (Great Central Walk between Crowthorns and Newton) (WCC)	Agree to add to development requirements	Add to development requirements

Summary of outcomes – Brownsover

- No change in respect of site 59
- The secondary school site at St Thomas Cross will not be taken forward based on the latest evidence (see I6)

Land south of Crick Road, Houlton

Summary of community feedback

Some community feedback has been included within the 'Rugby sites' summary in appendix 9. Notably some support has been expressed for the development of this site from 4 respondents.

Issue Raised	Officer response
Request to include community facilities – lack of community facilities and services to	Houlton is being built out. A new district centre is planned in Houlton which will

match the size of Houlton. Suggests pub/restaurant, doctors and dentist	include a range of facilities and services, including a doctor surgery.
Site should be used for commercial opportunities, not housing	The site was previously proposed for employment development, but this has not been delivered. Given it is immediately adjoining the proposed new railway station we consider it more suitable for housing.
Site should not be used for social housing	The site is not proposed exclusively for social housing. Affordable housing requirements on major sites are set out in policy H2
Cycle access and controlled pedestrian cycle crossing required	Noted. Improved crossing facilities are included in the 'development requirements' in the annex.

Summary of feedback from statutory bodies, organisations, and site promoters

Site 338 – Land south of Crick Road		
Issue raised	Officer response	Proposed change (if applicable)
To be addressed in existing Houlton provision. However in excess of outline consent, so schools may need to expand beyond proposed size (WCC)	Noted. We continue to liaise with WCC on school place provision.	
Add development requirements: 1) Creation of pedestrian and cycle access to the new Rugby Parkway Station, 2) Improved pedestrian and cycle crossings on Crick Road, 3) Contributions may be required towards cycle network improvements identified as part of the LCWIP including R22 (A428 Crick Road between Houlton and DIRFT), R23 (Rugby Gateway Station access), and R24 (A428 Crick Road between Paddox and Houlton) (WCC)	Agree to add to development requirements	Add to development requirements
Density should be increased to deliver 375 dwellings (with 5ha assumed developable area) (1)	In calculating approximate capacities, an assumption of the developable area is applied. We do not agree therefore that it is appropriate to increase the capacity as suggested.	
Correct boundary of site 338 (SP)	Agree to correct	Correct site boundary
There should be no requirement for pedestrian access to Rugby Parkway railway station	As the site lies immediately alongside the proposed railway station and the proposal for that station is one of the reasons for its reallocation for	

The Houlton OPP secures a pedestrian/cyclist link running along the Crick Road (A428) that will provide an active travel connection to the new station. This is consistent with the Rugby Parkway station proposals which also envisage a north-south pedestrian/cyclist link across the A428 (SP)	residential development, we consider this development principle is justified.	
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Summary of outcomes – Houlton

- Take site 338 forward as an allocation to Regulation 19.

Ryton-on-Dunsmore

As a single residential site allocation (site 100) was identified at Ryton-on-Dunsmore, comments relating to the settlement and the site are considered together below. There is no further summary in appendix 9, as all comments relating to site 100 are included below.

Summary of community feedback

- Number of responses referencing the village of Ryton and/or site 100: **81 (4 of which related to site 100, the rest refer to the employment allocation)**
- Organisations included in the community feedback summary: **Ryton on Dunsmore Parish Council, Bubbenhall Parish Council**

Issue raised	Officer response
Site was previously refused and has poor access	This site is subject to a planning appeal at the time of writing. The Council's decision to refuse the proposal did not relate to the principle of development nor access, and the site is identified in the Ryton neighbourhood plan.
Request for more mid-range homes over affordable housing	Housing mix is addressed in policy H1 and affordable housing requirements are in H2.

Summary of feedback from statutory bodies, infrastructure providers and site promoters

Ryton-on-Dunsmore including site 100 – Land at High Street		
Issue raised	Officer response	Proposed change (if applicable)
Housing development sites at Ryton on Dunsmore assessed as	Noted. The Stage 2 Water Cycle Study has been produced to	

medium/high risk. Treatment likely to be at Wolston treatment works, which has capacity and low environmental constraints. However upgrades required (STW)	provide further evidence on this topic and will be published alongside the Regulation 19 consultation.	
Ryton on Dunsmore - Site 100 - capacity at primary school (WCC)	Note capacity at the primary school.	
Capacity for site 100 West of High Street, Ryton – should be increased to 37 (SP)	We note the suggested capacity, and the capacity is altered	Capacity of site altered.
Add to development requirements: 1) Provide new footway on west side of High Street to connect with existing footway and provide safe walking route to primary school, 2) Pedestrian and cycle permeability through the site, including link to Leamington Road, 3) Improve crossing point on Leamington Road, 4) Contributions may be required toward cycle network improvements identified in the LCWIP including Cy04 (A423 Oxford Road between Tollbar End and Ryton) (WCC)	Agree to add to development requirements	Add to development requirements

Summary of outcomes – Ryton-on-Dunsmore

- Site 100 to be carried forward as a residential site allocation

Stretton-on-Dunsmore

Summary of community feedback

- Number of respondents who referred to Stretton on Dunsmore and/or the sites listed above: **48**
- Organisations included in the community feedback: **Stretton-on-Dunsmore Parish Council**

A fuller summary of the representations received is included in appendix 9. Below is a short summary of the most recurring comments and officer responses.

Issue raised	Officer response
Lack of road/other infrastructure to support additional population and associated journeys	As set out in the strategy, residential allocations have been directed predominantly to Rugby and Main Rural Settlements, of which Stretton on Dunsmore is one. Main Rural Settlements have some infrastructure provision, as summarised in the Rural Sustainability Study. We note specific local concerns about access to the

	Plott Lane site proposed at Reg 18 stage given the narrowness of that road. This is one of the reasons for the deletion of the site in the Proposed Submission Local Plan.
Overstretching of foul water infrastructure	Further evidence in respect of this matter is included in the Stage 2 Water Cycle Study which informs the Regulation 19 plan.
Green Belt exceptional circumstances not met	A green belt assessment and the case for exceptional circumstances will be published at Regulation 19.
Lack of capacity at primary school and GP surgery	We note the concern regarding primary school capacity, and this is reflected in the comment from the Local Education Authority which is included in the table below. Additional modeling work has been undertaken and a topic paper on school places is to be published. We continue to liaise with the Integrated Care Board (ICB) regarding GP services.
Impact on visual character and setting of the village - site	This comment refers to each of the site allocation proposals in the village. Landscape was a consideration in the site selection and commentary is included in the Stage 2 Site Assessment.
Potential increase in flood risk	Flood risk is addressed in the Stage 2 SFRA.
No understanding yet of the impacts of 83 properties yet to be built – 55 at Squires Road, and 28 at the Old Orchard	Land north of Squires Road has been granted planning permission, and the Old Orchard will remain within settlement boundaries and so can be developed in future.
Very limited public transport and no walking/cycling routes	The Rural Sustainability Study considers public transport. Site requirements seek to include appropriate walking and cycling routes to maximise connection opportunities.
Support for site 120	Noted.
Impact on natural habitats – site 134	The Stage 2 Site assessment considers ecological constraints. However, further to consideration of all feedback, it is proposed that this site will not be taken forward to Regulation 19 stage.

Summary of feedback from statutory bodies, organisations and site promoters

There were 3 site allocations included in the Preferred Options consultation. As such, these are considered separately below, with general settlement level comments addressed first.

Stretton-on-Dunsmore Village		
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Issue raised	Officer response	
With the exception of site 6, housing sites at Stretton upon Dunsmore assessed as medium risk. Treatment likely to be at Wolston treatment works (STW)	Noted. Further evidence to be provided in the Stage 2 Water Cycle Study.	
Stretton on Dunsmore - Sites 6, 81, 134 - primary school capacity limited. Recommend reducing overall allocation. (WCC)	Noted. We have undertaken further modelling of school place provision across the borough which will be summarised in a topic paper. We also continue to liaise with WCC on this matter.	

Site 6 – Land east of Fosse Way opposite Knob Hill		
Issue raised	Officer response	Proposed change (if applicable)
Housing sites 6 (Stretton) and 39 (Wolston) assessed as low risk due to their size. Treatment for both likely to be at Wolston Treatment Works (Severn Trent Water)	Noted. The stage 2 Water Cycle Study will be published alongside the Regulation 19 consultation which provides further information and evidence on this topic.	
Site 6 at Stretton upon Dunsmore seems at odds with other sites identified and could come under the remit of windfall due to its size. (Hinckley and Bosworth Borough Council)	This site is included as an allocation as it is located within the green belt, and is therefore unlikely to come forward as windfall development. We think it has potential to continue the frontage to Fosse Way.	
Not necessary to release site 6 (Stretton) for 3 dwellings (2 SPs)	As above.	

Site 81 – Land West of Fosse Way		
Issue raised	Officer response	Proposed change (if applicable)
Important earthwork remains of local and possibly regional importance survive across the whole of the allocation Site. Any proposal for development across this site will result in the loss of this heritage asset. It is recommended on heritage grounds that Land west of Fosse Way, Stretton-on-Dunsmore (Site ID 81) is not included on the final list of allocated sites. (WCC)	We provided this representation to the site promoter. In response the site promoter has undertaken geophysical survey work to explore whether there may be anything underground. The results of the survey have been provided to the county archaeologist for review in response to this comment.	

Land west of Fosse Way - recommend that any archaeology identified and preserved in line with national policy (HE)	As above, there is ongoing exploration of potential archaeology. Any identified would be subject to national policy.	
This site forms part of a network of small/intimate scale fields on the fringe of the settlement. This contributes to the irregular settlement outline and helps to tie the settlement into the wider farmed landscape. This is an important feature of the historic Dunsmore landscape character and should therefore, be conserved. (WCC)	The initial landscape assessment of this site (see Landscape Sensitivity Assessments of Smaller sites (p119 onward) assessed this site to have medium/low landscape sensitivity. These officer assessment has been validated by independent consultants.	
Requirement for POS on site should take account of need to deliver BNG, also query the requirement for frontage to Fosse Way. (SP)	BNG is a requirement of all planning proposals. We do not think it would be appropriate to have backs of properties toward Fosse Way, hence the principle of providing frontage.	
Add to development requirements: 1) at southern end of the site, create a direct pedestrian and cycle access onto Brookside, 2) Provide new footways and pedestrian crossing point on Fosse Way between the site access and playground, recreation and PRow on easy side of Fosse Way. (WCC)	Agree to add to development requirements	Add to development requirements

Site 134 – Land north of Plott Lane		
Issue raised	Officer response	
Provision of play area across the road from existing play area suggests lack of due consideration for sites (2)	We are pleased to revisit development principles where information suggests this is necessary, though we are confident in the site selection process. This allocation is proposed for deletion in the Regulation 19 plan.	
Add to development requirements: 1) Provide new footways and pedestrian crossing point on Plott Lane between site access and existing footways and recreation	Agree would add to development requirements, though this site allocation is not proposed to be carried into the Regulation 19 plan.	

ground on the south side of Plott Lane, 2) Contributions may be required towards improved links to school, 3) Measures to mitigate and manage motor traffic on Plott Lane to the west, and Freeboard Lane (WCC)		
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Summary of outcomes – Stretton-on-Dunsmore

- Sites 6 and 81 to be carried forward as a residential site allocation
- Site 134 deleted with new allocation instead at The Croft accessed from School Lane.

Wolston

- Comments received from **Wolston Parish Council** and **2 further individuals**

The comments below comprise all feedback attributed to Wolston.

Summary of community feedback

Issue raised	Officer response
Request to safeguard the site for extension to Wolston Cemetery	Noted, and links to comment from the Burial Committee in the table below. We have removed a section of the site from the boundary so that it is capable of being a cemetery extension.
Safe vehicle access would not be achievable	The Local Highway Authority reviewed the allocation site, and raised no concern that access would not be achievable.
Constraints at local primary school	Constraints at the local primary school are acknowledged (see also education topic paper). This has been a limiting factor in allocating residential growth at Wolston.
Loss of good farmland	Site 39 is not noted in the Stage 2 Site Assessment as being 'best and most versatile' (BMV) farmland. Greenfield allocations are considered necessary to meet identified development needs.

Summary of feedback from statutory bodies, infrastructure providers and site promoters

A single residential site allocation was proposed at Preferred Options stage. As such, comments relating to the village and this site are considered together in the table below.

Wolston including site 39 – Dyers Lane		
Issue raised	Officer response	Proposed change (if applicable)

Viability concerns for Primary Care expansion related to smaller sites strategy. Locations of noted concern: Wolvey, Dunchurch, Wolston. Wolston – limited expansion opportunities (ICB)	Noted. We continue to liaise with the Integrated Care Board regarding primary care provision.	
Restricting growth at Wolston is a wasted opportunity (SP)	Limited housing growth at Wolston was identified in the Preferred Option consultation. Primary school capacity is a significant constraint to additional housing growth in this location (see WCC comment below). However, we are proposing an additional allocation at Wolston in the Regulation 19 consultation for older person accommodation.	
Wolston - Site 39 - capacity issues at primary school. Cannot take additional pupils and no potential to expand. (WCC)	Noted. An additional allocation is proposed at Wolston for the Regulation 19 version, though this is proposed for older persons' accommodation.	
Housing sites 6 (Stretton) and 39 (Wolston) assessed as low risk due to their size. Treatment for both likely to be at Wolston Treatment Works (STW)	Noted. Further evidence on this topic is anticipated in the Stage 2 Water Cycle Study.	
Site 39 - landscape implications This parcel of land should be read in context with its surroundings in terms of landscape character. It forms part of a fringe of smaller scale, pastoral fields around the edge of the settlement. The setting is closely associated within village settlements within and around the edge of the open Dunsmore plateau landscape and is important in forming a transition between the settlement and the larger scale farmed landscape beyond. (WCC)	This site is included in the Landscape Sensitivity Assessments of Smaller Sites (2025) from p63) and see the validation of small site landscape assessments produced by consultants.	
Add development requirement: Pedestrian facilities to join onto existing footway network at Dyers Lane/School Street (WCC)	Agree to add development requirement	Add development requirement
Portion of land to be safeguarded for expansion of the adjacent cemetery (Burial committee)	Agree to safeguard some land for expansion of the adjacent cemetery – we will amend the site boundary to reflect this.	Amend site plan

Summary of outcomes - Wolston

- Part of site 39 has been removed to leave it capable of expanding the adjacent cemetery as requested in the representations received.
- As a result of other changes discussed in this report and within the evidence base, a new site allocation is proposed in Wolston for Regulation 19 stage. This is proposed to be allocated for over 55's housing in recognition of the primary school capacity constraints.

Wolvey

Summary of community feedback

- Comments received from **308** individuals
- Local organisations whose comments are included in community feedback summary: **Burton Hastings Village Meeting, Withybrook Parish Council, Stretton under Fosse Parish Council and Wolvey Parish Council**

A fuller summary of the representations received is included in appendix 9. Below is a short summary of the most recurring comments and officer responses.

Issue raised	Officer response
Major loss of Green Belt land	Assessment of the green belt and an exceptional circumstances topic paper will be published at Regulation 19 stage.
Disproportionate levels of growth which are unsustainable and over the limits of local infrastructure	We recognise public feedback regarding the scale of growth at Wolvey, which would be very significant. In combination with other changes identified in this report, we will reduce the residential allocations at Wolvey for the Regulation 19 version of the plan.
Lack of dialogue with relevant stakeholders – reference to parish council and neighbourhood planning group	As noted elsewhere in this report, there was not dialogue prior to the commencement of the Preferred Options consultation, however parish councils were invited to a briefing soon after launch. The relationship of local and neighbourhood plans is also addressed elsewhere in this report.
Loss of village identity and heritage	As above, we are reducing the residential allocations at Wolvey, and associated impacts.
Traffic issues – local nature of roads, congestion at junctions. Road safety and pollution	The stage 2 site assessments provide some commentary on the transport assessments undertaken. The development requirements and other policies in the plan seek to maximise opportunities for active travel, and mitigate any highways impacts. See also the Strategic Transport Assessment.

Issue raised	Officer response
Small-format supermarket is purely aspirational and may be unwarranted	The proposal of a new small supermarket was considered commensurate with the scale of growth proposed at Preferred Option. However, given that we are proposing to reduce the scale of residential allocations for Regulation 19 stage, we will delete this from the requirements.
Site 84 - Riverside walk and nature park do not offset landscape impacts & entrance is unsuitable	We note this concern, and other feedback in relation to this site specifically (see table below). We do not propose to carry this site forward to the proposed Submission Plan.
Flood risk in proposed areas increased – removal of natural boundaries and specific reference to perceived impact of Kingmakers development	The Strategic Flood Risk Assessments (1&2) and sequential tests have been undertaken in respect of flood risk. Notwithstanding this, in reducing the scale of allocations at Wolvey, we do not propose to take site 84 forward to the proposed Submission Plan.
Impact on local wildlife & biodiversity	Ecological constraints have been considered in the site selection process, and policies seek to minimize and mitigate impacts as far as possible.
Water, sewage, drainage and water treatment facilities are over capacity	The Stage 2 Water Cycle Study will set out further evidence on this matter. The reduction in scale of residential allocations will also reduce any impact.
GP & dentist services are under strain	We continue to liaise with the Integrated Care Board in respect of primary care.
Lack of energy capacity – refers to EV charging, heat pumps and general increased demand	We continue to liaise with energy providers in the development of the local plan.
Lack of high-speed internet connection	Noted. Policy I3 (C) requires that major residential proposals include full fibre broadband connections, unless demonstrably not possible.
Limited public transport and no active travel potential	Public transport provision is noted within the Rural Sustainability Study, and is scored relatively low for Wolvey. It is also noted in the Stage 2 site assessments for sites in Wolvey. Active travel opportunities within Wolvey are included in the development requirements, albeit that changes to allocations will alter this for Regulation 19.
Loss of agricultural land -food production and loss of agricultural jobs	Through reducing the residential allocations at Wolvey, there would be less loss of agricultural land.
Impact on local recreational sites – Mankins Fisheries cited as an example	The overall quantum of development is proposed to be significantly reduced at

Issue raised	Officer response
	Wolvey. The extent of any impacts is therefore also likely to be reduced.
Loss of green space/public bridleways/dog/walking routes/footpaths Precedent for future developments	The development requirements for all allocations seek to incorporate and protect existing active travel routes.
Proposed new community centre not wanted or needed	Noted. As above, with the reduction in residential allocations we can remove this requirement from the plan.
Lack of demand for properties in Wolvey	The local plan sets out a strategy to meet the housing needs of the borough.
Wolvey has already had it's share of development	As above, the strategy seeks to identify residential allocations for the borough as a whole, and takes multiple factors and pieces of evidence into account when identifying allocation sites. This is a frequently raised comment of community feedback in multiple settlements.
Scale of development proposed contradicts S1 of the Preferred Options Document	See comments under S1 which address this comment.
Car needed to live in Wolvey	The non-car options for travel are acknowledged to be weak (see Stage 2 Site Assessments and Rural Sustainability Study). This is part of the rationale for reducing the scale of residential allocations at Wolvey.
Parish/Neighbourhood plan disregarded	Whilst we recognise the importance of neighbourhood plans, it is the design of the plan-making system that they should align with the strategic policies of the local plan. When the local plan is updated, it is possible therefore that neighbourhood plans may need to be reviewed. This is the case across the borough.
Visual outlook & landscape character impacted	Landscape assessment has formed part of the site selection process. Notwithstanding this, reducing the scale of residential allocations at Wolvey will reduce the impacts on the village overall.

Summary of feedback from statutory bodies, infrastructure providers and site promoters

Wolvey		
Issue raised	Officer response	Proposed change (if applicable)

Finham Treatment Works does not have capacity for Wolvey development (1)	Comment noted. Please see comments from Severn Trent Water below and officer responses.	
Plan conflicts with Wolvey Neighbourhood Plan (2)	Neighbourhood plans should be in general conformity with the strategy of a local plan, and it may be the case that neighbourhood plans need to be updated following the adoption of a new local plan.	
Lack of clarity in decision making of proposal. Much of the land has previously been assessed as unsuitable (3)	The site assessment and selection process is set out in the evidence base, including most notably the Stage 2 Site Assessments. In making a new plan, we assess the land and sites based on the latest evidence.	
Lack of understanding of benefits & disadvantages of preferred option to existing or new residents (1)	The local plan is seeking to meet the identified development needs of the borough. The evidence base sets out how sites have been selected and how policies are intending to shape the development for the benefit of the local community.	
Proposed development contravenes 5 purposes of the Green Belt (1)	Evidence relating to the green belt and the exceptional circumstance case for its release through the plan will be published alongside the Regulation 19 consultation.	
More of the proposed housing should be in Rugby town where transport links already exist & cars aren't needed. There should also be more apartment blocks/housing with shared recreational areas – Wolvey sites referenced.	This is a comment related to the overall strategy of the local plan, and is responded to under S2 above.	
Wolvey Preferred Option Sites 84, 96, 309 - additional form entry required, and options need to be considered. (WCC)	Noted. We have undertaken additional school place modelling to be summarised in a topic paper, and we continue to liaise with WCC on school place provision. It is noted that the Regulation 19 plan overall however, is likely to include reduced residential allocations which may alleviate this issue.	

Need to assess cumulative impact of development sites in Wolvey (Hinckley and Bosworth Borough Council)	Agreed. We have continued to assess the sites through the emerging evidence base. On the basis of feedback received and the evidence base, it is proposed that residential allocations will be reduced in the Regulation 19 plan.	
Unreasonable for Wolvey-based development to contribute to the new St Thomas Cross 6FE secondary school (1)	Based on the latest evidence, it is no longer proposed to identify a new secondary school at St Thomas Cross (see I6).	
"Wolvey village expansion design code" document not available during consultation (WPC)	It was envisaged that a new design code for Wolvey would play a role in guiding the large quantum of residential development envisaged at the village. Such a document would be produced at a future point with input from the community as set out in the National Model Design Code. However, with a proposed reduction in the scale of residential growth at Wolvey, it is less clear whether this would bring the same benefits	Delete references to the Wolvey Village Expansion Design Code in the development requirements.
Not sustainable to direct high quantum of growth to Wolvey & Newton – reference to Rural Sustainability Study (4)	Based on feedback to the Preferred Option consultation and the latest evidence, we propose to reduce the amount of residential allocations at Wolvey.	See summary below
Viability concerns for Primary Care expansion related to smaller sites strategy. Locations of noted concern: Wolvey, Dunchurch, Wolston (ICB)	Noted. This information has been taken into account in changes proposed for Regulation 19. This includes a reduction in housing allocations at Wolvey.	

Site 84 – Land south of Leicester Road		
Issue raised	Officer response	Proposed change (if applicable)
Long-term maintenance and connectivity of proposed open space at Site 84 has not been adequately considered. (Wolvey Wetland Trust)	Noted. In response to feedback on this site and Wolvey more generally, plus other changes made to the plan for Regulation 19, it is proposed that this site	Delete site 84

Site 84 – Land south of Leicester Road		
Issue raised	Officer response	Proposed change (if applicable)
	allocation will not be included in the Publication plan.	
A number of the proposed allocation sites would be met with recommendations for archaeological investigations prior to the determination of a planning application – site 84 amongst them (WCC)	Noted.	
Housing development sites at Wolvey assessed as either medium risk (site 84) or medium/high risk (sites 96 and 309). Treatment likely to be at Wolston (STW)	Noted. Further evidence to be provided in the Stage 2 Water Cycle Study.	
Impact of allocations on LWS/PLWS has not been adequately considered – site 84 amongst them (WWT)	We disagree. An appropriate assessment has been undertaken.	
Add to development requirements: Improved pedestrian and cycle links to the village and primary school (WCC)	Agree to add to development requirements, if site is retained, though it is not proposed that this site will be included in the Regulation 19 plan	
Vehicular access to riverside walk in Wolvey should be via Outfield Way, not Wolds Lane (1)	The first development requirement in the Annex refers to vehicular access to dwellings via Outfield Way, with point 4 referring to pedestrian access to the village centre via Wolds Lane.	
Land south of Leicester Road - Wolvey - Recommend a Heritage Impact Assessment is undertaken prior to allocation (HE)	Noted, though it is not currently proposed that this site will be included in the Regulation 19 plan. A heritage impact assessment was undertaken.	
Proposed changes to development requirements for site 84 – Policy shouldn't specify access arrangements, should be flexible about this. Argue that the size of the riverside walk and nature park shouldn't be specified. Argue that the location of the children's play area and community orchard shouldn't be specified. It shouldn't say the development must comply with the design code as this	We disagree generally with suggestions to not specify development requirements. We think it is important to set out expectations for allocations, and this is consistent across the draft allocations.	

Site 84 – Land south of Leicester Road		
Issue raised	Officer response	Proposed change (if applicable)
elevates the design code to development plan status, instead it should say the design code is a material consideration. Suggest reference to public transport improvements is unnecessary given Policy I4 (SP)		

Site 96 – Land at Coventry Road		
Issue raised	Officer response	Proposed change (if applicable)
A number of the proposed allocation sites would be met with recommendations for archaeological investigations prior to the determination of a planning application – site 96 included (WCC)	Noted.	
Housing development sites at Wolvey assessed as either medium risk (site 84) or medium/high risk (sites 96 and 309). Treatment likely to be at Wolston (STW)	Noted. Further evidence on this topic will be provided by the Stage 2 Water cycle Study.	
Site is adjacent to playing fields, and development requirements should ensure integration with the playing fields in line with NPPF para 200. Expansion and enhancement of the playing fields should be considered to meet needs arising. (SE)	The development requirements note opportunity to expand the recreation ground.	
Site 96 is not currently listed as a local wildlife site but should be – notes surveyed bat activity (1)	Local Wildlife Sites are identified outside of the planning process.	

Site 309 – Land north of B4109		
Issue raised	Officer response	Proposed change (if applicable)
A number of the proposed allocation sites would be met with recommendations for archaeological investigations prior to the determination of a planning application -site 309 amongst them (WCC)	Noted.	
Housing development sites at Wolvey assessed as either medium risk (site 84) or medium/high risk (sites 96 and 309). Treatment likely to be at Wolston (STW)	Noted. Further evidence on this matter will be provided in the Stage 2 Water Cycle Study.	
Site 309 can accommodate more housing than indicated – assert 190 feasible (SP)	We note this submission from the site promoter, but also the constraints of this site and locality, and the strength of local opinion. The allocation number is indicative and not a cap, but we do not propose to amend this for Regulation 19.	

Summary of outcomes – Wolvey

- Site 84 will not be taken forward
- Site 96 will not be taken forward. Instead, a smaller allocation will be included immediately south of Fernhill Way for circa 60 dwellings (site 358)
- Allocations for a total of **210** homes will therefore be included in the Regulation 19 plan (rather than 710 in the Preferred Options version) – a reduction of 500 dwellings.

S7 – Employment allocations

Comments have been grouped by allocation site as proposed in the Regulation 18 Preferred Option consultation.

General comments

Issue raised	Officer response
Lighting restrictions for new warehousing (1)	This would be considered on a case-by-case basis in determining planning applications. It may be covered by planning condition where appropriate.
Employment site developers should make regular payments for road maintenance (1)	This is beyond the scope of the local plan.

Site 64 – Coton Park East

Summary of community feedback

- In total **140** individual representations refer to this site in the community feedback
- **Newton and Biggin Parish Council's** comments are summarised as part of the community feedback.

A fuller summary of all comments attributed to site 64 is included in appendix 10.

Issue raised	Officer response
Increase in HGV and other traffic is a hazard	The Strategic Transport Assessment models cumulative impacts and identifies mitigation where needed. It is important to note that the likely volume of traffic would be less overall and less concentrated at peak times than the residential permission which has planning permission.
Loss of habitats from around a built-up area	Site 64 is allocated in the adopted local plan for residential development. The principle of development on this land has therefore been established, though it is now proposed for employment development.
Lack of employment need locally	Employment need is addressed in the strategy section of the report. The evidence base sets out the case of employment need
Previous residential allocation is more suitable than employment and avoids green belt development	The reasons why these sites are not proposed for allocation for housing development are explained in the Green Belt Exceptional Circumstances Topic Paper to be published alongside the Regulation 19 consultation.

Issue raised	Officer response
Proposals do not make provision for protecting and strengthening Green Infrastructure close to site	The development requirements in the annex refer to existing PRoWs. This matter would be further considered at planning application stage.
Gypsy and Traveller site is inappropriate amid employment land / close to Newton residential area	A gypsy and traveller allocation will not be included in this location.
Negative impacts on nearby primary school – health and safety and setting impacts noted	The primary school is located adjacent to existing employment buildings in this area. The detailed layout and design of any planning proposal will need to be carefully considered and respond to the ‘development requirements’ in the annex.
Increased flood risk in the area	Assessment of flood risk is addressed in the evidence base – see Strategic Flood Risk Assessment level 2.
Support for expansion of primary school	Noted.
Employment site should be moved north towards Magna Park	Sites put forward through the Call for Sites near Magna Park have been assessed as part of the plan-making process. Strategic site 325 was assessed as a site option but is not proposed for allocation (see Sustainability Appraisal).
Erosion of residential character of Brownsover and Coton Park	The relationship between existing residential properties and this site will be a matter of detailed design. The site does not have a residential character at present and lies adjacent to and is accessed through existing employment land.
Lack of engagement with Rugby Free Primary School – not consulted on land for expansion	As noted in the table above, discussion have taken place with Rugby Free Primary School, and provision of additional land for the school agreed.
Previous school proposal should not be replaced with Gypsy and Traveller accommodation	The adopted local plan identified a time limited until June 2021 proposal for a secondary school to be located on this site (co-located with allocated residential development). This option has expired. The allocation is for employment land, and the gypsy and traveller allocation has been deleted.

Summary of feedback from statutory bodies, neighbouring authorities and site promoters

64 – Coton Park East		
Issue raised	Officer response	Proposed change (if applicable)
Coton Park east: 1.2 ha land for education on allocation is excessive (SP)	Discussions have been held with Rugby Free Primary and the site promoters, a revised area has been agreed.	Amend area for education
Coton Park East: Support provision of smaller units but feel as written lacks flexibility for delivery - suggest amended to "provision of 4000sqm of space in smaller units of up to 2750sqm for small and medium sized businesses" (SP)	We disagree, it is necessary within the policy to ensure smaller units are delivered because this is the basis on which allocation can support the identified need in the evidence base to deliver units of a range of sizes. This can only be done through prescription not "flexibility".	
Coton Park East: consider bullets 3&4 are deliverable. Oppose limitation on diversion of PRow in bullet 5 (SP)	Bullet 5 does not preclude a potential diversion of the PRow but states a preference for it to be retained on its current alignment – diversions only happening where this is not practicable.	
Add to development requirements: 1) Pedestrian and cycle permeability through the site, 2) Access improvements onto Great Central Walk, 3) Contributions may be required towards cycle route network improvements identified as part of the LCWIP including R45 (footpath underpass east of M6 Junction 1) and R46 (Great Central Walk between Crowthorns and Newton) (WCC)	Agree to add to development requirements in annex	Add to development requirements
Coton Park should be allocated for housing and employment relocated to site 132 (x2 Parish Councils)	The reasons why these sites are not proposed for allocation for housing development are explained in the Green Belt Exceptional Circumstances Topic Paper to be published alongside the Regulation 19 consultation.	

64 – Coton Park East		
Issue raised	Officer response	Proposed change (if applicable)
Consider potential to revert to residential use, as lack of appetite from the landowner does not mean it is undeliverable (SP)	We disagree, the site has been allocated for development for more than 6 years and has had planning permission for more than two. The site is not being made available for residential development	
Coton Park East site not achievable to deliver quantum of employment land proposed/floorspace deliverable has been overestimated. (SP)	We have had dialogue with the site promoter, and indicative site plans have been provided to indicate that the delivery of employment floorspace is deliverable.	
Coton Park and SW Rugby employment sites both assessed as medium/high risk. Treatment likely to be at Rugby-Newbold (Severn Trent Water)	Noted. To be considered in further detail through the Stage 2 Water Cycle Study.	

Site 17 – South West Rugby employment land, phase 2

Summary of community feedback

- **129** individual representations refer to this site
- Community feedback summary includes the comments of **Dunchurch Parish Council and Thurlaston Parish Council**

A fuller summary of comments is included in appendix 10.

Issue raised	Officer response
Reallocation of portion of surplus employment land such as site 17/safeguarded land in SW Rugby could provide significant housing requirement	See response above.
24/7 light pollution is harmful to wildlife	This is a detailed matter that is assessed based on a lighting report at the planning application stage.
Site is adjacent to Cawston Spinney – potential damage and harm to flora and fauna and protected species.	The plan in the annex sets out green spaces which would act as a buffer to Cawston Spinney, and this is also reflected in the South West Rugby Design Code SPD. In the Proposed Submission Plan this buffer is increased.

Issue raised	Officer response
Lack of transport access and road congestion – no evidence impacts mitigated	The Strategic Transport Assessment considers the cumulative impacts on road traffic of the local plan proposals, and sets out mitigation where necessary. In respect of South West Rugby specifically, there is an existing suite of highway infrastructure required by existing adopted policy, including the Potsford Dam link.
Land is not safeguarded for the development proposed	The safeguarded land is safeguarded for development, though it is not explicit what type of development – residential or employment
Ambiguity of funding for a link road at Potsford Dam – refers to the conclusion in the Sustainability Appraisal regarding case for employment development funding and delivering the Potsford Dam Link.	The Potsford Dam link is included in Appendix K of the South West Rugby Masterplan SPD. This sets the mechanism for funding the strategic infrastructure within the South West Rugby site, to which new development of site 17 would need to contribute.
Safeguarded employment land (site 17) should be retained as natural habitat land	This land is safeguarded for development in the local plan.
Operational hours of warehouses should be limited and mitigation strategies enforcement for light and noise	Such matters are for the planning application stage.

Summary of feedback from statutory bodies, infrastructure providers and site promoters

17 – South West Rugby employment phase 2		
Issue raised	Officer response	Proposed change (if applicable)
Proposed allocation of country park adjacent safeguarded land reduces housing deliverable on the wider site, challenging the viability as fewer homes to contribute (SP)	The inclusion of parkland adjacent to Cawston Spinney is intended to mitigate the impacts of employment development on the spinney, whilst also limiting potential conflicts which could arise from employment being adjacent to housing. Although housing was shown in this area on previous illustrative masterplans it may well be undesirable for this area to be developed for housing to	

17 – South West Rugby employment phase 2		
Issue raised	Officer response	Proposed change (if applicable)
	avoid adverse impact on the adjacent ancient woodland.	
<p>Impact of allocations on LWS/PLWS has not been adequately considered</p> <ul style="list-style-type: none"> Site 17 referenced 	<p>This site was safeguarded for development in the existing local plan. Two SPDs are adopted with reference to the existing allocation which demonstrate consideration of natural features, including reference to Cawston Spinney. We do not agree that this Local Wildlife Sites have not been adequately considered.</p>	
<p>Tritax Big Box are not opposed in principle to housing developments on land they own Rep 3315 -</p>	<p>This is true, but they have not made this land available for housing development nor promoted it for such. The reasoning for the allocation of the land for employment development is explained in the Green Belt Exceptional Circumstances Topic Paper to be published alongside the Regulation 19 consultation.</p>	
<p>Add to development requirements: 1) Pedestrian and cycle permeability through the site, 2) Contributions required towards cycle route network improvements identified in appendix K (WCC)</p>	<p>Agree to add to development requirements in annex</p>	<p>Add to development requirements</p>
<p>Reallocation of portion of surplus employment land such as site 17/safeguarded land in SW Rugby could provide significant housing requirement (38)</p>	<p>Site 17 has been promoted for employment land and not housing. Whilst as safeguarded land, the use was unspecified, we think there are benefits to overall delivery in allocating this land for employment.</p> <p>This land is not ‘surplus’ employment land, as detailed in the Development Needs Topic Paper. It is needed to meet</p>	

17 – South West Rugby employment phase 2		
Issue raised	Officer response	Proposed change (if applicable)
	assessed employment land needs.	
Safeguarded employment land (site 17) should be retained as natural habitat land (7)	This land was safeguarded for future development in the adopted local plan (2011-2031). Open space, including natural and semi natural spaces are incorporated in the masterplan and required as part of the adopted design code for the existing allocation.	
Policy overly prescriptive, should provide more flexibility (SP)	We are seeking to include development principles to guide the type of development expected. This is necessary to achieve council objectives for the development of employment land.	
Opportunity to provide playing fields as part of this site should be explored (Sport England)	Playing fields are included as part of the wider strategy for the wider South West Rugby development.	
There should be a landscape buffer provided on the employment site allocation eastern / southeastern boundary with any future employment scheme expected to provide the design response. The policy wording should also include requirements to set down building heights closer to the housing allocation in the east / south east of the allocation site to protect the future residential amenity of residents on the housing sites. Policy wording should also make clear that vehicular/HGV access along the sustainable transport corridor will be restricted. (SP)	These matters are addressed in the adopted South West Rugby design code SPD, which covers the eventualities of this land being developed for either housing or employment (as it pre-dates this emerging plan).	
Note South West Rugby allocation has potential impacts to the SRN. Request further information.	This is assessed in the Strategic Transport Assessment. Information is available in the	

17 – South West Rugby employment phase 2		
Issue raised	Officer response	Proposed change (if applicable)
Interest particularly in Potsford Dam Link - alignment, funding, delivery mechanism. Detail in the IDP (NH)	South West Rugby Masterplan SPD which sets out infrastructure costs in Appendix K. This SPD supplements adopted local plan policy.	
Concern about reference to design code which is not supported (SP)	The South West Rugby Design Code SPD is an adopted document. It will remain a material consideration.	

Site 14 – North of Ansty Park

Summary of community feedback

A fuller summary is included in appendix 10.

Issue raised	Officer response
Overallocation in one area	Allocations in this area near the edge of Coventry are not intended as allocations associated with the village, and facilities existing there are not part of the consideration.
Existing congestion will be exacerbated	The Strategic Transport Assessment (STA) models impacts
Mineral safeguarding area within the site	No allocation is identified in the Minerals Local Plan. We are aware of a map indicating mineral safeguarding areas (here). The safeguarded area covers most of the borough and date of publication is unclear.
Support for site for manufacturing use	Noted
Mixed employment profile needed	Site 14 in particular is being allocated for none-warehouse uses. This is included in the development requirements.

Summary of feedback from statutory bodies, stakeholders and site promoters

14 – North of Ansty Park		
Issue raised	Officer response	Proposed change (if applicable)
Add to development requirements: Dedicated cycle and pedestrian links to be provided which connect	Agree to add to requirements in the annex	Add to development requirements

14 – North of Ansty Park		
Issue raised	Officer response	Proposed change (if applicable)
with existing routes on Central Boulevard within Ansty Park and hotel and pub on Combe Fields Road (WCC)		
Allocations at Ansty/Prologis do not promote sustainable patterns of development (x2 SP)	With regard to site 14 (Ansty) it represents an extension to an existing employment area and would further develop the offer in this location, close to the edge of Coventry. See the Green Belt Exceptional Circumstances Topic Paper for an explanation of why this is a sustainable pattern of development.	
Employment sites at Ansty assessed as medium/high risk. Treatment likely to be at Coventry-Finham (Severn Trent Water)	Noted. This will be addressed in further detail through the Stage 2 Water Cycle Study.	
Broadly agree with removal from allocation compared with Reg 18 of sensitive sites, including: Ansty Business Park expansion A46 Walsgrave, and Prologis Ryton – Ansty within IRZ for Coombe SSSI. (Natural England)	Ansty is included as a proposed allocation to expand the existing employment land in this locality. The location within an IRZ is noted in the Stage 2 Site Assessment.	

Site 95 – Crowner Fields Farm

Summary of community feedback

A fuller summary is included in appendix 10.

Issue raised	Officer response
Retention as Green Belt land if current proposals fall through	Through allocation of the site, the green belt boundary will be amended. This forms part of the supply of employment land.
Site should not be removed from Green Belt to prevent further phases of development	Planning approval has been granted on this site, and the allocation reflects this. Similar to other allocations, the green belt boundary will be amended.
Good public transport links needed	Noted. We are exploring potential connections with Coventry's VLR proposals in this area.
Large employment site will have significant impacts on traffic flow in surrounding villages	The Strategic Transport Assessment (STA) models impacts. In addition, traffic

	impacts associated with site 95 have been considered in determining to grant planning permission.
Damage to the heritage and identity of Ansty village	Site 95 already benefits from planning permission.
Lack of demonstrated need for site	Employment need is addressed in the evidence base. This site already benefits from planning permission.

Summary of feedback from statutory bodies, stakeholders and site promoters

95 - Crowner Fields Farm		
Issue raised	Officer response	Proposed change (if applicable)
A number of the proposed allocation sites would be met with recommendations for archaeological investigations prior to the determination of a planning application – site 95 included (WCC)	Noted. This site already has a resolution to grant planning permission.	
Add to development requirements: 1) Provide pedestrian and cycle links to link with existing routes on Central Boulevard (Ansty Park), Ansty Village, Coventry Canal, Binley Cycleway and M6 Junction 2, 2) Pedestrian and cycle permeability through the site, 3) Contributions may be required toward cycle route improvements identified in the LCWIP and Coventry Transport Strategy (WCC)	Agree to add to the development requirements in the annex	Add to development requirements
Sites adjoining canals should require developer contributions to upgrade towpaths – site 95 included (Canal and River Trust)	The site already benefits from planning permission. Were a revised new application to be submitted contributions to towpath upgrades could be considered.	
Requirement setting quantum of open space is not necessary or justified (SP)	This is necessary as part of the allocation to ensure that allocation of the site is not used as a basis to seek to strip away public benefits of open space secured through the planning permission.	

95 - Crowner Fields Farm		
Issue raised	Officer response	Proposed change (if applicable)
It is not clear if the Crowner Fields Farm, Ansty site is proposed for allocation because of the resolution to grant planning permission, or on its own merits. Refers to highway conditions attached to the planning permission and upgrades to A46 Walsgrave junction prior to occupation (SP)	For consistency with other allocations and existing Green Belt employment areas, the site is proposed to be removed for the Green Belt. This step will ensure designation is consistent with the future use of the site. Given the proposal to remove the site from the Green Belt, allocation is necessary to set parameters for its development.	
Overall the Frasers scheme (Crowner Fields Farm, Ansty) will not increase logistics supply as it is not available to the open market (SP)	This matter is addressed under in the Development Needs Topic Paper.	
Query whether more employment land should be identified – Crowner Fields Farm for a single end user. Additional land in proximity to Rugby Town Centre would be welcome for SMEs (WCC)	This matter is addressed under in the Development Needs Topic Paper.	

Site 328 – Prologis Park West and Mountpark, Ryton-on-Dunsmore

Below are the comments made in respect of site 328 (Prologis Park West and Mountpark, Ryton). With reference to the emerging evidence base, this site is not proposed for allocation in the proposed Submission Local Plan.

Summary of community feedback

- **81** individuals commented on this site
- **Ryton-on Dunsmore Parish Council and Bubbenhall Parish Council** comments are summarised with the community feedback

A fuller summary of community feedback is included in appendix 10.

Issue raised	Officer response
Multi-site approach preferable to concentrated large scale development	Noted.

Issue raised	Officer response
Potential to worsen flood risk at Bubbenhall and damage green space	Strategic Flood Risk Assessment level 2 has been undertaken.
Major increase in traffic causing congestion on key roads	This has been assessed through the Strategic Transport Assessment (STA). The STA concludes significant queuing impacts on the Tollbar End Roundabout which is a part of the Strategic Road Network (SRN). This reflects the concern noted from National Highways in the Stage 2 Site Assessment. An alternative site option is concluded to reduce the modelled impacts on the SRN, and as a result we propose not to carry this site forward to Regulation 19 stage.
Lack of public transport connections makes location poor	There is potential for public transport improvements associated with the adjacent Investment Zone.
Ryton already has good access to green open space – country park of less value and doesn't offset harms	We note this opinion.
Ryton already has many Traveller sites	A gypsy and traveller site was proposed as part of the allocation as part of a strategy to collocate pitches with new employment sites. This gypsy and traveller allocation will not be retained if the employment allocation is not taken forward.
Damage to natural environment and local habitats	The Stage 2 Site Assessment notes ecological constraints, and Natural England has expressed concern
Landscape impacts from 'Coventry Way' public footpath	Noted.
Site is on Green Belt land	The Stage 2 site assessment acknowledges the site is located within the designated green belt. A Green Belt Contribution Assessment and Harm Assessment and a paper setting out Green Belt exceptional circumstances are published at Regulation 19 stage, albeit that it is not proposed this site will be taken forward as outlined above.
Coalescence and loss of semi-rural setting	<p>Coalescence is considered in the stage 2 Green Belt assessment for the site.</p> <p>Development of the site would reduce the rurality of the setting. However, the built form would be located on the opposite side of existing employment buildings relative to the</p>

Issue raised	Officer response
	village of Ryton-upon-Dunsmore. Further, the inclusion of a country park (adjacent to parkland on the opposite side of the borough's administrative boundary) could provide some buffer to development in neighbouring Warwick District.
No consultation of residents – no notification or events	The consultation was conducted in the way set out at the beginning of this report, and interested parties can sign up to be kept informed. Events were held as outlined as well. It was not feasible to hold them in all locations but they were open to all regardless of location.
Scale of site is disproportionate	This would have been a strategic site allocation for the borough and the wider area.
Houses prices will fall	This is not a material planning consideration.
Too few amenities in the village – no GP surgery, pharmacy and few shops. Primary school at capacity	Noted. This site was a proposed employment allocation, and the existence of these facilities is necessary for residential development.
Encirclement on homes on Oxford Road by industrial sites	Noted

Summary of feedback from statutory bodies, infrastructure providers, site promoters and other bodies

328 – Prologis Park West and Mountpark, Ryton		
Issue raised	Officer response	Proposed change (if applicable)
A number of the proposed allocation sites would be met with recommendations for archaeological investigations prior to the determination of a planning application – 328 is one of them (WCC)	Noted. This site is not proposed for allocation in the Proposed Submission Local Plan.	
Lack clarity on which areas will be removed from the green belt – green belt retention and country park don't align (South Warwickshire)	This site is not proposed for allocation in the Proposed Submission Local Plan.	

328 – Prologis Park West and Mountpark, Ryton		
Issue raised	Officer response	Proposed change (if applicable)
Small discrepancy in land shown for green belt release on Prologis Ryton site (SP)	This site is not proposed for allocation in the Proposed Submission Local Plan.	
Green Belt boundaries in Ryton should be amended to ensure remaining GB contributes to objective (SP)	This site is not proposed for allocation in the Proposed Submission Local Plan.	Correct green belt boundary
Want to understand the exact mix of uses on Mountfield Park, Ryton (328) (South Warwickshire)	This site is not proposed for allocation in the Proposed Submission Local Plan.	
Strategic need for cross boundary discussions regarding Mountfield Park, Ryton as SWLP proposes allocations at Coventry Airport as part of 'Coventry Gateway' (South Warwickshire)	This site is not proposed for allocation in the Proposed Submission Local Plan.	
Mountfield Park, Ryton - should be a policy requirement for delivery of a bridge from the proposed country park to the country park to the west, accommodating active travel (South Warwickshire)	This site is not proposed for allocation in the Proposed Submission Local Plan.	
Assessment of potential impacts on Bubbenhall village to be undertaken and formalised through policy requirement (South Warwickshire)	Noted. This site is not proposed for allocation in the Proposed Submission Local Plan.	
Unclear how the country park will compensate for loss of habitats from employment land and deliver integration with the Coventry Gateway Community Park (South Warwickshire)	Noted. This site is not proposed for allocation in the Proposed Submission Local Plan.	
Location of Gypsy and Traveller pitches proposed within site to be located for health and wellbeing (South Warwickshire)	This site is not proposed for allocation in the Proposed Submission Local Plan.	
Part of the site is allocated for sand and gravel works in the Minerals and Waste Plan (South Warwickshire)	This site is not proposed for allocation in the Proposed Submission Local Plan.	

328 – Prologis Park West and Mountpark, Ryton		
Issue raised	Officer response	Proposed change (if applicable)
Broadly agree with removal from allocation compared with Reg 18 of sensitive sites, including: Ansty Business Park expansion A46 Walsgrave, and Prologis Ryton – Ryton in IRZ for Brandon Marsh and Ryton Wood SSSI (Natural England)	The meaning of this comment is not clear. Prologis Park West/Mountpark is not proposed for allocation in the Proposed Submission Local Plan.	
Impact of allocations on LWS/PLWS has not been adequately considered (Warwickshire Wildlife Trust)	This site is not proposed for allocation in the Proposed Submission Local Plan.	
Add to development requirements: 1) Pedestrian and cycle permeability through the site, 2) Contributions may be required toward cycle network improvements identified as part of the Coventry Transport Strategy and LCWIP including Cy03 (A45 Tollbar End) and Cy04 (A423 Oxford Road between Tollbar End and Ryton) (WCC)	This site is not proposed for allocation in the Proposed Submission Local Plan.	
Prologis - Recommend a Heritage Impact Assessment and geophysical survey are undertaken prior to allocation. Also recommend a HIA and LVIA undertaken in relation to the Conservation Area and listed buildings prior to allocation. (HE)	This site is not proposed for allocation in the Proposed Submission Local Plan.	
Employment sites at Ryton as per housing sites above - medium/high risk. Treatment at Wolston (Severn Trent)	Noted. To be assessed further through the Stage 2 Water Cycle Study.	

Summary of outcomes – S7

- Further to feedback received and the emerging evidence base as outlined above, Site 328 will not be taken forward as an allocation. An alternative site will be selected (see Walsgrave Hill omission site)

S8 - South West Rugby

- 3 individual comments were raised in respect of this policy
- 2 refer (or are thought to refer) to adopted Supplementary Planning Documents which are not subject to this consultation

S8 – South West Rugby		
Issue raised	Officer response	Proposed change (if applicable)
Note South West Rugby allocation has potential impacts to the SRN. Request further information (1 National Highways)	Noted. As South West Rugby (excluding the Safeguarded land) was allocated in the adopted local plan, and is now subject to planning applications there has already been an assessment of impacts. Cumulative assessments will be considered through the Strategic Transport Model which will be published alongside the Regulation 19 plan.	
S8 F - Existing buffer requirement needs increasing at SW Rugby/Dunchurch (1)	This policy identifies the need for a buffer to prevent coalescence, but does not specify its size. This comment may refer to one of the adopted SPDs regarding South West Rugby. The new plan proposes an area of separation policy between Rugby and Dunchurch/Thurlaston which addresses this point.	
Concern about reference to design code which is not supported (1)	Noted. The South West Rugby Design Code SPD is adopted. It may be revised as required.	
Confusing use of SW Rugby - Area referenced by SW Rugby in S8 is not the same as that in DS8 in adopted local plan. Suggestion to refer to it as Homestead View in same way as Houlton is no longer Radio Masts Site (1)	The area of South West Rugby is the up-to-date position of areas remaining. The adopted local plan included an area off Ashlawn Road for example, now known as Ashlawn Gardens. This is now built out and reference to it in the policy is irrelevant. We do not propose to change the reference to South West Rugby as this title is used throughout adopted policy including the Masterplan and Design Code SPDs.	

S8 – South West Rugby		
Issue raised	Officer response	Proposed change (if applicable)
Wording is weaker than in adopted Local Plan – wording of DS8 should be adopted – reference to Cvi (woodland protection) and F (separation with Dunchurch). Structural protection for GI assets. (1)	A woodland management plan is included in the adopted South West Rugby Masterplan SPD. Wording in the existing local plan ‘requiring’ a woodland management plan is not therefore relevant. We do not agree that wording regarding separation from Dunchurch is weaker than in the adopted local plan. GI assets referenced in the existing policy refer to a GI policies map which is not being carried forward into the new plan for reasons discussed elsewhere in this report.	
S8 (G) is too weak and will not prevent harm to the landscape.	Part (G) is seeking to mitigate impact.	
Provisions in S8 B and C to be delivered before or alongside housing, not afterward (1)	Noted.	

S9 - South West Rugby spine road network

- 4 respondents raised comments in respect of policy S9

S9 – South West Rugby spine road network		
Issue raised	Officer response	Proposed change (if applicable)
Rewrite para 1.23 to highlight that both transport corridors should benefit from a bus gate (4)	The adopted South West Rugby Design Code SPD identifies a modal filter on Cawston Lane. We do not consider it necessary to add to the supporting text.	
Improve supporting text – refer to bus gate (1)	As above.	
Spine road network must be delivered in advance (1)	Delivery will be phased. Elements of the network already benefit from planning permission (e.g. the Homestead Link Road), and others are the subject of live planning applications.	

Climate

- 3 specific comments of support for policies across this chapter
- Support for individual policies in the chapter noted below in respect of each

General comments

Issue raised	Officer response
Climate policy needs to address use of private car due to unsustainable locations for development (1)	The spatial strategy is addressed elsewhere in this report.
Green policy & affordable developments are in conflict (1)	We disagree. The viability assessment of the plan includes relevant cost uplifts associated with policies in the section. Our ambition is to deliver both.

CL1 – Net Zero Buildings

- 2 specific comments of support noted
- 62 comments attributed to this policy

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
Net zero policy risks viability of development. (11)	<p>We acknowledge that net zero building standards may have cost implications. However, the purpose of Policy CL1 is to ensure that new development contributes to Rugby Borough’s climate commitments and delivers genuinely net zero carbon buildings at the earliest opportunity.</p> <p>Notwithstanding this, we propose to implement some amendments to the policy (as recommended by the Net Zero Carbon Policy: Evidence Report), which the evidence suggests reduces cost uplifts whilst still delivering net zero carbon development in operation.</p> <p>We think this strikes a balance between delivering net zero carbon buildings and</p>	Amend policy CL1 as recommended

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
	<p>maintaining development viability.</p> <p>The Viability Study published at Regulation 19 stage tests this policy and evidences its viability.</p>	
<p>Net Zero policy is inconsistent with WMS and unsound (5)</p>	<p>This matter is addressed in detail in the Net Zero Policy Evidence Document. However, in summary we think the policy is:</p> <ul style="list-style-type: none"> - Consistent with statutory duties and NPPF policy. - Supported by robust, recognised metrics (EUI and SHD) that accurately reflect energy performance. - Legally justified, including considering the Supreme Court decision, which confirms the WMS is not unlawful but does not constrain local authorities from setting justified, more effective standards. - Supported by growing precedents from other local plans post-WMS 2023. 	
<p>Policy should refer to embodied carbon (1)</p>	<p>We recognise the importance of embodied carbon, whereby the construction materials and methods contribute to the building's overall carbon footprint. We will encourage consideration of these matters, but have chosen to focus policy at this time on buildings achieving operational net zero.</p>	
<p>Exceptions to being fossil fuel free should be included – for emergency and life safety systems, essential back-</p>	<p>The Preferred Option wording of CL1 requires buildings to be fossil fuel free (paragraph A.ii),</p>	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
<p>up systems serving buildings with functions of critical importance, such as in hospitals, police stations and water treatment plants as examples, as well as essential back-up systems serving data centres or critical server infrastructure (1)</p>	<p>but does not explicitly allow for exceptions for critical systems. Paragraphs A.iii and A.iv relate only to on-site renewable energy generation targets, not fossil fuel-free compliance.</p> <p>In practice, the Council can accommodate technically justified exceptions for critical systems, but to provide certainty for developers and clarity for stakeholders, it is proposed that the policy is amended to explicitly allow these exceptions.</p>	<p>Policy amended to exclude circumstances where the use of fossil fuels is technically necessary for emergency and life-safety systems or essential systems serving buildings with critical functions</p>
<p>Renewable energy target too onerous (6)</p> <p>i) It will not be possible for most building types to achieve 120kWh per square metre of building footprint per year.</p>	<p>CL1 requires generation of at least the same amount of renewable electricity on site as the electricity they demand over the course of a year, such demand including regulated and unregulated use. This is necessary for buildings to be operationally net zero.</p> <p>Many building types will not need to generate 120kwh/m2/yr to match the building’s energy use (the requirement of the policy). This requirement is for buildings such as apartment blocks for example, where additional storeys increase the floorspace and the EUI, but the footprint of the building (and therefore available roof space) is unable to accommodate sufficient solar panels to meet the EUI in full.</p> <p>The renewable energy generation benchmark of 120 kWh per m² of building</p>	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
<p>ii) Policy should align with the UK Net Zero Carbon Building Standard (UKNZCBS)</p> <p>iii) extending the policy to unregulated use could disincentivise the installation of EV charging points</p>	<p>footprint per year is underpinned by modelling undertaken in other local authority areas, including South Oxfordshire District, Vale of White Horse District and Essex County. This evidence demonstrates that for the majority of common development archetypes, this level of generation is technically achievable through on-site solar PV.</p> <p>Typically, achieving 120 kWh/m² equates to utilising around 70 % of the available roof area, which is feasible for most residential and low-rise non-residential buildings. This approach is consistent with best practice emerging in other authorities and supports the local transition to net zero carbon in operation.</p> <p>This approach is aligned with the core principles of UK Net Zero Carbon Buildings Standard: prioritising ultra-low energy demand and on-site generation first, then addressing residual emissions through credible local measures.</p> <p>The definition of unregulated energy within Policy CL1 relates to energy consumed by the building itself (e.g. lighting, plug loads, appliances), not to energy associated with electric vehicle charging or wider transport uses. This ensures the target reflects the true operational performance of the building without</p>	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
	penalising developments for providing EV infrastructure.	
Net zero policy should align with building regulations (6)	<p>Policy CL1 goes beyond the minimum standards set by building regulations (including the Future Homes Standard) because Building Regulations alone will not deliver net zero operational carbon buildings.</p> <p>Rugby Borough has an ambition to achieve net zero carbon development at the earliest opportunity, consistent with its Carbon Budget Assessment, the Climate Change Act 2008, and NPPF 2024 guidance on proactive climate mitigation.</p> <p>The choice of metrics is discussed in the Net Zero Policy Evidence report, alongside detail of similar adopted policies produced by LPAs across England.</p>	
Inconsistent with Para 164(b) of the NPPF	<p>Paragraph 164(b) requires local requirements to be consistent with national policy, not limited to Building Regulations. The NPPF (2024) also requires plans to take a proactive approach to reducing greenhouse gas emissions and to deliver mitigation in line with the Climate Change Act 2008.</p> <p>The Planning and Energy Act 2008 explicitly empowers Local Plans to set higher energy efficiency standards than Building Regulations, provided they are evidence-based.</p>	
Lack of evidence to justify net zero policy (2)	We appointed specialist consultants to produce the	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
	evidence base for this policy. Whilst this evidence base was not complete for publication at the time of the Preferred Option consultation, it will be published at Regulation 19 stage. We consider the policy to be justified based on this evidence.	
Lack of clarity over what "ultra-low energy" and "fossil fuel free" means (4)	<p><i>Ultra-low energy</i> is defined clearly in CL1 through quantifiable and measurable standards.</p> <p><i>Fossil fuel free</i> means no fossil fuels are used in normal building operation, with energy demands met through electricity and/or renewables. Provision may be made for exceptional cases, such as emergency back-up systems for critical infrastructure, as outlined above.</p> <p>These definitions are consistent with national best practice and standards, including the UK Net Zero Carbon Buildings Standard and precedent local plans.</p>	
May not be efficient use of land to generate renewables on site (3)	<p>We expect in most cases that renewable electricity would be generated on plot (e.g. solar panels on the roof). This would not be an inefficient use of land.</p> <p>On-site renewables are required to reduce reliance on grid-supplied fossil fuels and support net zero operational carbon. For non-residential developments, particularly large footprint buildings, a balance is achieved between generating on-site energy and energy efficiency measures, ensuring the most effective</p>	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
	approach to reducing emissions.	
Argue policy CL2 conflicts with CL1 by imposing strict control (2)	<p>There is no conflict between CL1 and CL2, as the policies operate in distinct domains:</p> <ul style="list-style-type: none"> • CL1 ensures building-integrated renewables contribute to net zero building operation. • CL2 regulates free-standing renewable energy developments and large-scale low-carbon infrastructure. 	
Disagree with the requirement for all new buildings to be net zero - Not sufficiently flexible, fit for purpose or well evidenced. Notes deviation from national requirements, and that some similar policies have not been accepted at examination. Reference also to WMS March 2015. Stepped introductory approach advocated. (1)	<p>Matters of flexibility and evidence have been addressed in response to issues above, as have the metrics and relationship to national requirements.</p> <p>Reference to the WMS 2015 is not relevant as this was superseded by the WMS December 2023, which has been referenced above.</p> <p>We do not consider a stepped or phased approach appropriate, as immediate action is required to avoid locking in high-carbon buildings and to meet national carbon reduction targets. Evidence from other local plans shows that net zero policies can be successfully implemented from the outset.</p>	
Onsite renewables undesirable and Part B should be deleted (specific reference to the use of EUI metric) (2)	On-site renewable energy generation is a key component of achieving net zero operational carbon and is widely considered feasible in new developments, including housing, offices, and schools. Paragraph A.iv provides flexibility where on-site	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
	<p>generation is not technically feasible, ensuring the policy remains practical and deliverable.</p> <p>The policy evidence document sets out in some detail why the Energy Use Intensity (EUI) metric is used, but in summary it is because: it is more accurate than TER/SAP based metrics, it is widely endorsed by professional bodies, and it addressed both regulated and unregulated energy uses.</p>	
<p>Policy should allow for conversion to fossil fuel free, and challenges of assessing future energy use at outline application stage should be acknowledged. Also should be viability tested. (1)</p>	<p>The policy recognises that at the outline application stage, it may not be possible to fully define energy use patterns due to unknown end-user requirements. Applicants are expected to provide energy strategies that demonstrate how the building could achieve net zero operational carbon, using representative assumptions for likely building use.</p> <p>Detailed ‘as-built’ assessments will be required prior to occupation (paragraph 2.3.2), ensuring that buildings meet policy standards once the end-user is known.</p> <p>Viability is addressed above.</p>	
<p>Not clear how officers will assess this policy and whether the Council has sufficient resources (1)</p>	<p>Policy CL1 sets out clear, measurable metrics (Energy Use Intensity and Space Heat Demand) and requires submission of an Energy Statement with each planning application.</p> <p>These measures provide officers with a structured and</p>	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
	<p>evidence-based framework for assessment.</p> <p>The requirement for energy statements and standardised metrics streamlines the assessment process, reducing the burden on officers.</p> <p>Where necessary, the Council may commission third-party verification for complex or major developments.</p>	
<p>Aiii shouldn't include unregulated energy – high variability in unregulated energy use across different occupiers</p>	<p>The inclusion of unregulated energy in A(iii) reflects best practice, including precedent local plans and the UK Net Zero Carbon Buildings Standard, which treats both regulated and unregulated energy together to give a true picture of operational energy use. This approach prevents a material understatement of the carbon impacts of development.</p> <p>The Council acknowledges that some industrial and commercial occupiers have bespoke, variable energy demands. For this reason, the policy has been carefully worded to require a proportionate contribution to renewable energy generation, not a rigid one-to-one offset of all unregulated demand. This provides flexibility and avoids deterring occupiers or investors while still ensuring that predictable energy loads are considered at design stage.</p> <p>We therefore consider the inclusion of unregulated</p>	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
	<p>energy to be justified, proportionate, and in line with national and industry guidance.</p> <p>As above, EV vehicle charging is excluded from this – unregulated energy in the operation of the building.</p>	
<p>Amend clause A(iv) to say "unless suitable justification can be provided..." 120kWh per square metre of building footprint per year may not be an achievable standard for all types of non-residential uses, since the energy demands of a warehouse differ from those of a community building (for example). The energy demands would also be dependent on the available roof space for PV (1)</p>	<p>The Council recognises that not all building typologies will have identical energy demand profiles or sufficient roof space for renewable generation (for example, high energy-use non-residential buildings such as care homes or hotels).</p> <p>To avoid misinterpretation, a minor clarification could be made to Clause A(iv) to confirm that where applicants can demonstrate, with robust evidence, that the standard is not achievable for specific building typologies, alternative rates of energy generation may be considered. The Council considers that the target remains achievable for most building archetypes.</p>	<p>Clarification to Clause A(iv) to confirm that where applicants can demonstrate, with robust evidence, that the standard is not achievable for specific building typologies, alternative rates of energy generation may be considered</p>
<p>Clause B heating demand and EUI figures are aligned with the 2050 targets under the Net Zero Carbon Building Standard they should be aligned to 2030 targets (1)</p>	<p>Residential SHD targets: The NZCBS sets a Space Heating Demand of 15–20 kWh/m²/yr for all residential buildings for both 2030 and 2050, which is already reflected in Clause B. It is proposed however, that the policy is be amended for Regulation 19 to reduce this requirement to assist viability.</p> <p>EUI targets for residential buildings: The 2030 NZCBS EUI benchmark is 39-42</p>	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
	<p>kWh/m²/yr for homes, while the Council’s Preferred Options consultation document targets are aligned with the UKNZCBS longer-term target for 2040 onwards, ensuring that new buildings contribute to net zero operational carbon over their lifetime.</p> <p>We are however considering the potential to adjust the EUI target for residential to a slightly less stringent target that the cited data (in Rugby’s forthcoming evidence report) indicates would have less cost uplift while still being feasible to meet the net zero energy balance using on-site renewable energy. That target would be closer to the UKNZCBS 2030 target.</p>	
<p>Clause C(ii) – a maximum of 35 kWh/m²/yr for warehouses and light industrial uses is too low based on our experience/targets, and therefore should be raised to a more realistic figure (1)</p>	<p>The policy target of 35kWh/m²/year in non-conditioned/non-refrigerated industrial buildings reflects energy modelling feasibility evidence cited in the evidence report to be published at Regulation 19 stage. It is also identical to the 2025 target for unconditioned warehouses/storage in the UK Net Zero Carbon Buildings Standard (UKNZCBS), which was based on a combination of bottom-up evidence on what is feasible to achieve and also top-down evidence of what performance is necessary for the UK to reach its climate commitments. The UKNZCBS target tightens each year, reaching 20kWh/m²/year</p>	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
	<p>in 2050, but the Rugby target only reflects the current year and thus is arguably already at the most relaxed level possible without compromising the duty to meet climate change. We note that the UKNZCBS also sets much laxer kwh/m²/year targets for other types of industrial, which are:</p> <ul style="list-style-type: none"> • Conditioned storage: 80 in 2025, falling to 40 in 2050 • Cold storage: 160 in 2025, falling to 65 in 2050. <p>These are not incorporate as published evidence of feasibility on these other types of industrial has not been identified. However, policy point c.ii does clarify that the target of 35kWh/m²/y total energy use applies only to unconditioned/unrefrigerated industrial buildings, and allows other types of industrial building to meet a far less stringent target of 40kWh/m²/y for regulated-only energy use. Studies elsewhere have found regulated energy to be slightly less than half of total energy use in a warehouse, therefore Rugby’s regulated-only target of this could imply a total EUI of 80 kWh/m²/year, but applicants could exceed this where the proposed use of the building comes with unavoidably higher unregulated energy uses such as server farms or refrigeration. This allowance within the policy allows a significant degree of flexibility</p>	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
	<p>where there are legitimate reasons to exceed the target, while the cited energy modelling evidence shows that the target should be feasible in the type of building it applies to.</p>	
<p>Amend energy statement reporting requirements in supporting text paras 2.3.2, 2.3.3 and 2.4 (1)</p>	<p>As-built energy calculations (para 2.3.2): The requirement to submit as-built energy calculations is standard practice and reflects the actual building delivered, including any changes to design or specification compared to the design stage.</p> <p>This process is usually undertaken as part of a discharge of condition and ensures that energy performance has not been compromised during construction. It is therefore proportionate and consistent with routine planning procedures.</p> <p>Post-occupation monitoring (para 2.3.3):</p> <p>This requirement applies only to larger proposals and is similar to established approaches in London policy.</p> <p>The purpose is to understand real energy performance once homes are occupied, providing valuable learning for both the Local Planning Authority (LPA) and the developer.</p> <p>Data collection can be done unobtrusively, without affecting residents or delaying</p>	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
	<p>occupation, and can inform future benchmarks and improvements in building performance.</p> <p>Use of accurate methodologies (para 2.4):</p> <p>The guidance encourages applicants to use more accurate methodologies or free conversion tools to translate SAP/SBEM outputs into reasonably accurate EUI and SHD outputs.</p> <p>Policy CL1 aims to ensure that actual real-life outcomes are achieved rather than theoretical performance on paper.</p> <p>National guidance (Part L 2021) recognises that SBEM outputs are not sufficiently accurate for forecasting operational energy in non-residential buildings above certain size thresholds; instead, methods such as CIBSE TM54 are required.</p> <p>Similarly, the RICS Whole Life Carbon Assessment methodology (indirectly nationally endorsed in the National Model Design Guide which encourages whole life carbon targets to be part of design codes) does not permit SAP or SBEM for the in-use carbon calculation, supporting the need for more robust reporting.</p>	
<p>Policy as written does not mention the importance of the current building stock in diminishing carbon emissions. The local plan should encourage and</p>	<p>The Council acknowledges the important role that the existing and historic building stock</p>	

CL1 – Net Zero Buildings		
Issue raised	Officer response	Proposed change (if applicable)
recognise the benefits of sympathetic restoration, retention, refurbishment and retrofitting of historic buildings and reference should be made to regular building maintenance. (1)	plays in reducing carbon emissions. Policy CL1 focuses on new buildings because they represent a significant opportunity to ensure that new development contributes to the borough’s net zero ambitions in operation.	
Suggested amendments to wording – principally seeking to include phases “where feasible” and “should target” (1)	Matters of feasibility have been addressed above, in the emerging evidence base. Amendments to the policy are proposed to clarify the position where energy generation requirements are assessed to be unfeasible. However, we feel the suggested phases would dilute the policy to an unacceptable level.	
Targets will deter builders and make homes unaffordable (1)	As outlined above, viability of development is being considered in the development of policies, and amendments proposed for Regulation 19 to reduce cost uplifts.	
Suggestion to restrict net-zero building policies to major developments initially – as major builders have better capacity (1)	We disagree. There are many precedents for the policy approach set out, and it is supported by the evidence base.	
New homes should have solar panels as standard (6)	This policy requires onsite renewable energy generation to match energy use. This is likely to include solar panels.	
New homes should use rainwater harvesters (1)	This comment has been attributed to policy CL1, but is perhaps more relevant to CL3 which discusses water efficiency.	

CL2 – Renewable Energy and Low carbon technology

- 3 specific comments of support
- 44 additional comments noted below

CL2 – Renewable Energy and Low Carbon Technology		
Issue raised	Officer response	Proposed change (if applicable)
Argue policy CL2 conflicts with CL1 by imposing strict control (2)	The policy reflects national Green Belt policy, with which the local plan is required to be consistent.	
There are site areas within policy CL2 for wind turbines which are crossed by or in close proximity to National Gas transmission assets (1)	The areas identified as suitable are based on provisional assessment, detailed constraints would need to be considered at planning application stage.	
Criterion D is outdated (1)	This is not outdated, it reflects the current threshold for consulting Natural England on planning applications	
Criterion F is more restrictive than NPPF para 168 (1)	We disagree, this comment appears to be based on a misreading of the policy.	
There is a significant requirement for renewable energy. There may be capital costs involved in a connection license, and delays in securing the necessary capacity. (1)	Noted.	
Consider that the impact on heritage and landscape character should be included as specific policy criteria against which large scale energy generation and storage schemes should be addressed (1)	This is not necessary. It is not necessary to duplicate these considerations across multiple policies. There are existing heritage and landscape policies (policies D4 and EN2) which apply these considerations to all relevant planning applications.	
No map is included for locations for wind turbines in the Preferred Options document. If further work is to be undertaken please refer to Historic England advice (1)	Reference to HE advice is noted. The interactive policies map identifies preferred locations for wind turbines.	
Design expectations for renewable energy proposals should make reference to paragraphs 4.7.1 and 4.7.2 of NPS EN1 (Part A) (1)	While this is potentially a material consideration, this policy statement is applicable to nationally significant	

	infrastructure projects. It isn't necessary to cross refer to it.	
Site for wind turbines near Great Brook Ground raises environmental and public health concerns (15)	Great Brook Ground is a road within the Houlton development. Appropriate distance buffers to existing buildings and residential properties were applied in identifying areas suitable for wind energy development.	
Warehouses should be required to fit solar panels to the rooves instead of using green space (14)	Policy CL1 (Net Zero Buildings) seeks to make all new buildings net zero in operation. Part of how that would be achieved could be through on plot (i.e. on roof) solar panels although there may be other means of achieving compliance. Whilst this could be applied to new buildings, there remains a need and a desirability to accommodate more renewable energy generation through stand alone renewable energy schemes.	
Solar panels should be retrofitted to buildings built since the last plan period (1)	It is not possible to apply such a requirement retrospectively through the planning system.	
Only in very special circumstances should renewable energy be allowed in Green Belt (1)	This is the position in national policy and is reflected in the policy text of CL2.	
Text is not robust enough (Part D) – prevent agricultural land for solar farms. Focus on wind power (1)	The purpose of the policy is not to prevent all agricultural land from being developed for solar farms. That would not be consistent with national policy.	
Strong opposition to wind turbines at Houlton - remove this policy. Noise disturbance and use of farmland (1)	Noted.	
No solar farms permitted on high grade agricultural land (1)	Best and most versatile farmland is addressed in Part D of the policy.	
Wind turbines are inappropriate in the Rainsbrook Valley (1)	Part C of the policy refers to wind turbines within areas shown on the policies map. No area is indicated on the map within the Rainsbrook Valley.	

CL3 Water Supply and Efficiency

- 12 issues attributed to this policy with 16 comments
- No specific comments of support

CL3 – Water Supply and Efficiency		
Issue raised	Officer response	Proposed change (if applicable)
General		
<p>Duplicating the technical requirements of Building Regulations is unnecessary (3)</p> <p>CL3 and CL4 - duplicating building control? (1)</p>	<p>We agree in principle but infer this comment to be referring to Part C, and specifically the requirement for water consumption exceeding 110l/person/day. This is an optional Building Regulation requirement, which we consider to be necessary based on the borough being in an area of high water stress as set out in supporting text 2.8.</p> <p>The comment re CL4 will be addressed below in respect of that policy.</p>	
<p>Requirement for a Preliminary Risk Assessment for planning proposals on land which is/has been subject to a land use(s) which have the potential to have caused contamination of the underlying soils and groundwater. This has been partially addressed in EN7 and CL3 (EA)</p>	<p>Land contamination is referenced within policy EN7. We will add to the supporting text of EN7 to refer to the requirement to Preliminary Risk Assessments and to 'The Environment Agency's Approach to Groundwater Protection.'</p>	<p>Add supporting para to EN7 (now EN8 – Environmental Protection)</p>
<p>For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. (1)</p>	<p>Noted.</p>	
Part A		
<p>Criteria A unnecessary, Criteria C duplicates existing controls, Criteria D is not precise. Any requirement that impacts financial viability shouldn't be included. (1)</p>	<p>A – we disagree that this is unnecessary.</p> <p>C – see comments below</p> <p>D – see comments below.</p> <p>Financial viability has been assessed, and evidence will be published.</p>	

CL3 – Water Supply and Efficiency		
Issue raised	Officer response	Proposed change (if applicable)
Part A: Cannot guarantee water supply (1)	Noted.	Delete 'guaranteed'
Criteria A unnecessary – Development won't come forward without water (1)	Noted – see comment above regarding no guarantee of water supply	
Part B		
Potential ambiguity in Criterion B - delete or refine (1)	See comment and response below regarding proposed amended wording.	See below
Suggest amended wording for part B: "Development should follow the hierarchy (order of preference for foul drainage connection) as set out in the National Planning Practice Guidance. The Council requires non mains drainage proposals to assess the potential impacts upon water quality to ensure no detrimental impact on the water environment." (1 - EA)	Both the Environment Agency and Severn Trent Water have suggested amended wording related to Part B, but they are not the same. We will use the wording suggested by STW below.	
Suggested wording: <i>New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.</i> Supporting text - see rep (1STW)	Agree to substitute this wording for part B	Substitute suggested wording for Part B
Part C		
Water Cycle Study not published and therefore no justification for policy – specifically criterion C (1)	Criterion C expands the current local plan policy SDC4 in respect of water efficiency, which also specifies 110 litres/person/day in residential development. In addition, the published Water Cycle Study sets out the case for maximising water efficiency (see pages xvii-xviii), which is also highlighted in the text on p22 of the Preferred Options Consultation	

CL3 – Water Supply and Efficiency		
Issue raised	Officer response	Proposed change (if applicable)
	Document. We therefore consider this criterion justified.	
To meet policy (reduced water consumption) rainwater harvesting required - usually unviable on housing (1)	The policy does not specifically reference rainwater harvesting.	
Support water efficiency policy. Suggested wording: <i>New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.</i> Supporting text -see rep (1 STW)	This wording matches Part C of the Preferred Option policy, with the omission of reference to Building Regulations at the end.	
Part D		
Part D: Recommend that all non-residential developments of 1000sqm or more should achieve BREEAM excellent standards for water consumption when water sources are under pressure (1 Environment Agency)	No change required – major development is 1000sqm.	

CL4 – Climate adaptation

- 1 specific comment of support for this policy
- 8 summarised comments attributed to this policy below.

CL4 – Climate adaptation		
Issue raised	Officer response	Proposed change
Policy not required as criteria (i) is superseded by Part O Building Regs and criteria ii and ii duplicate policy EN6. Some representations refer to duplication of the Sustainable Design SPD (4)	Part O of Building Regulations applies to residential development only, whereas CL4 seeks to address all development types. Part O requires measures to limit unwanted solar gains in summer and provide adequate means to remove heat from the indoor environment.	

	<p>Criterion ii includes design for urban cooling which does not duplicate EN6.</p> <p>Criterion iii refers to EN6 and D5.</p>	
<p>The effectiveness of solar PV will be impacted by aspect and shading of which are factors in achieving climate resilience (CL4 Ai&ii) and EN5. A well designed development will need to ensure both are met. (1)</p>	<p>Refer to response under CL1</p>	
<p>Suggest that CL4 is broadened to encompass reducing energy consumption in existing buildings (not just 'new development') (1)</p>	<p>We recognise the benefits of reducing energy consumption in existing buildings, however such a policy can only be applied through the planning system where development proposals are made via a planning application.</p>	
<p>CL4 Wording is too vague and needs further detail (2)</p>	<p>As set out in the response above, for residential development, this is addressed in Building Regulations.</p>	

Economy

- 2 comments of support for the policy content of the ‘economy’ section generally, based on the summary

General comments		
Issue raised	Officer response	Proposed change (if applicable)
Vacant office/shop space in the town centre should be repurposed to reduce building elsewhere (2)	This type of development would be supported in principle within the town centre – see town centre policy C1 and allocations proposed in the town centre. Where sites are allocated within the centre, these can be identified in supply of land for different uses.	
Definition of employment uses too limited. Local recruitment strategies encouraged, including across the FEMA where appropriate (1)	We disagree. Policies in this section of the plan focus on protecting existing employment land, new employment development and the rural economy. Other uses may be addressed in the ‘centres’ policies.	
New policies must be more flexible for retail, leisure and community uses (2)	We have attributed these comments to the ‘economy section’ of the plan, however retail and main town centre uses are addressed within the ‘centres section’, and leisure and community uses are included in the ‘wellbeing’ section. Taken as a whole, we think the plan takes an appropriate approach to the uses referenced.	

E1 – Employment land protection

- 9 comments attributed to this policy,
- A number of comments/issues originally attributed to this policy have been assessed as more pertinent to the ‘strategy’ section and relocated there.
- 1 comment of support for this policy

E1 – Employment Land protection		
Issue raised	Officer response	Proposed change (if applicable)
Lack of short-term need for warehousing – may be overdelivered early (2)	Policy E1 is seeking to protect and allocated or designated for employment uses from going to non-employment uses. Similar comments are addressed under policies S3 and S7.	
Boundaries for Ansty Park to be amended (1)	Repetition of issue addressed under policy S5 – agree to amend the boundaries.	
Expand policy to support redevelopment of employment sites (1)	The policy is aimed at preventing land for employment being converted to a different (non-employment) use. Redevelopment of employment land for employment is not limited by this policy, and policy E2 (B) directly refers to redevelopment of employment sites.	
Land at Ryton Lodge should be identified for employment retention – unsuitable for housing due to neighbouring uses (1)	We have not chosen to identify all existing employment areas. Neighbouring uses would be a material consideration in any planning application to change the use of the land.	
Lack of strong protection for change of use from employment site – allows justification (1)	The purpose of this policy is protecting employment land from a change of use to non-employment. Part B seeks to set a high bar for change of use.	
Request for restrictions on operating hours and light pollution at warehouses (2)	Such restrictions would be considered on a case-by-case basis at the time of a planning application, and conditions attached to any approval as appropriate.	
Policy needed to ensure warehouses cannot be built right next to homes – protect against situations like Nacton in Ipswich (1)	Noted. For SW Rugby, the Design Code SPD addresses this issue. For other schemes, this would be a matter for consideration at planning application stage.	

E2 – Employment development

- 2 expressions of support for this policy in summary
- 15 additional comments on this policy

E2 – Employment development		
Issue raised	Officer response	Proposed change (if applicable)
The Economic Strategy outlines a need for rural employment development which the PO does not address (1)	Policy E3 specifically addresses the rural economy.	
E2 (Ei) is too restrictive. Suggest adding “unless material considerations indicate otherwise” (1)	E(i) states that development should not undermine the continuance of a viable agricultural use. We consider this protection necessary.	
Existing warehouses are struggling to recruit suggesting there is a lack of need for further employment in this region (8)	The need for employment development is established in the evidence base and derives from both local need and regional strategic need.	
Policy too restrictive of non-allocated employment land. Suggest add bullet: It would meet an identified need that would not be met through extant allocations (3)	We disagree. The plan identifies need over the plan period and identifies sufficient land to meet that need.	
Support should be expressed for the repurposing of non-employment buildings for small scale affordable employment premises. (1)	This is already supported by policy E2 (E) ii.	
Wording of policy E2 is unclear – unclear whether conversion of existing buildings, expansion or infilling. If so, in agreement (1)	We don’t agree that it is unclear. Expansion of buildings and infilling are not the same thing. Infilling can include new buildings.	

E3 – Rural economy

- 1 expression of support to this policy with specific reference to A(iv) equine and equestrian development from the British Horse Society.
- 4 other comments attributed to this policy

E3 Rural economy		
Issue raised	Officer response	Proposed change (if applicable)
E3 should be amended so that it doesn't unduly restrict development opportunities at Dunchurch Pools Marina which could support tourism (1)	We do not see a reason why policy E3 would unduly restrict development opportunities at Dunchurch Pools Marina which would support tourism. Such development is encouraged by	

	this policy, the only exception being permanent residential moorings.	
Inconsistent with national policy (para 88) – too restrictive especially i & ii (1)	We disagree that the policy is too restrictive and inconsistent with paragraph 88 of the NPPF. A(i) and (ii) refer to scale, and aim to ensure development is appropriate to the setting.	
Renewable energy is a form of farm diversification and could useful be included in economy policies (1)	Renewable energy is specifically addressed in policy CL2.	
Greater limitations on agricultural buildings – farms putting up too many barns and intensely farming livestock. Limit size. (1)	The policy sets out the types of development which are acceptable in principle. The detail of any proposal would be considered on a case-by-case basis in accordance with other policies in the plan.	

Centres

- 2 representations summarise general support for policies within this section.

C1 – Rugby town centre

- 1 expression of support for policies C1 and C2 (in addition to general support across the chapter)
- 11 other individual comments have been attributed to this policy

C1 – Rugby town centre		
Issue raised	Officer response	Proposed change (if applicable)
Welcome that the enhancement of heritage buildings is included within the policy as a placemaking principle. However, suggest it would be useful to show these heritage buildings/assets on the accompanying plan on p30 (1)	We think that the plan referenced regarding the town centre is clearer without adding heritage assets. These are however publicly available via Historic England’s webpages.	
Support should be expressed for the repurposing of non-employment buildings for small scale affordable employment premises. (1)	This type of development is generally supported in urban areas, subject to compliance with other policies.	
Retail sites should be focused on the town centre and not at out of town sites which are hard to access without a car e.g. Elliots Field (1)	We agree. This is embedded in the sequential test set out in national planning policy, and referenced in policy C2.	
Small independent shops will be unable to afford rates in new retail centres and large retailers outside hubs will out-compete them (2)	New retail centres are not proposed in this policy. Developments outlined in Part A seek a mix of different uses and street based mixed use development.	
Increased pedestrianisation and reduction in through traffic would help revitalise town centre (1)	We acknowledge this point. There is ongoing work beyond the scope of the local plan which is looking at for example public realm improvements and regulatory tools such as Traffic Regulation Orders to support pedestrian use of the town centre. This is in addition to principles in this policy designed to enhance the pedestrian environment in the town centre.	

C1 – Rugby town centre		
Issue raised	Officer response	Proposed change (if applicable)
Proposals for housing in shopping centres is damaging to town centre – permeant loss of retail (1)	We do not agree. There is a need for a mix of uses in the town centre to support its future vitality.	
More emphasis needed on regenerating the town centre (2)	This is the first time that Rugby has included a specific policy on regeneration of the town centre in the local plan. In addition, allocations for development in the centre have been included for the first time.	
Policy C1 is not clear on the purpose & meaning of 'downgrading for traffic of North Street & part of Church Street' (1)	Please see Town Centre Public Realm Masterplan, as referenced in the supporting text.	
Council should proactively encourage brownfield sites with permission to begin development (1)	The Council is looking at options to achieve this. For example, options for bringing forward Rugby Central were discussed by Cabinet on 01 December 2025. This site is further to be included in the Regulation 19 plan.	Include Rugby Central

C2 – Main town centre uses

- 1 expression of support for policies C1 and C2 (in addition to general support across the chapter)
- 3 further comments have been attributed to this policy

C2 – Main town centre uses		
Issue raised	Officer response	Proposed change (if applicable)
Support should be expressed for the repurposing of non-employment buildings for small scale affordable employment premises. (1)	See response to same comment under C1.	
Houlton and SW Rugby shouldn't be treated in the same category as district centres – SW Rugby is integrated with Rugby, Houlton is detached (1)	The categorisation of a district centre is related to the scale of the centre and its content in terms of uses and facilities. Neither the Houlton nor the SW Rugby district centres are yet delivered but are evidenced in the masterplans associated with each development.	

Request for new retail facility at Crick/DIRFT – would be attractive for residents of Houlton too (1)	This area is largely beyond Rugby’s administrative boundary. It would not however align with the policy approach to retail.	
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C3 – Local and District Centres

- 8 comments attributed to this policy

C3 – Local and district centres		
Issue raised	Officer response	Proposed change (if applicable)
Lack of amenities available at more recent new developments which is not improved in this plan – Houlton development has focussed on houses not services or infrastructure (2)	The outline planning consent details the mix of uses planned for Houlton, and this policy (and C2) refer to the district centre. Some infrastructure has been provided including the secondary school and a primary school with a second primary school under construction. Other are envisaged to come forward as the site builds out. One of the reasons for allocating district/local centres in new housing areas is to support their delivery.	
Amend policies map to encompass all of SW Rugby district centre (1)	Noted	Amend policies map
Policy on new centres should have more flexibility – vertical mixed use may be undeliverable or unviable in some locations, therefore shouldn’t be required in all cases (1)	Noted. We will review wording	Review wording.
Support should be expressed for the repurposing of non-employment buildings for small scale affordable employment premises. (1)	As set out in response to same comment under policy C1	
More supermarkets needed in areas of new housing (1)	The Retail and Main Town Centre Uses Study sets out the evidence in relation to retail need (and other uses). It concludes not quantitative need for convenience retail but notes growth in the discount food retail market.	
Local centre proposals confine residents to own little hubs rather	District and local centres are seeking to enable residents to	

C3 – Local and district centres		
Issue raised	Officer response	Proposed change (if applicable)
than allowing mixing across communities (1)	conveniently access facilities and services where they live (e.g. food store, GP services, etc). They would not confine residents to this area.	
New Bilton should be considered as a local centre and considered part of the regeneration strategy (1)	The Local Centres Study (2024) sets out the approach to identifying local centres. New Bilton was considered (as two areas: New Bilton Inner and New Bilton Outer). The reasons they were not identified as local centres for the purposes on the local plan are set out in the report.	

C4 – Neighbourhood hubs

- 1 comment attributed to C4 (and other policies in this plan section)

C4 – Neighbourhood hubs		
Issue raised	Officer response	Proposed change (if applicable)
Support should be expressed for the repurposing of non-employment buildings for small scale affordable employment premises. (1)	See response to same issue under C1.	

Environment

- 1 respondent suggests that policies for environmental protection are too weak but does not expand on why or how they might be strengthened
- 3 general comments of support for policies across this chapter
- 13 general comments on these policies summarised below

General comments		
Issue raised	Officer response	Proposed change (if applicable)
Lack of protection for green space and wildlife ecosystems within the plan (5)	We disagree. Policies EN1, EN2 and W2 address green space and ecological protection.	
Omission of current and potential wildlife corridors from the policies map and from the draft plan – as applied by current policy NE2 (1)	Policy NE2 in the adopted local plan identifies existing and potential green infrastructure corridors. Having reviewed this policy, we do not consider that it clearly directs decision makers regarding planning applications made in these corridors, and on this basis have not proposed to carry this policy into the new plan.	
Lack of designation of Green Infrastructure in the Rainsbrook Valley (1)	See above response in connection with NE2. The policies map in the adopted local plan identifies a ‘potential green corridor’ within the Rainsbrook Valley, but the relevance of this in decision making is not sufficiently clear. In recognition of the local feedback regarding the Rainsbrook Valley, we have commissioned further advice regarding landscape value and protection in this locality.	
No proposals made to extend PRoW. Representation refers to the Barby Lane allocation linking to the Rainsbrook Valley, Ryton Country Park linking to Ryton Pools, and Northampton Lane Byway to Cawston Greenway(1)	The development annex refers to existing PRoWs where relevant to individual sites. These have been expanded in many cases on the advice of colleagues in the Active Travel Team as set out in this report. Due to changes to site allocations, some of the specific examples cited in the comment are no longer relevant.	

Hedgerow policy is required – recognise ancient hedgerows as irreplaceable features (1)	We acknowledge and agree with the principle of protecting hedgerows. Hedgerows are protected in the UK by a number of regulations, including for example the Management of Hedgerows Regulations 2024, which it is not necessary to duplicate in planning policy. Hedgerows are legally protected if they meet certain requirements regarding length and location. They may also be considered in applying policy EN2, which refers to landscape protection, including features which contribute to the character.	
The plan should designate/account for potential Local Wildlife Sites (1)	The plan does account for Local Wildlife Sites, and potential ones as per the mapping. This mapping is provided by Warwickshire County Council. Further policy EN1 (C) seeks to resist development which would result in the loss of or harm to Local Wildlife Sites.	
No proposal for measuring, enforcing or monitoring policies (1)	Planning conditions require monitoring. BNG is a requirement against which performance must be demonstrated.	
Wildbelt policy needed to allocate land for nature recovery (1)	No further detail is included in the representation to support this statement.	
Updated Green Infrastructure Assessment needed – to look at potential wildlife sites and local wildlife corridors (1)	A sub-regional Green Infrastructure Strategy (2024) was published alongside a Warwickshire, Coventry and Solihull State of Habitats Report at Preferred Options Stage. It is outside the scope of the local plan to designate local wildlife sites.	

EN1 – Biodiversity and Geodiversity protection

- 1 specific comment of support for this policy noted
- 18 further comments attributed to this policy

EN1 Biodiversity and geodiversity protection		
Issue raised	Officer response	Proposed change (if applicable)
Criterion C(ii) too onerous and should be deleted (1)	We disagree. This aligns with national policy.	
Stronger protection of irreplaceable habitats is needed – should reference “wholly exceptional reasons” test in NPPF 193(c) (1)	Parts A and B of policy EN1 reference national policy. It does not need to duplicate the wording.	
Policy should set out that development should seek to achieve the objectives set out in the River Basin Management Plans (both Severn and Humber) wherever possible) (1)	This is addressed in Policy CL3.	
Part C should be expanded to include watercourses – no adverse impact on habitat connection. Development which introduces restricted channel flows (e.g. culvers) must not be permitted without substantial justification. (1)	Part C is about locally designated sites. Watercourses aren't locally designated sites.	
Encourage biodiversity mitigation to align with goals in the forthcoming Local Nature Recovery Strategies to meet local priorities (4)	Additional supporting text added	Additional supporting text added.
Extend EN1 to protect areas of Best and Most Versatile agricultural land (2)	We disagree. This policy is about biodiversity. This issue is covered by national policy.	
Should set criteria-based policies for the protection of designated biodiversity and geological sites. These should distinguish between international, national and local sites (1)	This is what the policy does. However, it is not necessary to repeat national policy.	
All SSSIs should be on the proposals map (1)	Agree. These should be added to the policies map.	Add SSSIs to the mapping
LWS identified in EN1 not consistent with criteria – suggests sites chosen for convenience (1)	Local Wildlife Sites are not designated through the plan-making process. Instead, these are designated by Warwickshire Country Council, based on site surveys. As the planning authority, we are responsible for responding appropriately to these constraints.	
Wildlife corridor map should be reinstated – reference to policy NE2 in the adopted local plan (3)	We have reviewed the existing policy, and do not consider that it gives clear direction in	

EN1 Biodiversity and geodiversity protection		
Issue raised	Officer response	Proposed change (if applicable)
	decision-making. On this basis, the policy is not being carried forward into the new plan.	
Emphasis on 'sites important to wildlife' is too restrictive (1)	The policy refers to designations relevant to wildlife, which the local plan is required to respond to. Policy EN4 addresses Biodiversity Net Gain.	

EN2 – Landscape protection

- 9 comments attributed to this policy

EN2 – Landscape protection		
Issue raised	Officer response	Proposed change (if applicable)
Objection as fails parts of NPPF para 16. Recommend deletion (2)	We disagree. The evidence base for the plan includes a Landscape Character Assessment of the borough, and we think it is appropriate for policies to seek to protect landscape character.	
EN2 should address landscape character which extends beyond the administrative boundary (1)	Policy EN2 is not restricted to landscapes within the borough. As part of the consideration of Special Landscape Areas, we are considering cross boundary landscape.	
Include reference to mitigation or compensation that could address harm (1)	We don't agree a need to reference this, as impact would be assessed taking account of mitigation.	
Potential to include some other considerations such as i) response to landscape character, ii) integration of landscape design from the outset, iii) or development should be landscape led (1)	We think (i) (ii) and (iii) are addressed by policy D3,	
Ecological value of landscape protection policies needs strengthening (1)	Ecological assets are addressed in EN1.	
Landscape protection policies do not include waterways – para 5.6 should explicitly refer to waterways (1)	Paragraph 5.6 sets out examples of elements that make one landscape different to another and is not designed to be an exhaustive list.	Add waterways to 5.6

EN2 – Landscape protection		
Issue raised	Officer response	Proposed change (if applicable)
	Nevertheless, waterways can be included in the list of examples.	
Welcome the policy position with reference to the setting of a heritage asset within clause C and we suggest that paragraph 5.6 could include heritage assets as an example of character. Amendment suggested. (1)	Agree.	Add to supporting text
Supporting text to be enhanced – include direct commendatory reference to Warwickshire Landscape Guidelines (1)	The Warwickshire Landscape Guidelines were published in 1993, and landscape protection policies within the adopted local plan do not refer to these. We consider that referring to guidelines of this age is not appropriate.	

EN3 – Ironstone Fringe Area of High Landscape Value

- 1 comment attributed to this policy

EN3		
Issue raised	Officer response	Proposed change (if applicable)
Ecological value of landscape protection policies needs strengthening (1)	Based on new evidence this policy has been substantially rewritten and will focus on landscape of enhanced sensitivity – focussed on the Rainsbrook Valley. The evidence report underpinning the revised policy assesses landscape ‘value’ as assessed against the Landscape Institute criteria. Natural heritage (including ecological interest) forms part of this assessment and contributes to the conclusions regarding sensitivity which underpin this revised policy.	

EN4 – Biodiversity Net Gain

- 11 comments attributed to this policy

EN4 – Biodiversity net gain		
Issue raised	Officer response	Proposed change (if applicable)
Policy overly prescriptive, contrary to EN1 and should be deleted (1)	We do not agree this is contrary to EN1, and rather seeks to set out how the requirements of legislation should be applied in the local context.	
There is no reason why BNG provided off site should be located as close as possible to the development (1)	The policy takes a sequential approach to the delivery of net gain, with the first preference being to deliver on site. We think is the desirable next step to locate BNG as close as possible to the development generating the requirement for net gain.	
The collective implications of EN4 (Ai), EN5, EN8(Ci), H7 D, W2, D3 and I2 all need to be carefully considered. (1)	In developing the emerging local plan we have and continue to consider the collective impacts of policies. Specific concerns are not identified in this comment. We do however propose additional wording to EN5 to clarify the relationship with BNG.	Add wording to EN5 re relationship with BNG
EN4 and EN5 could be merged (1)	We don't agree as we think there is justification for both. We do however propose to add wording to EN5 to clarify the relationship better.	As above
10% BNG is insufficient (2)	Minimum BNG requirements are set out in legislation (The Environment Act 2021). This policy sets out how we want to see this delivered. The council has not elected to pursue a higher than 10% requirement.	
BNG should be increased to 20% (1)	As above.	
Local Nature Recovery Strategy policy should be fully developed (1)	The Local Nature Recovery Strategy has been developed by the Warwickshire Coventry and Warwickshire Local Nature Partnership, with the responsible authority being WCC. Policy EN4 seeks to contribute to this.	
Option to mitigate for biodiversity loss off-site is unreasonable –	Policy EN4 takes a sequential approach to delivery of biodiversity	

EN4 – Biodiversity net gain		
Issue raised	Officer response	Proposed change (if applicable)
everyone is entitled to greenspace where they live (1)	net gain, which states clear preference for delivery on site. BNG is a legal requirement and should not be conflated with green open space for use by residents, which is addressed separately in policy.	
Requirement for tree planting locations. Should not be on productive farmland (1)	BNG is a requirement of development, which it is our stated preference to deliver within or adjacent to the development site. It is not suggested that this would be appropriate on productive farmland.	
Option to deliver BNG offsite is flawed (1)	Policy EN4 states preference for net gain to be delivered on site.	

EN5 – Canopy Cover

- 2 comments support the intention of EN5 specifically
- 24 additional comments on this policy

EN5 – Canopy Cover		
Issue raised	Officer response	Proposed change
Canopy cover policy risks being an undue burden that disincentivises housing delivery (6)	The policy is tested in the viability assessment. This interpretation is not supported.	
No consideration of likely impacts on development objective (1)	We don't think this will have an adverse impact on the objective.	
Policy would conflict with BNG (2)	We propose to update wording to ensure the policy is compatible with BNG	Update wording
The flexibility built into para 5.16 should be moved into the policy text (4)	We don't agree – paragraph 5.16 clearly explains that there may be circumstances where an alternative provision could be negotiated.	
Policy should be more flexible (1)	We think para 5.16 allows flexibility.	
Clarify whether it includes 'existing' and what it considers the site area to be (1)	Part C of this policy explicitly states that existing canopy should be retained first before considering new planting.	

	Given that the policy would apply to planning applications, the site area would relate to the site for which planning permission is being sought.	
The collective implications of EN4 (Ai), EN5, EN8(Ci), H7 D, W2, D3 and I2 all need to be carefully considered. (1)	See answer to same point above under EN4.	
Solar farms should be exempt from this policy (1)	Paragraph 5.16 addresses the point that it may not be possible or desirable for all developments to accommodate a 20% canopy cover. Solar farms are likely to fall into this category.	
The effectiveness of solar PV will be impacted by aspect and shading of which are factors in achieving climate resilience (CL4 Ai&ii) and EN5. A well-designed development will need to ensure both are met. (1)	We acknowledge this point. As per the officer response above, it is accepted that it will not be possible or desirable for all developments to achieve 20%.	
20% canopy cover is insufficient (2)	This policy is based on the evidence	
Suggested amendments to wording – “target” increase in canopy cover, and suggests inclusion of other green infrastructure (e.g. green roofs and walls) used to deliver equivalent benefit. Exception clause (1)	We disagree with inclusion of reference to ‘targeting’ canopy cover, as this dilutes the effectiveness of the policy. As above, we accept there will be instances where the canopy cover requirements may not be achievable, and this will be considered on a case-by-case basis. It is not considered appropriate for the policy to suggest other green infrastructure, given the objective of this policy.	
Canopy cover target should be reduced for brownfield sites (not just Rugby Town Centre) (1)	If it is considered not possible or desirable to deliver policy compliant canopy cover on any given site, paragraph 5.16 indicates that this may be negotiated. This will be considered on a case-by-case basis.	
Canopy cover would impede solar production, type of tree should be considered to avoid root spread (1)	The relationship to solar energy is addressed in responses above. The policy does not specify types of	

	trees. The site promoter would specify trees considered appropriate to the context.	
Canopy should be retained, not reduced to 20% minimum (1)	This is a misinterpretation of the policy, which seeks to increase canopy cover. Part C states that in meeting this requirement existing canopy cover should be retained first, and part B states that where a site already has canopy cover in excess of 20% prior to development, the proposal should ensure retention of at least the existing level of canopy cover.	

EN6 – Flood risk

- 5 comments attributed to this policy

EN6 Flood risk		
Issue raised	Officer response	Proposed change (if applicable)
Question need for a sequential test on all sites (1)	A sequential test has been prepared.	
Environmental policies at odds with many rural allocations – disregarded at Brinklow, Wolvey and Long Lawford allocations (1)	We think this comment relates more to the spatial strategy, but flood risk has formed part of the assessment of the emerging strategy and specific sites.	
Sequential test should be excluded from allocated sites (1)	A sequential test has been prepared.	
Policy should be substantially amended to reflect the real risks to people, property and the economy that flood risk poses (1) (see EA rep)	The representation includes further commentary, although it is not explicit how the respondent considers the policy should be amended. The commentary refers to consideration of flood risk from all sources, taking account of climate change. It describes directing development away from areas of highest flood risk, and ensuring that following the application of the sequential	

	<p>test, any development will only be permitted in areas of flood risk where the type of development is appropriate to the level of flood risk. This is set out in national policy and given effect by this policy already (parts A & B).</p> <p>The commentary continues to require protection of the functional floodplain, and ensuring that development should be set back a minimum of 8m from rivers and watercourses, which is addressed in part C of the policy.</p> <p>Sustainable drainage is addressed separately in policy D5.</p>	
<p>Increase flood zone restrictions. Minimum of 16 metres from flood zone rather than 8 metres (1)</p>	<p>This reflects the advice in the Strategic Flood Risk Assessment.</p>	

EN7 – Environmental protection and amenity

- 3 comments attributed to this policy

EN7 Environmental protection and amenity		
Issue raised	Officer response	Proposed change (if applicable)
<p>Environmental policies at odds with many rural allocations (1)</p>	<p>The overarching strategy and allocation sites have taken account of environmental constraints. The Stage 2 Site Assessment for example provides further information regarding flood risk, habitats and biodiversity. The policies in this section are intended to guide development proposals and minimise and mitigate impact on the environment.</p>	
<p>Land instability risks should be addressed more robustly (1)</p>	<p>EN7 (A) refers specifically to instability, in recognition of the potential unacceptable harm to human health.</p>	
<p>Requirement for a Preliminary Risk Assessment for planning proposals on land which is/has been subject to a land use(s) which have the</p>	<p>Land contamination is referenced within policy EN7. We will add to the supporting text of EN7 to refer to the</p>	

EN7 Environmental protection and amenity		
Issue raised	Officer response	Proposed change (if applicable)
potential to have caused contamination of the underlying soils and groundwater. This has been partially addressed in EN7 and CL3 (1)	requirement to Preliminary Risk Assessments and to 'The Environment Agency's Approach to Groundwater Protection.'	

EN8 - Air Quality

- 1 comment attributed to this policy (and other policies in this section)

EN8 Air Quality		
Issue raised	Officer response	Proposed change (if applicable)
The collective implications of EN4 (Ai), EN5, EN8(Ci), H7 D, W2, D3 and I2 all need to be carefully considered. (1)	See response under EN4.	

Housing

H1 – Housing Mix

- 10 comments attributed to this policy

H1 Housing Mix		
Issue raised	Officer response	Proposed change (if applicable)
Flexibility should be included in H1 to reflect site specific circumstances and reflect variations and localised needs within different parts of the borough. (2)	We think flexibility is built into H1 by saying that developments shall contribute to meeting the housing needs of the borough.	
Not achievable on brownfield sites. Also not monitored so risks being pointless (1)	We acknowledge that not every development site will deliver a mix as set out in the HEDNA. This is why the policy says that housing development shall <i>contribute to</i> meeting the needs of the borough.	
Suggest the 2022 HEDNA not referenced in the supporting text. Instead refer to the most recent HEDNA – delete HEDNA table (2)	The policy text (H1A) will be updated to reflect with reference to up-to-date housing needs report. Table in para 6.1 to be updated with latest evidence.	Update wording
Housing mix misses out Affordable Rent (2)	As above, policy and supporting references to be updated to reflect the latest Housing Need Report.	Update table
Rural developments often focused on larger family homes which will be unaffordable to many, larger urban estates have more scope for smaller and starter homes (1)	Housing policies H1 and H2 seek to ensure and appropriate mix of housing sizes and tenures across the borough. As above, proposals shall contribute to meeting the need across the borough and the mix on each site may vary.	
Policy should make clear that it doesn't support wholly affordable housing coming forward (1)	Affordable housing provision is addressed in policy H2. We think there may be circumstances where wholly affordable housing schemes may be appropriate, so will not seek to amend on this basis. Indeed, such a	

H1 Housing Mix		
Issue raised	Officer response	Proposed change (if applicable)
	restriction would be contrary to national policy.	
The housing mix in the HEDNA is recommended for monitoring only. Bungalows not mentioned in the policy (1)	Policy and supporting text will be updated to reflect the latest Housing Needs Report.	

H2 – Affordable Housing

- 28 comments attributed to this policy

H2 – Affordable Housing		
Issue raised	Officer response	Proposed change (if applicable)
Update to reflect golden rules (7)	Agree. We will update the policy to reflect.	Update policy to reflect golden rules.
Affordable housing requires rewording - Required general rate of affordable housing should revert to the 40% in the Core Strategy 2011. Any new housing in the Green Belt should require higher affordable housing share policies as per paragraph 67 NPPF (1)	We agree to update this policy to reflect the 'golden rules' set out in the NPPF (para 67)	Update to reflect 'golden rules'.
Request consideration of NHS staff affordable housing need (1)	Affordable housing need is assessed and evidenced in the Housing Needs Report (which updates the HEDNA information in respect of housing). This is inclusive of all groups.	
Affordable rural housing can be challenging for housing associations and tenants (1)	There is already a substantial amount of affordable housing in rural areas in the borough, and national policy supports rural affordable housing through exception sites. The supporting text of H2 recognises that there may be times where the tenure mix needs to be altered from the starting position.	
Text in para 6.5 should be included in the policy itself (1)	We do not agree that this is necessary as the supporting text is explicit and this reflects current practice.	

H2 – Affordable Housing		
Issue raised	Officer response	Proposed change (if applicable)
<p>Illogical to prescribe affordable housing tenure mix (1)</p> <p>Council should take a flexible approach to tenure split (2)</p> <p>H2 (B) reworded to reflect latest evidence on basis 2022 HEDNA may be superseded (1)</p>	<p>Paragraph 64 of the NPPF states that where a need for affordable housing is identified, planning policies should set out the type of affordable housing, including a minimum proportion of social rent.</p> <p>This policy will be updated to reflect the most up-to-date evidence in the Icen Housing Needs Report.</p>	
RSLs don't want small S106 sites (1)	Noted.	
<p>Affordable housing policies are too loose and enable avoidance with too many loopholes (1)</p> <p>Affordable housing should be mandatory and developers should not be able to avoid on grounds of cost (1)</p>	The policy sets out the expectation for affordable housing. As set out in para 6.5 however, there are some circumstances where for reasons of viability the policy compliant levels cannot be achieved.	
Affordable housing is more suitable for urban locations – higher proportional requirement should be reversed (2)	We understand the concern in this comment. However, the percentages included in the policy are based on evidence of what can be delivered. These percentages reflect the current adopted policy and the viability evidence.	
Proportions of affordable housing should be the same in rural and urban areas (1)	As above.	
Specialist older persons accommodation should be exempt from affordable housing requirements (1)	We agree. Our viability evidence supports this assertion.	Amended wording
<p>Affordable housing provision is inadequate (1)</p> <p>20% affordable housing is insufficient (2)</p>	Affordable housing policy requirement is based upon the available evidence in particular as to viability.	
Affordable housing definition is inaccurate- 20% below market rate is not logical (1)	This definition reflects national policy.	
More affordable housing for the elderly and those with disabilities – overemphasis on first time buyers (1)	Policy H6 addresses the need for specialist housing, including for older people. In addition, we have identified	

H2 – Affordable Housing		
Issue raised	Officer response	Proposed change (if applicable)
	two allocation sites (one in Brinklow and one in Wolston) for older persons accommodation. Policy H7 seeks to provide a greater proportion of accessible and adaptable dwellings which provide greater flexibility for residents with changing needs.	
Target for affordable homes too low - set at 40% (1)	The policy requirements for affordable housing are based upon the evidence base and requirements of national policy.	

H3 – Rural worker dwellings

- 3 comments attributed to this policy

H3 – Rural worker dwellings		
Issue raised	Officer response	Proposed change (if applicable)
Policies H3 and H4 not in accordance with the NPPF – reference to paragraph 73 and brownfield register (1)	Paragraph 73 of the NPPF discusses provision of small and medium sized sites, and does not relate to dwellings for rural workers specifically. This responds to paragraph 84 (a) of the NPPF.	
Better evidence of residence needed – better evidence of farm workers living there should be required (1)	The policy would require the applicant to demonstrate that there is an essential need for the worker.	
Rural worker dwellings policy undermines transport connectivity policy. No exemption should apply (1)	We disagree, and think there is a need to ensure supply to support the rural economy. This aligns with national policy.	

H4 – Rural exception sites

- 5 comments attributed to this policy

H4 – Rural exception sites		
Issue raised	Officer response	Proposed change (if applicable)
Insufficient clarity on what is classed as a 'small site'. Question justification for applying only to 'small' sites, and note that they need not be limited just to affordable housing - some market provision acceptable (2)	This wording reflects national policy which also uses the term 'small sites' . Part B of the policy indicates that some market housing provision may be justified.	
Reference to 'small site' is at odds with many allocation sizes – refers to proposed allocation at Long Lawford (1)	Allocations set out within the local plan for housing are distinct from 'rural exception sites'. Rural exception sites are not allocated and seek to provide affordable housing in locations where planning permission might not ordinarily be granted for market housing.	
Policies H3 and H4 not in accordance with the NPPF (1)	See response under H3 above. In addition, paragraph 82 of the NPPF explicitly encourages LPAs to support the provision of rural exception sites.	
Ensure community led in perpetuity (1)	Housing would be subject to affordable housing restrictions. Community-led, is how the development has come about.	

H5 – Replacement dwellings

- No comments have been attributed to this policy.

H6 – Specialist housing

- 4 comments attributed to this policy. One comment relates to a site-specific matter, rather than the policy itself.

H6 – Specialist housing		
Issue raised	Officer response	Proposed change (if applicable)
H6 (C) in respect of Brinklow site and development requirements bullet points 2 and 3 of development requirements for site 315 should be reconsidered (1)	See above response in S6.	
Housing for older people won't come forward unless it is allocated (1)	Noted. We are proposing that sites in Brinklow and Wolston will deliver accommodation for over 65s in the Regulation 19 plan. Reference to be included in the supporting text for this policy and in the annex for 'development principles'.	Add reference in the supporting text to sites intended for older persons accommodation.
Specialist housing policy is too weak and unsupported - Need of 6.5% of all dwellings as specialist homes for older people is insufficient and there is no policy to support its implementation (1)	As above, we propose to identify two sites for older person's accommodation within the Regulation 19 plan, plus it is envisaged that this type of accommodation will come forward on large strategic sites in addition to other types of housing. Supporting text in paras 6.18-6.21 to be updated to reflect the latest housing needs report.	
No reference to children's care homes within specialist housing requirements (1)	We do not have evidence to support inclusion within this policy.	

H7 - Housing Standards

- 17 comments attributed to this policy

H7 – Housing Standards		
Issue raised	Officer response	Proposed change (if applicable)
Blanket application of NDSS is inappropriate and will create viability issues, undermining housing delivery (1)	We think it is important to set minimum space standards based on the evidence. Viability modelling has been carried out with this policy requirement included.	

H7 – Housing Standards		
Issue raised	Officer response	Proposed change (if applicable)
Requirement for category M4(2) not necessary (1) No clear justification for application of M4(2) (1)	We disagree. The Regulation 18 plan cited the evidence base (HEDNA), which has since been updated with a new Housing Needs Report.	
Comfortable with M4(2). Recommend reducing M4(3) proportion is reduced to 5% (1)	The proportion of the M4(3) requirement is being amended (reduced) in line with the latest Housing Needs Report.	
Category 3 housing shouldn't be required unless local evidence (1)	Local evidence is cited in the supporting text for this policy, and the updated Housing Needs Report now replaces this, as above.	
The collective implications of EN4 (Ai), EN5, EN8(Ci), H7 D, W2, D3 and I2 all need to be carefully considered. (1)	As above in response to EN4. Viability of the local plan as a whole is being undertaken.	
Object to minimum garden sizes (1) NDSS are strict enough. Standards for outdoor space too restrictive (1) Have H7 standards for outdoor amenity space been tested against all typologies (3)	We consider there is a case for setting minimum garden sizes given the importance of green space to the wellbeing of residents.	
D & E of policy are too onerous (1)	We consider there is a case for setting minimum garden sizes	
Rewording suggested – all dwellings to meet nationally described space standards, seek to maximise the number of accessible dwellings provided taking account of site specific considerations (1)	We disagree with the proposed loosening of the wording. The policy has however been amended in line with the latest Housing Needs Report (see above).	
Suggest strengthening policy to ensure decent garden size is maintained and restrict infill development on existing gardens (1)	We don't think this is required in the context of this policy. Garden development (on existing gardens) would be considered in the context of other relevant policies in the plan, and decided on a case-by-case basis.	

H7 – Housing Standards		
Issue raised	Officer response	Proposed change (if applicable)
Private gardens should be minimum 6 times the footprint of the house (1)	We do not agree that this would be a realistic requirement.	
All new residential developments should have bicycle storage and infrastructure (1)	Agreed. Cycle parking standards are included in an appendix (with vehicle parking standards), and referenced in policy I2.	
Housing standards should include hedgehog friendly fences as mandatory. Swift boxes to be recommended (1)	The housing standards in this policy focus upon the space and requirements of the occupants. We therefore don't think this is the right place to add the requirements suggested.	

H8 – Houses in multiple occupation

- 3 comments attributed to this policy

H8 - HMOs		
Issue raised	Officer response	Proposed change (if applicable)
Add clear standards – 93% of respondents at Issues and Options Consultation supported introducing clearer standards for HMOs but this is not reflected. (1)	It is correct that there was substantial support for clearer standards for HMOs. Whilst we have not incorporated them into a single policy as envisaged at Issues and Options stage, parking standards for HMOs are introduced in the parking standards appendix, and space standards are included in policy H7. These were explicitly identified in the question posed at Issues and Options stage and featured most in the feedback comments.	
Old terraced houses should be prevented from conversion (1)	It is not possible to include such a restrictive policy, and some conversions would comprise 'permitted development' (i.e. would not require the submission of a planning application for approval). The now implemented Article 4 Direction in central Rugby has however removed deemed planning consent for conversions to HMOs so	

H8 - HMOs		
Issue raised	Officer response	Proposed change (if applicable)
	planning applications would be required.	
Absolute number of HMOs within a given radius should also be limited (1)	We disagree, and think that the proposed proportionate policy approach is preferable.	

Wellbeing

General comments

- 2 general comments on this policy section

Wellbeing general		
Issue raised	Officer response	Proposed change (if applicable)
Recommend the inclusion of a comprehensive policy on health and wellbeing, and invite the Council to engage with the NHS on its development (1)	We have sought to incorporate health and wellbeing throughout the strategy and policies of the plan, rather than a single policy.	
Support use of Health Impact Assessments, and would like to work proactively with the Council on a Health Impact SPD (1)	We have not carried forward a policy on Health Impact Assessments (HIAs). Feedback from development management colleagues and our experience is that HIAs add to the volume of material submitted with planning applications but do not meaningfully impact on outcomes. Often they are retrospective rationalisations for decisions already made. Instead, we have sought to incorporate health and wellbeing throughout the strategy and policies of the plan.	

W1 – Protection of community facilities

- A very large volume of representations was received in respect of Brandon Stadium from individuals. Brandon Stadium is specifically discussed under part B of this policy. 22 individual respondents were opposed to this part of the policy. 1530 responses were received in support of this part of the policy. These are summarised in appendix 11.
- 6 comments raised below relate to the policy more generally
- Comments relating to Brandon Stadium below have been received from organisations or site promoters.

W1 – Protection of community facilities		
Issue raised	Officer response	Proposed change (if applicable)
Do not consider this policy approach effective in its current form – want to clarify if health facilities are included (1)	The community facilities addressed by this policy are set out in paragraph 7.1, and do not include health facilities.	

Object to the inclusion of indoor and outdoor sports facilities (some of which includes playing field land) - request reference deleted. Consider conflicts with W2 (1)	We think this refers to the inclusion of facilities in para 7.2.	
NPPF policy 104 rather than 98 should be applied to policy – argue Brandon Stadium is not a community facility (1)	Para 88c) NPPF specifically lists sports venues as community facilities while para 98 refers to recreational facilities. There is no conflict with national policy.	Additional text added to Policy W2 to clarify relationship with Policy W1
Policy should make reference to Dunchurch Pools Marina (1)	Dunchurch Pools Marina does not fall within the typologies identified in paragraph 7.1.	
A(i) principles incompatible with development at site 122 (1)	Noted. Site 122 will not be a site allocation in the proposed Submission Plan (see reference to this site under S6).	
Pubs should not be protected after becoming unviable (1)	The policy does not protect uses that are demonstrated to be unviable. Local communities can however seek to register local facilities as ‘Assets of Community Value’.	
Request clarification that tree planting won't inhibit ability or flexibility to mark out playing pitches(1)	This comment may refer to requirements of EN5 (canopy cover). We do not envisage conflict with an ability to mark out playing pitches. Any conflicts would be considered on a site-by-site basis.	
Support for the policy because of the contribution Coventry Stadium makes to the heritage and cultural life of Coventry. (2)	Noted.	
Introduction of a time limit recommended for restoration of Coventry stadium (1)	We disagree that a time limit is appropriate.	

W2 – Open space and sports provision

- 10 comments are attributed to this policy.

W2 – Open space and sports provision		
Issue raised	Officer response	Proposed change (if applicable)
Query whether open space standards for playing pitches relate to the	The standards are derived from the Sport England Playing	

<p>PPOSS? and note that team generation numbers are not static and dialogue on this welcomed. (1)</p> <p>Note there is no provision for indoor sport provision contributions (1)</p>	<p>Pitch Calculator for Rugby. See published explanatory note.</p>	
<p>Criterion C should be broadened to allow off site contributions (2)</p>	<p>We think criterion C already allows for this by saying on site provision is preferred, but where off site provision is justified, how this would be calculated.</p>	
<p>The collective implications of EN4 (Ai), EN5, EN8(Ci), H7 D, W2, D3 and I2 all need to be carefully considered. (1)</p>	<p>See response under EN4.</p>	
<p>Policy should set out criteria against which loss of open space and sports facilities should be considered - align with NPPF para 104 (1)</p>	<p>Paragraph 104 of the NPPF sets out these criteria. Local policy should not duplicate national policy.</p>	
<p>Definition of park has become looser since previous plan (1)</p>	<p>We don't agree. Parks and recreation grounds is defined in the glossary. Further information in the response below.</p>	
<p>Confusing use of both 'parks and recreation grounds' and 'parks and gardens' - Green Space Strategy definition is preferred (1)</p>	<p>The typology adopted in the emerging local plan is 'parks & recreation grounds' rather than 'parks & gardens'. The definition of the former is more expansive than the latter, which means that there are more 'parks & recreation grounds' recorded in the new open space study than there were 'parks & gardens' in the prior study. It is recognized that sites within typologies may vary considerably and this is captured by site specific assessments of quality and value</p>	
<p>Add in rural sports pitches and playing fields (1)</p>	<p>Policy W2 addresses all provision associated with new development regardless of whether in a rural or urban context.</p>	
<p>Offsite mitigation for open space and sports provision should require substantially higher contributions (1)</p>	<p>No evidence has been put forward to support this assertion or indicate a scale of</p>	

	contribution. It may not be practicable to provide open space on every site and setting off site contributions at a punitive level would not accord with the CIL Regulations.	
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Design

General comments

- One respondent (Chamber of Commerce) cites concern that policies in this section may affect the viability of small-scale developments that seek to provide lower cost premises for smaller businesses (in addition to policies in the climate section).
- Renewables should be exempt from design policies (1)
- Majority of design guidelines are not followed or realised by developers on new builds, they need to be enforced more (1)
- 5 comments of support for policies within this section were received

General comments		
Issue raised	Officer response	Proposed change (if applicable)
"Wolvey village expansion design code" document not available during consultation (1)	Given the scale of growth proposed at Regulation 18 stage, it was considered that a design code for the village would be beneficial. The scale of development is reduced at Reg 19 and so this is no longer listed as a requirement. Design codes should be developed with the local community (see National Model Design Code) and this would be prepared later if needed.	
Strengthening of design guidelines needed – too easy for developers to maximise profit at the expense of good layout and design (1)	This is what the policies in the ‘design’ section are seeking to achieve.	

D1 – Well-designed places

- 1 comment of support attributed to this policy

D1 – Well-designed places		
Issue raised	Officer response	Proposed change (if applicable)
Consider that policy should be made clearer with regard to local character, the historic built environment, and landscape settings for development. Support design codes and design guides (1)	We think that local character and the historic built environment are specifically addressed in Part Bii of this policy. Landscape setting (existing) is addressed in the ‘environment’ chapter, and	

	integration of landscape is addressed in D3.	
Ensure house designs are in keeping with area (1)	Part Bi of the policy requires appropriate response to built form. We think this strikes a balance between responding to the built characteristics and not stifling more contemporary architectural responses.	

D2 – Infill and householder development

- No comments are attributed to this policy

D3 – Landscaping

- 21 comments attributed to this policy

D3 – Landscaping		
Issue raised	Officer response	Proposed change (if applicable)
The collective implications of EN4 (Ai), EN5, EN8(Ci), H7 D, W2, D3 and I2 all need to be carefully considered. (1)	See response under EN4	
Potential to include some other considerations such as i) response to landscape character, ii) integration of landscape design from the outset, iii) or development should be landscape led (1)	This policy should be read in conjunction with EN2 and EN3 (PO version) in respect of landscape character, but accept that reference to landscape character could be included in this policy. Integration of landscape and being landscape led, can also be reinforced.	Include reference to being landscape led/landscape integrated from the outset. Also add reference to landscape character.
Whilst native planting is preferable, it isn't always appropriate to use native species. Suggest amend wording (1)	We acknowledge this point, and it reflects recent experience in specifying appropriate planting in the SW Rugby Design Code – especially street trees. Amend Part D on this basis so that whilst planting should be predominantly native, it need not be exclusively so.	Insert 'predominantly' before the word native in para D.
Protection for native trees should be included as in current local plan policy (16)	Policy SDC2 in the adopted local plan requires new planting to comprise of native species, which is what	As above

	is assumed to be meant by this feedback. This was also drafted into part D of policy D3. However, on the basis of the above comment, and recent planning experiences particularly around street trees, we propose to amend part D to require 'predominantly native' planting.	
Proposed rewriting to strengthen and retain previous policy – use of robust landscape materials, and native planting (1)	With reference to the detail behind this summary, this refers to native species and ecological value of species. The officer response to native species is set out above. We do not propose further amends with reference to ecology, which is addressed in other policies.	
Design policy should be more specific – principles should be clear if requirements. Refers to greener, climate resilience, and wellbeing benefits (1)	The matters referenced are cited as benefits of positive landscape design in the supporting text (para 8.8). These should naturally result from positive implementation of this policy.	

D4 – Historic Environment

- 3 comments attributed to this policy

D4 – Historic environment		
Issue raised	Officer response	Proposed change (if applicable)
Concerned policy D4 only relates to the borough's heritage assets (1)	We acknowledge the point that development within Rugby Borough may impact heritage assets in neighbouring areas, and will amend the text to reflect this.	Amend Part B so that it can apply to assets beyond the administrative boundary.
Make clear that this policy refers to both designated and non-designated heritage assets. Also suggest that clauses A and B should be amended to refer to the setting of a heritage asset, such that the first sentence of clause C is amended to	We acknowledge that the supporting text could be more explicit regarding designated and non-designated heritage assets.	Amend A, B and C to refer to setting.

add after heritage asset: "including and contribution made by its setting". (1)	Agree to amend A, B and C to refer to setting.	
Clause C refers to 'historic building reports'. Suggest this should instead be 'Heritage Impact Assessments' (1)	Agree.	Amend clause C to refer to Heritage Impact Assessments.

D5 – Sustainable Drainage

- 1 comment of support attributed specifically to this policy
- 5 further comments attributed to this policy shown below

D5 – Sustainable drainage		
Issue raised	Officer response	Proposed change (if applicable)
Encourage clean roof run-off to be directed away from the sewer system and into SUDs (1)	We will amend Part A to include this	Amend Part A
SuDS need to meet 'Groundwater protection position statements'(1)	Add to para 8.17	Add to paragraph 8.17
Sustainable builds must always be well outside flood plain (1)	Noted.	
Recommend policy wording to include regarding drainage hierarchy (1)	We have not included this as a new policy. We do not consider it necessary.	
Suggested wording : <i>All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate. All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity. Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.</i> Supporting text - see rep (1)	We acknowledge this suggested policy wording, though we are content that the draft policy addresses all the same points.	

Infrastructure

General comments

- 8 general comments noted relating to these policies

General comments	
Issue raised	Officer response
Sites should only be considered once necessary infrastructure has been confirmed to be possible/in place (1)	Development and associated infrastructure need to be planned together.
Request policy inclusion explicitly recognising policing infrastructure as a category of community infrastructure + request liaison regarding capital requirements through S106 and CIL (1)	We have not received requests for contributions for policing infrastructure. It is not clear that this would meet the CIL 122 test.
Do not expect delivery of physical space to be the whole solution to meeting primary care needs (1)	Noted.
Public transport connections to GP provision should be fully considered (1)	We are not proposing new GP provision except on the large SUEs, where public transport is being considered.
Some infrastructure contingent on national infrastructure providers. Detailed requirements in an Infrastructure Development Schedule or similar (1)	Noted. An Infrastructure Delivery Plan will be developed.
Council tax is increasing but no improvements in amenities or infrastructure (1)	This is not related to infrastructure required to mitigate development.
Data indicates fall in demand for school places (1)	Noted. Pupil data drawing on birth rates etc is factored into the school place modelling we have undertaken.
Claims that developers will provide infrastructure needed are baseless (1)	Infrastructure provision linked to development has to be demonstrably to mitigate the impact of the development and not to address existing concerns.

I1 – Transport

- 1 comment of support attributed specifically to this policy
- 6 comments attributed to this policy.

I1 – Transport		
Issue raised	Officer response	Proposed change (if applicable)
Don't support blanket prohibition on cul-de-sacs (1)	As the policy sets out, we think it is important for a connected network of streets and routes which prioritise active travel.	

	Cul de sacs are not optimal in achieving this. The policy still allows non-through roads with modal filters.	
Horse riding should be explicitly supported as active travel. (1)	Noted. We will add reference to inclusion of horse riding within the supporting text (para 9.1)	Add horse riding to para 9.1
Lack of equal support for cycling provision as pedestrian routes – should make provision for safe cycling (1)	This policy seeks to prioritise active travel including walking and cycling. We think this is clear in the draft policy, though acknowledge that cycling should be added to Bvi	Add cycling to Bvi
Suggestion for bus exchange and further development on the north side of the train station (1)	Noted.	
No meaningful cycle lane provision (1)	Warwickshire County Council has a Local Walking and Cycling Infrastructure Plan (LCWIP) which the local plan is seeking to support through development requirements on site allocations.	
Encouragement of active travel and use of public transport undermined by privatisation of bus services (1)	This matter is beyond the scope of the local plan.	

I2 – Parking

- 12 comments attributed to this policy

I2 – Parking		
Issue raised	Officer response	Proposed change (if applicable)
Suggest parking figure should be tested to ensure it doesn't prevent some house types being delivered e.g. 2-bed terrace (2)	The parking standards broadly reflect existing standards within the adopted local plan (albeit proposed revisions to cycle parking to align with LTN1/20 as outlined below). They are also not designed to be wholly prescriptive, with under or over provision permissible with appropriate evidence (see appendix 1).	
Bicycle parking shouldn't be required for specialist older persons' accommodation (1)	A respondent below has recommended revision of cycle parking standards in line with LTN1/20. This will amend the requirement for specialist older persons' accommodation.	

I2 – Parking		
Issue raised	Officer response	Proposed change (if applicable)
The collective implications of EN4 (Ai), EN5, EN8(Ci), H7 D, W2, D3 and I2 all need to be carefully considered. (1)	See response under E4.	
The inclusion of provision for parking of vehicles is at odds with active travel elements (1)	Whilst we are keen that policies prioritise active travel and opportunities to travel via active and sustainable means, we recognise that car ownership is likely to remain, and appropriate parking provision is required.	
Change word 'adequate' in I2 (A) – amend to 'appropriate and secure' (1 - WCC)	Agree.	Substitute word 'adequate' for 'appropriate and secure'.
Specify a distance for cycle parking from entrances? Add information re e-charging, add in notes about non-allocated residential parking? (1)	This may be subject to future supplementary guidance but is considered too much detail for the local plan.	
Cycle parking standards should be updated in line with LTN1/20 (specifically Table 11-1) (1)	Agree to compare proposed standards with LTN1/20 and amend as appropriate.	Amend residential (except elderly care) to 1 space per bedroom Amend dwellings for elderly persons
Recommend the same level of detail on types of stands and typical layouts as Warwick District's Parking Standards SPD (1)	We recognise the benefits of this suggestion but consider this too much detail for the local plan. We may explore production of an SPD to address this matter.	
Clarify what is meant by gross floorspace area - GIA or GEA (appendix 1) (1)	This should refer to Gross Internal Area (GIA)	Amend reference to GIA
Zero parking requirements should be acceptable in highly accessible areas (1)	Zero parking may be acceptable in some cases, subject to provision of appropriate evidence. Appendix 1 would allow for this.	
Parking space requirements should be increased – one bed should have 2 spaces minimum (1)	As set out in the appendix, the parking standards are a starting point, and higher or lower provision may be justified.	

I3 – Communications Infrastructure

- A single comment is attributed to this policy

I3 – Communications infrastructure		
Issue raised	Officer response	Proposed change (if applicable)
Broadband and mobile communications infrastructure are essential utilities – amended policy wording suggested. (1)	Broadband provision is not within the gift of a local plan. We don't propose to amend the wording on this basis.	

I4 – Infrastructure and planning obligations

- 10 individual comments are attributed to this policy.

I4 – Infrastructure and planning obligations		
Issue raised	Officer response	Proposed change (if applicable)
Welcome recognition of health infrastructure. Emphasise need for effective implementation mechanisms. Recommend that the local plan have a specific section in the document that sets out the process to establish the appropriate form of developer contributions to health infrastructure (1 – NHS Property)	We cannot justify a formula-based approach to calculating contributions as this is not CIL compliant.	
Criterion C should set out the trigger for post planning permission viability reviews, and criterion D needs greater flexibility as there are limitations for non-strategic residential developments to offer ongoing employment post construction (1)	Triggers will be defined on a case-by-case basis. We do not agree that criterion D requires greater flexibility.	
I4(b) unsound – should not require retrospective contributions (1)	We disagree. This was requested by our legal team.	
There are other proposed allocations that should contribute to the south west Rugby infrastructure package – refers to sites 90 and 341. Safeguarded land should contribute to Appendix K highways, active travel and public transport infrastructure (2)	Noted, though it is envisaged that sites 90 and 341 will be deleted prior to Regulation 19 consultation.	

I4 – Infrastructure and planning obligations		
Issue raised	Officer response	Proposed change (if applicable)
Policy should explain how developers need to satisfy criteria D (1)	An employment and skills plan will be a matter for supplementary guidance.	
Secondary education contributions from schemes proximate to SW Rugby should be directed to the SW Rugby school not St Thomas Cross (1)	No school will now be proposed at St Thomas Cross (see I6).	
Review mechanism should only apply to multi-phase sites (1)	We disagree.	
Mitigation of affordable housing or infrastructure not acceptable (1)	We understand this comment to oppose non-delivery of a policy compliant minimum affordable housing quantum or infrastructure. We recognise that the priority is to deliver affordable housing and infrastructure but consider it necessary to include mitigations for where these cannot be delivered for viability reasons. These will be considered on a case-by-case basis.	
No evidence supplied among supporting evidence documents for infrastructure (1)	Policy I4 addresses infrastructure generally. An infrastructure schedule will be published at Regulation 19 stage.	

I5 – New railway stations

- 7 individual comments have been attributed to this policy.

I5 – New railway stations		
Issues raised	Officer response	Proposed change (if applicable)
Request that potential wider benefits of the Rugby Parkway Station are recognised beyond the borough boundary (1)	This policy acknowledges the anticipated delivery of the Rugby Parkway Station. We acknowledge that its delivery will bring benefits within the borough and beyond, albeit this is not explicit in this policy, nor does it need to be.	

I5 – New railway stations		
Issues raised	Officer response	Proposed change (if applicable)
Request land south of the A5 is safeguarded to support the development of the Nuneaton Parkway Station. Annex with further detail included in the rep. (1)	Policy I6 does safeguard land for the Nuneaton Parkway Station.	
Relevance of Nuneaton Parkway and Rugby Parkway stations should be made clear (1)	These are planned stations which would offer improved access to rail as a sustainable mode of travel.	
Disagree with safeguarded land for Rugby Parkway – Rugby does not need another station, and will increase traffic in this area (2)	We disagree. Rail travel is an important public transport option, and the location of Rugby Parkway seeks to be accessible by active travel from within Houlton and other nearby areas.	
Park and ride scheme should be explored instead of the new Rugby Parkway train station (1)	We disagree. The parkway station seeks to provide sustainable travel for journeys further afield and not access to the town centre.	
Parking spaces at Rugby Parkway to be increased – 500 spaces, 400 with EV charging required (1)	Policy I5 seeks to safeguard land for the Nuneaton Parkway f the new Rugby Parkway Stations. Parking is a detailed matter beyond the scope of this policy.	

I6 – Secondary education

- 22 comments have been attributed to this policy
- 124 individual comments against the proposed school site were received as part of representations on site 59

I6 – Secondary education		
Issue raised	Officer response	Proposed change (if applicable)
Deliverability of new secondary school – viability (1)	A new secondary school allocation will not be taken forward.	
If intention is that all development should contribute to the school, this should be done through CIL (1)	It is no longer proposed that a new secondary school allocation will be included.	
Further residential growth should be apportioned to Rugby. Linked to delivery of secondary school (1)	See response to this issue under S2.	

	The position on secondary education provision has evolved since the Preferred Option. A new secondary school will no longer be proposed.	
To be robustly evidenced to ensure contributions are appropriate (1)	As above, further testing has been ongoing. Evidence and amendments to be reflected in the Regulation 19 Plan.	
Unreasonable for Wolvey-based development to contribute to the new St Thomas Cross 6FE secondary school (1)	A new school allocation at St Thomas Cross will no longer be taken forward.	
St Thomas Cross site is unsuitable for a secondary school (14)	This site will no longer be an allocation for a secondary school.	
Should make clear that SW Rugby development won't need to contribute to secondary school provision elsewhere (1)	A new school allocation at St Thomas Cross will no longer be taken forward.	
Proposed new school site is poorly positioned for new developments to the west of Rugby (1)	This was the only site available for us to consider for a school. Following the Preferred Option consultation, further modelling of school places and liaison with the Local Education Authority has revealed that there is an insufficient anticipated shortfall of students to warrant and entirely new secondary school in this area. It is therefore proposed that this will not be retained as an allocation for a school, with places instead being generated through expansion of existing secondary schools including Avon Valley.	
Secondary school provision in SW Rugby is not referenced (1)	The requirement for a 6 FE secondary school at South West Rugby is included in policy S8 (Ci). It is also included in a planning application under consideration at the time of writing.	

Summary of outcome – I6

- Policy I6 will not be included in the proposed Submission Plan.

Omission sites

Within this section, only omission sites which have attracted feedback through the consultation are addressed.

Residential omission sites

Site 73 - Lodge Farm

Summary of community feedback

- **240** representations were made by individuals referring to this omission site
- A further **2069** hard-copy letters were received from ‘Stand against Lodge Farm’ and **469** hard copy letters from Action for Dunchurch

It is observed that an allocation was included in this location at Regulation 19 (Submission Plan) stage of plan-making in the last local plan process and was subsequently deleted at Examination in Public. It is thought that this explains the very high number of representations referring to this omission site.

The most frequently recurring comments are summarised below. A further detailed summary is included in appendix 12.

Recurring issue raised	Officer response
Lack of change in circumstances or mitigation proposals since 2019 – refers to Examiners conclusions in the last local plan.	We have assessed the site submission for Lodge Farm in the same way as all other sites for this plan-making process, and in relation to the current context. The Stage 2 Site Assessment notes changes within the proposal since that time. This site will not be allocated in the emerging plan.
Significant impacts on traffic and road safety as well as increased air pollution	The Strategic Transport Assessment (STA) has modelled the inclusion of Lodge Farm as a reasonable alternative. It concludes that a significant amount of highways mitigation would be required, with likely development viability concerns. Furthermore, it concludes it is undesirable to increase traffic flows to Dunchurch crossroads given existing capacity issues. This is part of the reason we do not propose to include this site as an allocation.
Devastating environmental and landscape impact, exacerbated since 2019 by increased scale	The stage 2 site assessment notes the site as medium landscape sensitivity. It also concludes it is not within an impact risk zone for a SSSI or local wildlife site.
Lack of short-term deliverability and risk of overdependence	The ‘strategy’ section addresses this matter. Delivery is part of the rationale for the spatial strategy of selecting a range of small and medium sized sites rather than another large urban extension or new settlement.

Recurring issue raised	Officer response
Unsustainable, isolated location with lack of potential to promote active travel or reduce use of the private car	The Stage 2 Site Assessment notes the site's current poor accessibility for non-car modes, and likely mitigation requirements for the highway network are noted above.
Increase in run off and surface water flood risk	Flood risk is addressed within the evidence base – Strategic Flood Risk Assessment. The Stage 2 Site Assessments notes surface water flood constraints as low.
Lack of need for such a large housing estate in Rugby	The evidenced need for housing over the plan period is addressed under the 'strategy' section.
Lack of on-site infrastructure	It is not the case that no infrastructure would be provided on site. The stage 2 site assessment notes the potential inclusion of a secondary school, two primary schools, a local centre and substantial open space.
Goes against the dispersal strategy which is preferable	The spatial strategy seeks to disperse some of the additional housing need for the plan period, though we do not consider this an outright dispersal strategy given the existing large strategic sites being delivered at Houlton and South West Rugby.
Risk to affordable homes provision	The infrastructure requirements of large strategic sites, and their associated costs, have resulted in lower affordable housing provision on existing sites. This forms part of the rationale for the proposed spatial strategy where smaller sites with lower onsite infrastructure requirements are anticipated to deliver higher levels of affordable housing.
Lack of guarantee for mitigation proposals Impacts on nearby wildlife sites – Draycote Meadows SSSI referenced.	This site is not proposed for allocation.
Impact on habitats, priority and protected species, fragmentation of ecological corridors	This site is not proposed for allocation.
Examples of similar sites being rejected in other parts of the country	Noted. This site is being considered on its own merits in the context of the evidence.
Harm to heritage assets – ridge and furrow, medieval village remains and Oxford Canal conservation area referenced.	This site is not proposed for allocation.
Use of a greenfield site and farmland	The site is green field but not within the green belt as noted
Reintroducing the site undermines consultation process – has not undergone same processes as preferred option sites	It is not proposed that this site will be introduced as an allocation.
No evidence proposed mitigations will work	This site is not proposed for allocation.

Recurring issue raised	Officer response
Lack of primary care provision if no surgery opens on site – note constraints at Dunchurch GP surgery	This site is not proposed for allocation.
Separation by at A45 is inappropriate for a settlement	We have indicated a preference for a bypass around any new settlement. However, this site is not included as an allocation.
Impact on Dunchurch Pools Marina employment and tourism asset	This site is not proposed for allocation.
Negative impact on the historic environment of the Upper Leam Valley	This site is not proposed for allocation.
Delivery delays at Rugby town sites wouldn't necessarily apply to Lodge Farm – Lodge Farm would not be an urban extension (1)*	Noted. Lodge Farm is a 'reasonable alternative' site as outlined in the SA. Reasonable alternatives are tested further through the evidence base.
Lodge Farm has the potential to provide new infrastructure to the benefit of new residents and Dunchurch. Cosford would be in close proximity to Rugby (1 WCC)*	We recognise this point, which is why both Lodge Farm and Cosford are considered as 'reasonable' alternatives' in the Sustainability Appraisal. However, the Viability Study demonstrates that the challenges of viably delivering new infrastructure in these locations.
Lodge Farm (site 73) would be WCC's preferred site (1 WCC)*	Noted. Lodge Farm has continued to be assessed as a 'reasonable alternative' but has not been included as an allocation for reasons set out in the evidence base, including highways impacts and viability challenges.
Lodge Farm should be deleted as a reasonable alternative (1)*	Lodge Farm has been carefully assessed. The final Sustainability Appraisal report considers whether it should remain in reasonable alternative growth scenarios assessed therein.
Inclusion of Lodge Farm as a 'reasonable alternative' is a breach of res judicata – disregards previous inspector's findings (1)*	Lodge Farm was not included as an allocation in the Local Plan 2011-2031, but we think it was appropriate and necessary to consider it as part of the preparation of the new plan.

*N.b. these comments are repeated from the summary relating to policy S2 for completeness.

Site 83 - Land south of Lilbourne Road, Clifton-upon-Dunsmore

- 1 comment attributed to this site (below). This comment is also included on the 'Clifton-upon-Dunsmore' summary in the appendix relating to policy S6.

Issue raised	Officer response
Concern for future development which would be unsustainable – 180 homes on unallocated site	Noted. It is understood that this comment relates to a live planning application submitted in respect of this site, which was an omission site at Regulation 18.

Site 114 - Land at M6 Junction 1 (Cosford)

Issue raised	Officer response
Scale of development is inappropriate for Green Belt	Evidence relating to green belt will be published at Regulation 19 stage.
Close to an already dense urban area – preference for Lodge Farm (site 73)	Noted.
Industrial estates would be at the centre of the proposal	It is acknowledged that the site area would wrap around existing employment uses.
Cosford is a suitable proposal – benefits noted as proximity to motorway, train station, schools and retail park.	Noted.
Potential for increased flooding	The Stage 2 Site Assessment notes the River Swift flood plain and the north east of the site being within flood zones 2 and 3. Further information in the Strategic Flood Risk Assessment.
Site to North West of Rugby which was discounted but shouldn't have been – argues for a different access to that described in the Wolvey public consultation event which is less susceptible to flooding. (1)	Noted. This site remains an omission based on assessment of the evidence base.
Lodge Farm has the potential to provide new infrastructure to the benefit of new residents and Dunchurch. Cosford would be in close proximity to Rugby (1 WCC)*	We recognise this point, which is why both Lodge Farm and Cosford are considered as 'reasonable' alternatives' in the Sustainability Appraisal. However the Viability Study demonstrates that the challenges of viably delivering new infrastructure in these locations.
Land at Cosford (site 114) would attract objection from WCC on the basis of minerals. (WCC)**	Noted.
Cosford not sustainable (1)**	Noted.

*N.b. this comment is duplicated from the section relating to policy S2 for completeness

** N.b. this comment has been copied from the 'Evidence Critiques' appendix for completeness.

Site 238 (or smaller 335) - Land off Rugby Road, Clifton-upon-Dunsmore

Issue raised	Officer response
Alternative site should have been taken forward. Alternative road options for different scales of development and lower grade farmland	The larger site (i.e. 700 homes) was not taken forward from Stage 2 as set out in the report due to landscape sensitivity. A smaller site for 150 was considered, but not included as an allocation.

Scale of the larger strategic site proposal is too large for a small settlement	Noted.
Site is mainly arable land – grazing fields in other locations	Noted. The Stage 2 Site Assessment notes significant loss of BMV agricultural land.
Site is a key habitat site	The Stage 2 Site assessment notes limited ecological constraints.
Site is somewhat removed from the village encouraging use of private vehicles	Noted. This site remains an omission site.
Sites 129, 202 and 307 not justified as an appropriate strategy with regard to reasonable alternatives. Consider site 238/335 more suitable, having regard to the SA (SP- Richborough)*	See stage 2 site assessment and Sustainability Appraisal report.

*N.B this comment summary is repeated from S6 as it refers to this omission site.

Employment omission sites

Thurlaston

- 41 individual respondents have referred to omission sites 18, 77 and 133 at Thurlaston
- Thurlaston Parish Council's comments are included in this summary

All community comments attributed to the omission sites at Thurlaston are captured below. No additional summary is included in the appendices therefore.

Site 18, Barnwell Farm, Thurlaston

Summary of community feedback

Recurring issue raised	Officer response
Unreasonable to harm Thurlaston to meet Coventry's unmet need	The local plan strategy seeks to meet Rugby Borough's employment needs. Whilst there is an identified unmet local employment need in Coventry City's emerging local plan, it has never been the stated position of the Council that it is seeking to allocate land for this purpose. Furthermore, this site has not been proposed as an allocation.
Access through Thurlaston and limited transport provision	The Stage 2 site assessment notes access would likely be from a new roundabout junction off the Coventry Road, and this should be modelled. A low PTAL rating is noted. Site is considered in the Strategic Transport Assessment.
Major impact on landscape and rural character	The landscape sensitivity of this site is assessed as low in the Stage 2 Site Assessment. A separation area is proposed to be designated at Thurlaston and that is

Recurring issue raised	Officer response
	part of the rationale for not allocating the site.
Residents already have to drive through an industrial estate to access the village	It is understood that this comment refers to the built development at Symmetry Park, which forms part of South West Rugby.

Site 77 - Land west of Symmetry Park

Summary of community feedback

Recurring issue raised	Officer response
Harm to the landscape and rural setting	The Stage 2 site assessment identifies low landscape sensitivity on this site, noting it comprises arable land with poor sense of enclosure. A separation area is proposed to be designated at Thurlaston and that is part of the rationale for not allocating the site.
Major impact on landscape and rural character	A separation area is proposed to be designated at Thurlaston and that is part of the rationale for not allocating the site.
Lack of transport access and increase in road congestion	Access and transport are addressed at a high level within the Stage 2 Site Assessment, which also notes that highway infrastructure associated with South West Rugby could reduce congestion.
Unreasonable to harm Thurlaston to meet Coventry's unmet need	As per response to same comment for site 18.
Green Belt location	The stage 2 site assessment notes the green belt designation, and potential contribution to at least one of the purposes. A green belt contribution assessment will be published at Regulation 19 stage.
Proximity to SSSI	This is noted as a constraint in the Stage 2 Site Assessment.
Residents already have to drive through an industrial estate to access the village – too many warehouses locally creating noise and light pollution.	It is understood that this comment refers to the built development at Symmetry Park, which forms part of South West Rugby.

Site 133 - Land north of M45

Summary of community feedback

Recurring issue raised	Officer response
Unreasonable to harm Thurlaston to meet Coventry's unmet need	See response above to same comment in respect of site 77.
Access through Thurlaston and limited transport provision – access to close to or through part of the village	The Stage 2 Site Assessment notes access from the B4429. It also highlights poor public transport accessibility. Site is considered in the Strategic Transport Assessment.

Major impact on landscape and rural character	A separation area is proposed to be designated at Thurlaston and that is part of the rationale for not including the site.
Residents already have to drive through an industrial estate to access the village	As above in respect of 77, this is understood to refer to existing warehouses at Symmetry Park.

Site 121 - Land at Walsgrave Hill

- One representation is attributed to this omission site from University Hospital Coventry and Warwickshire.

Issue raised	Officer response
Support Walsgrave Omission site – potential provision of a Blue Light Route is something UHCW is supportive of (UHCW)	Noted. Following other changes identified with regard to employment allocations, it is proposed that this site will be included in the proposed Submission Plan.

Summary of outcomes - omission sites

- Having reviewed feedback received and the evidence base, the only proposed change with regards to omission sites is the proposed allocation of site 121 for employment land.

Appendix 1 – Issues and Options Consultation Report



RUGBY BOROUGH LOCAL PLAN

ISSUES AND OPTIONS:

CONSULTATION REPORT

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Background

The Regulation 18 “issues and options” consultation ran from Monday 30 October 2023 to Friday 2 February 2024.

A notice was placed in the Rugby Observer on Friday 3rd November 2023. See [Appendix 1](#).

Notice of the consultation was sent by email and post to those on the council’s planning policy consultation database. This includes all neighbouring authorities, parish councils, borough councillors, duty to cooperate partners and statutory consultees.

The consultation was undertaken in line with the consultation strategy approved by the council’s cabinet at its meeting on 23 October 2023 and by council at its meeting on 25 October 2023. A copy of the consultation strategy is at [Appendix 2](#). The consultation strategy as prepared in accordance with the Statement of Community Involvement.

Online consultation events were held on:

- 8 November 2023 7-8pm
- 17 January 2024 7-8pm

A briefing for elected members was held on Thursday 23 November and a briefing for parish councils was held on 30 November 2023.

The following in person ‘drop in’ consultation events were held:

- Tuesday 14 November 2023 5-6pm Cawston Community Hall
- Tuesday 21 November 2023 4-6pm Dunchurch Village Hall
- Tuesday 28 November 2023 4-6pm Rugby Art Gallery & Museum
- Monday 4 December 2023 4-6pm Brandon & Wolston Village Hall
- Wednesday 6 December 2023 3.30-5.30pm Wolvey Village Hall
- Thursday 11 January 2024 11.30am-1.30pm Tesco, Leicester Road
- Thursday 18 January 2024 10am-12pm Asda, town centre
- Tuesday 23 January 11am-1pm Sainsbury, Dunchurch Road
- Tuesday 23 January 4-6pm Rugby Art Gallery & Museum

Throughout the consultation the consultation documents were available for inspection at the following locations:

- Rugby Borough Council's offices, Town Hall, Evreux Way, Rugby, CV12 2RR,
- Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ
- Dunchurch Community Library, The Green, Dunchurch, Rugby, CV22 6PA
- Wolston Library and Information Centre, Warwick Road, Wolston, Coventry, CV8 3GX.

The consultation documents were also made available on the council's website.

The consultation and consultation events were publicised using the council's social media channels. Social media reached 137,777 people. This is a mix of Facebook, Instagram and Messenger users and online ads.

A total of 274 formal written consultation responses were received. 9 respondents submitted more than one response, for example by both submitting an email and an online questionnaire response. Additionally, 61 consultation responses were submitted anonymously via the online questionnaire, without a name or address being supplied. In line with the Statement of Community Involvement, anonymous responses have been rejected.

112 responses were submitted via email, the remainder used the online questionnaire.

172 Responses were from private individuals, 60 were from landowners or developers promoting sites, 12 were from parish councils, 9 were from statutory consultees, 6 were from neighbouring local authorities and 15 were from other organisations.

A YouTube video explaining the consultation was watched 653 times.

A summary of the comments received, by question, is set out below.

Land for employment uses

How much employment land should we be planning for?

162 responses were received to this question.

Summary of comments:

- 30 responses questioned the need for additional employment land given high employment rates and existing supply, or (for example, the response of Warwickshire Wildlife Trust) sought as low as possible an allocation.
- Some responses, including those from Coventry City Council, North Warwickshire Borough Council and Harborough District Council and six comments from landowners/developers, endorsed the Coventry and Warwickshire HEDNA. Monks Kirby PC argued that Rugby Borough should take only its fair share of regional need and the focus should be on brownfield and non-Green Belt land.
- 10 responses from residents sought higher levels of employment land provision, with (amongst others) numbers of 250ha, 500ha and 600ha suggested.
- 15 responses encouraged the re-use of existing sites/buildings and raised concerns about loss of countryside.
- 10 responses suggested 150.5ha (the Rugby Borough industrial land requirement 2021-2041 identified in the Coventry & Warwickshire HEDNA) should be the amount planned for (i.e. no contribution to meeting sub-regional logistics need).
- 11 comments from developers identified the likelihood of unmet general industrial need from Coventry based on HEDNA numbers and stated that Rugby Borough should contribute to meeting this.
- Eight responses (including Stretton on Dunsmore PC) endorsed planning for the 2041 (not 2050) requirement. One response questioned planning for need beyond 2041 given likely societal and consumption changes and the growth of robotics and AI. Four responses, including three from developers, advocated planning to 2050.
- Six responses from developers argued that HEDNA numbers should be treated as a minimum.
- Five detailed reports critiquing the HEDNA and providing commentary on alternative projections for future employment land need were put forward by developers.

- Five comments from developers suggested that the HEDNA underestimates employment land need, of these: two stated strategic warehousing need was underestimated; another stated the HEDNA should have included large scale strategic B2; others argued market signals, reshoring/near-shoring and the growth of online retail suggested higher need.
- Four developers put forward comments on how the Coventry and Warwickshire strategic warehousing need should be split between the local authorities. One suggestion was that based on past completions 37% of the need should go to Rugby Borough. Others said a “substantial quantum” or “significant proportion” of the need should be met in Rugby Borough.
- Pailton PC questioned whether home working could reduce future land requirements.
- Two comments stated that the current supply of employment land should be disaggregated between ‘local’ general industrial supply and strategic warehousing supply. Comments noted that much of the existing supply at Ryton, South West Rugby, Coton Park and Prospero Ansty was for strategic warehousing.
- Stretton on Dunsmore Parish Council stated that planning based on a continuation of past trends for road-based logistics is not justified, would increase emissions, conflict with SA objectives and undermine Local Transport Plan 4. A resident highlighted that the trend-based approach to employment growth was predicated on continued inward migration to the borough and this was driving the expansion of HMOs.
- One response highlighted the Employment Land Report prepared by the Coventry and Warwickshire Chamber of Commerce (June 2023) as supporting 20% more employment land than recommended in the HEDNA due to alleged past undersupply.
- One comment highlighted the need for the West Midlands Strategic Employment Site Study to be published before the need for employment land can be quantified.
- One comment highlighted that the largest increases in employment to 2041 are projected to be in hospitality and public services but the HEDNA doesn’t address the land requirements of these sectors.
- One response argued for the importance of planning with West Northamptonshire and Harborough District Council in recognition of the impact of DIRFT and Magna Park.
- One response argued for jobs-to-homes balance to avoid Rugby becoming a commuter town.

What type of employment land should we be planning for?

162 responses were received to this question.

Summary of comments:

- 34 responses mentioned a need for industrial/manufacturing land, including strategic scale manufacturing.
- 36 responses (inc. Pailton PC, Thurlaston PC and Stretton on Dunsmore PC) expressed opposition to more warehouses, particularly large warehouses. Respondents expressed concerns about low skill and salaried jobs, low employment densities, traffic, high land-take use of greenfield land, high levels of existing warehousing including Magna Park and DIRFT, and lack of a diversified economy. Stretton on Dunsmore PC expressed concerns about the impact of warehouses on sustainability appraisal objectives for greenhouse gas emissions, air pollution, diversifying the economy and green recovery.
- 28 responses, including 16 employment land developers and landowners, mentioned the need for warehouses or strategic warehouses.
- 17 responses mentioned a need for offices, including shared office spaces.
- 18 responses sought space for small businesses/smaller units, with one report referencing the 2019 market signals study.
- Many of the responses, including eight developers sought a mix of employment land/diversified economy.
- 10 responses mentioned a need for small or medium “mid-box” warehouses.
- Other uses suggested: tech, services and public sector, solar and wind power (and other green industries), creative industries, small scale food production, vehicle fleet maintenance, research and development, bioscience, live-work units, engineering including expansion of existing employers like Alstom, Colas, Mercia, Arturn, Lenocho.
- A supermarket chain argued that there is low demand for office space and so only low levels of office space should be planned for.
- One respondent mentioned the need for employment sites in rural areas.
- One respondent argued for allocations for hotels, food and beverage uses, medical and health uses, and schools given these are the sectors with the highest projected employment growth.
- One respondent mentioned the need for HGV parking and storage.

Please provide any comments you have on the suitability of any of the broad locations listed above (or another location we have missed).

175 responses were received to this question.

Summary of comments:

- A high number of responses raised concerns about transport impacts on the road network, in particular at M6 Junctions 1 and 2, the A5, A426 and A4071 and on the northern side of Rugby. Others expressed concerns about HGVs on country roads.
- Some responses noted that highways upgrades would be needed on the A5.
- Some responses expressed concern about building industrial land and residential too close to each other. Some raised this concern in relation to South West Rugby.
- Concerns about traffic noise and air quality at Ryton on Dunsmore were raised.
- Several responses endorsed locations on major roads with the easiest connections to the motorway network.
- Several responses commented on the need for workplaces to be accessible by public transport and bicycle.
- Several responses expressed opposition to development in Green Belt locations. One developer noted the test for Green Belt locations is a “high bar”. A landowner said non-Green Belt locations should be considered first.
- One response pointed out that agricultural land to the south of Rugby is higher quality to that to the north of the town.
- A couple of the responses expressed preference for locations close to Rugby, to greater benefit local residents.
- National Gas requested that the council is mindful of the gas transmission network when selecting sites, while the EA noted the need to consider flood risk
- One developer response suggested the desirability of expanding existing sites.
- 21 responses from landowners/developers promoted the merits of their site.

- Two responses noted concerns expressed by the inspector in the last plan examination about the impact of development at A45 Walsgrave Junction on Coombe Park Grade 2* list and Coombe Pools SSSI.
- One response suggested locations South of Hinckley would meet Leicestershire's employment need.
- One response argued that locations on the edge of Coventry would meet Coventry's employment needs and not those of Rugby Borough.
- The Canal & River Trust asked that any development in the vicinity of the canal of feeder channel at M6 Junction 1 or south of Hinckley should protect them from any risk of damage or adverse impacts on water quality.
- A number of comments opposed or raised concerns about specific locations, including comments from Kilsby Parish Council (A5 north of Houlton), Pailton PC (Magna Park), Stretton on Dunsmore PC (A45 corridor), Thurlaston PC (South West Rugby safeguarded land). Thurlaston PC subsequently submitted a petition in relation to sites promoted between the B4429 and M45.
- Moto sought the safeguarding of the area north of the Rugby motorway service area for future expansion.
- National Highways provided preliminary comments on M6 Junctions 1 and 2, A46 Walsgrave Junction, Ryton, A45/A4071, A5 North of Houlton and South of Hinckley.
- Natural England highlighted sites within impact risk zones for Sites of Special Scientific Interest: Ansty Business Park expansion/A45 Walsgrave Junction, within the IRZ for Combe Pool SSSI; Prologis Park Ryton expansion, within the IRZ for Brandon Marsh and Ryton Wood SSSIs; Safeguarded land within the South West Rugby allocation, and A45/A4071 junction, are within the IRZ for Draycote Meadows SSSI; Other issues which may affect these designated sites are water supply, water quality and air quality.
- North Warwickshire Borough Council highlighted the importance of considering highways impact beyond the site.
- One response suggested that the R23/1027 application (Frasers Group, Ansty) is determined first, and if this is permitted no further land would be required. 18 responses were submitted which raised specific concerns/objections to that planning application.
- Severn Trent Water requested early insight into proposed site allocations to ensure capital investment is planned to accommodate future development.

The following locations were specifically proposed by one or more respondent:

M6 junction 2 (north of junction)
Ansty Business Park expansion
A46 Walsgrave Junction
Prologis Park Ryton expansion/A45 Ryton
Safeguarded land within the South West Rugby allocation
A45/A4071 junction/Blue Boar
A5 north of Houlton
A5 generally
M6 Junction 1
South of Hinckley
Rugby East
land south of Coventry Road
Land adjoining Ansty Park – Ansty North
Land adjoining Ansty Park – Ansty East
Land at Coton Park East
North of the M6 and south of the A426
Land to the south side of the M6
Land opposite Magna Park
Land at Ansty
Land at Tythe Platts Farm
Land north of J1, M6
Land to the south of Junction 1 of the M69
Rugby town centre (including for independents)
Europapark expansion
Land south of Dunchuch

Rugby Borough Council response:

Sites promoted by developers, including those listed above which were mentioned in representations and others submitted through the call for sites process, are being reviewed as part of the Housing and Economic Land Availability Assessment and site selection process.

The constraints and information raised by the Environment Agency, Canal & River Trust, National Gas, Natural England, Severn Trent Water will be taken into account in the site selection process.

How can we provide more space to allow existing businesses to expand?

134 responses were received to this question.

The following suggestions were made:

- Incubator sites/units (near Coventry Airport suggested).
- Use of or repurposing empty property, some suggesting Rugby town centre vacant shops or offices.
- Regenerate existing industrial sites, Somers Road, Paynes Lane and Hunters Lane suggested.
- Provide space within large employment sites (potentially as a “planning gain” requirement suggested by Newton & Biggin PC and North Warks BC and one developer).
- Expansion of existing sites.
- Rates reduction.
- Use of CPO powers to assemble a brownfield sites.
- Create a technology park or innovation centre.
- Reduce the amount of land given over to warehousing.
- Build small/medium unit estates, sub 1000sqm units (Newton and Biggin PC suggest one option could be for RBC to deliver units itself).
- Provide more self-build options.
- Allowing more small countryside developments.
- Increase space vertically.
- Relocate Rugby tip and reuse that space.
- Small start-up space should be close to housing.
- Allocating more employment land including smaller sites (10 developers).
- Retain Local Plan policy ED1 which supports expansion of existing businesses within existing employment sites.

- Allocate specifically for smaller-scale light industrial (Class E(g)(iii)) and industrial (Class B2) uses and smaller B8 uses.
- Allocate for big box units as they are the most viable and so will drive delivery (landowner).
- No need to allocate as HEDNA anticipates that 67% of current warehouses will be obsolescent as warehouses by 2043 and manufacturing employment will contract (resident).
- Allow existing businesses to expand in the Green Belt (landowner).

We are minded to allocate sites specifically for industrial (B2) and light industrial (E(g)(iii)) uses. Do you support this and if so, where?

155 responses were received to this question.

92 responses supported the proposal (including 8 landowners/developers).

56 responses did not support the proposal (including 6 from landowners/developers).

7 other comments or neutral responses were received.

Summary of comments:

- Objection on the basis that it would limit flexibility in the market.
- Argument that the evidence base isn't there to support sites solely for one sector (2 responses from developers).
- Support but flexibility should be included in the wording of any policy (2 developers).
- Suggestion that the council should allocate for local B8 use too.
- Given the large volume of warehouses becoming redundant over the plan period, there should be a policy of encouraging conversion from B8 to B2.
- Only restrict use to B2 where this is needed for environmental impact reasons.

The following locations were proposed:

M6 Junctions 1 and 2

A45

A4071

A5 near DIRFT

On the borders of Coventry where there is more existing industry

Ryton

North of Houlton
Houlton
Brownfield/regenerating existing sites such as Paynes Lane, Mill Road Industrial Estates, Hunters Lane
Walsgrave
Land to the south side of M6
Clustered around existing concentrations

Are there exceptional circumstances that mean we should amend Green Belt boundaries to meet the need for employment land?

176 responses were received to this question.

40 respondents said there were exceptional circumstances.

127 respondents said there were not exceptional circumstances.

Nine respondents commented without expressing a view as to whether there were exceptional circumstances.

Summary of comments:

- Adequate employment land available outside Green Belt.
- Green Belt release might be required to meet Coventry's unmet need on sites close to the city, this could be exceptional circumstances.
- Not undertaking a Green Belt review would have negative effects on the economy.
- Green Belt review needed to ensure sustainable patterns of employment development and to allocate sites where access is good.
- Lack of reasonable alternatives outside Green Belt to meet HEDNA need.
- Allocating in Green Belt should only be done once non-Green Belt options exhausted.
- An up to date Green Belt review should be carried out, consistent with Green Belt reviews of other councils.
- The HEDNA says Green Belt development will be needed for B8.
- The high employment rate, low unemployment means that a Green Belt review is not necessary.

Town centre regeneration

Do you agree with our proposals to remove the primary shopping area and primary and secondary frontage designations in Rugby town centre?

138 responses were received to this question.

71 responses agreed.

77 responses disagreed.

Summary of comments:

- NPPF para 90 still requires planning policies to define primary shopping areas.
- Traditional centres are too big for the market they serve given online and changes to retail. Need flexibility to evolve Support for flexibility and repurposing units.
- Specific references to Rugby Central, High Street and Sheep Street.
- Concern expressed about impact on older and disabled residents.
- Suggestion that the town centre should be a more compact area.
- Suggestion that medical and education uses should be encouraged.
- Some responses suggested a retail core still needed.

Which town centre sites should have site allocation policies and what should they say?

97 responses were received to this question.

Summary of comments:

- A lot of support for redevelopment.
- Several comments suggested the need to retain parking, including station parking with some suggesting free parking.
- Other comments supported improved bus facilities and promotion of active travel, or commented on the centre being overly car-dominated and suggested increased pedestrianisation.

- Comment on the need to change Rugby town centre from a shopping centre to an entertainment centre. However, some other comments sought more retail.
- Objection from Aldi to including the Cemex House site within any potential Rugby Central allocation, unless there is clear recognition of the acceptability of retail use on the site and sufficient flexibility is provided in terms of how it is brought forward.
- Consider the potential for land contamination (Environment Agency).

Specific sites suggested in multiple responses:

- Rugby Town Hall, The Benn Hall and Newbold Rd Car Park (although there were comments expressing support for retaining the Town Hall and Benn Hall buildings and another suggesting more community use of the Town hall)
- Rugby Central
- Webb Ellis Industrial Estate
- Royal Mail and Mill Road Car Park, Stagecoach (suggestion Mill Road Car Park should be developed for housing similar to Chaolais Gardens)
- John Barford Car Park, Old Market Place and Railway Terrace car park, support for this being returned to a market
- Rugby Borough Council depot on Albert Street

Other suggested sites/interventions:

- North Street Car Park (residential)
- Morgan Sindall
- Protection of the independent quarter
- Make North Street one-way and remove the taxi rank
- Office or business reuse of vacant shops (Fargo Village suggested as a precedent)
- More green spaces and quality of open spaces
- Improve walking route from station to town centre
- Alexandra Arms (protect as a pub)
- Destination for events
- Promote heritage, recreation, venues

Should we introduce a policy that sets out the improvements to streets and spaces we want to see in the town centre?

136 responses were received to this question.
 117 responses supported introduction of a policy.
 16 responses did not support introduction of a policy.
 3 neutral comments were received.

Summary of comments:

- Policy should ensure delivery of Rugby Regeneration Strategy.
- A lot of support for the policy to cover all of the town centre.
- Support for an indoor market.
- Suggestion that s106 contributions should be used for public realm improvements.
- Support for tree planting.
- Specific areas identified in responses as needing to be covered by the policy:
 - Newbold Road, Corporation Street
 - Clifton Road
 - Rugby Central
 - Old Market
 - Station Gateway
 - Rounds Gardens
 - High Street and Sheep Street
 - Station Place, Albert Street and Murray Road
 - North Street and Evreux Way (suggestions for pedestrianisation/bus only)
 - The Library
 - Market Place
- Policy shouldn't be overly prescriptive (supermarket developer).
- Biodiversity enhancements should also be considered in the town centre. This can include removing areas of hard standing to create more green/blue spaces and retrofitting SuDS on existing buildings (Environment Agency).
- Recognise and protect assets of community value (Pailton PC).
- Policy should make provision for transport, active travel, GI and BNG.

Should we define local centres? If yes, which centres should we include?

121 responses were received to this question.
 82 responses supported the proposal to define local centres.
 39 responses did not support the proposal.

Many responses expressed support for designating all of the potential local centres listed in the consultation document. One response said this would help support main town centre uses there and the monitoring of changes. One response suggested leaving the designation of local centres to neighbourhood plans.

One developer response suggested that district and local centres should be identified within any new strategic housing and employment allocations. This will ensure that growth comes forward alongside appropriate community infrastructure.

The master developer of Houlton argued Dollman Darm local Centre and Houlton District Centre shouldn't be defined as centres because the conditions of the Houlton planning permission are adequate to control them and the district centre won't be complete when the new plan is adopted.

Pailton PC questioned whether local centres might be more attractive to residents than the town centre and this could weaken town centre regeneration.

The following specific locations were mentioned:

Name of proposed centre	Number of responses that proposed the centre
Bilton	15
Hillmorton (High Street)	14
Dunchurch	10
Brownsover	9
Houlton	8
Paddox	7
Cawston	5
Clifton upon Dunsmore	6
Coton Park	4
Lower Hillmorton Road	3
Clifton Road	3
Newbold	3
Newton	3
Kingsway	2
Woodlands	2
Eden Park	1
Brinklow	1
Hillside	1
New Bilton	1
Hillside	1
Wolston	1
Shakespeare Gardens/Overlade Lane	1

Are there other things the local plan should do to support town centre regeneration?

127 responses were received to this question.

112 responses felt there were.

15 responses felt there were not.

Summary of comments:

- Free parking (generally, or after 6pm, weekends and on market days suggested)
- More parking, including in local centres at Bilton and Dunchurch
- Reduce traffic flows through the centre, more pedestrianisation
- Active travel and cycle routes
- Electric car charging/improve access by car
- Encourage independent businesses
- More residential uses
- More workspaces
- More green space, park connector project, street trees, floral displays
- School streets scheme
- Diversify offer
- Improve bus services
- Local gardens and shared community spaces
- Reduce business rates
- Bring back an indoor market and improve outdoor market
- Small music and arts/craft venues
- More events, festivals
- Stop further out of town retail (a number of comments identified how Elliotts Field has harmed the town centre)
- Improved the link between the town centre and the railway station
- Education, economic and social projects
- Focus retail/entertainment in one location, contract centre
- More space for the museum, art collection
- New incubator unit
- Social street furniture
- New supermarket in south of town
- Reuse of older buildings
- Compulsory purchase vacant sites
- New café needed at Eden Park
- Give consideration to site feasibility and viability to ensure that developments are deliverable.
- Avoid policies are not unduly restrictive and limit town centre investment and development (supermarket developer).
- Consider impact on the historic environment and seek archaeological advice, in line with NPPF guidelines (Historic England).
- Environmental improvements, tree planting

Pitches for Gypsies and Travellers

The council proposes to plan for Gypsy and Traveller pitches based on the ethnic need target of 79 pitches 2022-2037 identified in the GTAA 2022. Do you agree?

130 responses were received to this question.

59 respondents agreed with the proposal. 69 respondents did not agree with the proposal.

Two general comments were received.

Summary of comments:

- Not easy to meet even lower pitch target, plan should be realistic.
- Existing sites not fully occupied.
- State need figure (whichever is used) should be a minimum, not target.

Rugby Borough Council response:

In December 2023 the government amended the definition of Gypsy and Traveller in Planning Policy for Traveller Sites. The new definition is

“For the purposes of this planning policy “gypsies and travellers” means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

2. In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances”

This amends the previous definition which excluded those who had permanently ceased travelling.

The new definition is not the same as the ethnic need used in the GTAA 2022, therefore Rugby Borough Council have commissioned a new Gypsy and Traveller

accommodation needs assessment using the new government policy. This research is currently underway.

How can we find sites to accommodate the need for Gypsy and Traveller pitches?

- (a) Allocate sites for Gypsy and Traveller pitches as part of new employment land or housing developments?**
- (b) Regularise existing unauthorised sites?**
- (c) Create a new borough or county council-owned site?**
- (d) Other (please explain).**

135 responses were received to this question.

32 respondents supported allocation of pitches as part of new employment land or housing developments, two stating employment sites only.

64 respondents supported the regularisation of existing unauthorised sites.

57 respondents supported the creation of a new borough or county council-owned sites.

Summary of other comments:

Other options suggested were:

- Proactively identify and allocate new private sites, rather than being reactive (Shilton & Barnacle PC).
- On sites with derelict buildings.
- Sharing the sites between the rural and urban areas.
- Not regularising sites subject of outstanding enforcement action where it has been determined that they are inappropriate on planning grounds.
- Speak to the communities and find out where they want to be.
- Expanding existing sites.

Other comments:

- One landowner expressed concern about the viability impacts of an integrated Gypsy and Traveller site and the relationship between residents and the site.
- Environment Agency sought policy wording that “pitches should be located outside of the 1 in 100 year, plus an allowance for climate change, flood extent”.
- Stretton on Dunsmore PC opposed a general policy of regularising unauthorised sites as it would encourage more.
- Stratford-on-Avon District and Warwick District called for Rugby Borough to meet its own need before asking other authorities.

When allocating sites for pitches, what size of site should we be seeking to allocate?

91 responses were received to this question.

Summary of comments:

- One large (20 pitch) site and a number of small 2-5 pitch sites
- 10-20 pitches
- Max 1-2ha
- 2 acres
- 10-12 pitches maximum (8 responses, including North Warwickshire Borough Council)
- 5 or 6 pitches maximum (2 responses)
- 10/12 caravans (2 responses)
- Proportionate to size of existing settlement, services and facilities
- Smaller sites provide community balance/integrate better, put less pressure on local services
- Ask the community what they need (3 responses)
- There should be a maximum size of a site within a parish and restrictions on nearby sites (5 miles suggested)
- Small or large
- Prefer more small sites over fewer large sites (Shilton & Barnacle PC)
- Avoid aggregation of multiple sites in close proximity (Shilton & Barnacle PC)

Should we adopt a negotiated stopping policy which allows caravans to be sited at a suitable location for an agreed and limited period.

121 responses were received to this question.

63 (including Shilton and Barnacle PC and Pailton PC) supported a negotiated stopping policy.

58 did not support a negotiated stopping policy

Pailton PC said it would support such a policy, but only if supported by local community.

Houses in multiple occupation

The council proposes to introduce a policy to limit concentrations of HMOs within a 100m radius to 10% of dwellings, avoid non-HMO dwellings being sandwiched between two HMOs and avoid three consecutive HMOs on a street. Do you agree with this policy?

149 responses were received to this question.

120 supported the proposed policy.

29 did not support the proposed policy.

Summary of other comments:

- 30 responses suggested the policy should apply across borough to avoid displacement.
- 16 responses suggested limiting the policy to central Rugby or specific wards.
- 4 responses supported a stronger policy (for example 5% within 200m radius).
- Specific concerns expressed by multiple respondents about New Bilton and Benn Ward or Rugby town centre generally.
- Six responses suggested that there is a need to develop smaller, cheaper housing to remove the need for HMOs, Thurlaston PC suggested housing association/council housing needed.
- Four responses made a link between the development of warehousing and the proliferation of HMOs.

We also propose to introduce a criteria-based policy that sets clearer standards for parking, refuse storage, and the adequacy of external and internal space for HMOs. Do you support such a policy?

151 responses were received to this question.

140 supported the proposed policy.

11 did not support the proposed policies.

One neutral comment was received.

Summary of other comments:

- Several responses raised concerns about the adequacy of car parking, one mentioned bin facilities .
- One response noted that HMOs will need to play an important role because of the rising age of first-time buyers and that high quality HMOs are required.
- The Environment Agency commented as follows: “HMOs often have ground-floor sleeping accommodation. This puts those on the ground floor at the highest risk of flooding. Therefore, in areas within the 1 in 100 year plus climate change, we recommend HMOs should 1) When they are new build, have finished floor levels set a minimum of 600mm above the 1 in 100 year plus climate change level; or 2) When they are change of use, raise finished floor levels to 600mm above the 1 in 100 year plus climate change. If this is not possible, a water exclusion strategy and flood resistant construction should be put in place and there should be no ground floor sleeping.”.

Climate change policies

Should we show areas of the borough in which wind and/or solar energy will be supported? Is so, where?

157 responses were received to this question.

123 supported identifying areas where wind and/or solar energy will be supported.

24 did not support identifying areas where wind/solar will be supported.

10 other comments were received.

The following locations were suggested:

- 28 responses (including two major industrial land developers) suggested renewable energy on or near to industrial land, including solar panels on roofs.
- 26 responses said wind and solar should be allowed anywhere in the Borough that is suitable. 5 of those responses specifically said that this should include Green Belt land.
- 18 responses suggested solar panels on motorway/A-road central reservations or verges.
- Six responses expressed opposition to solar or wind energy on Green Belt land.
- Six responses suggested renewable energy generation in residential developments or on homes.
- Two responses argued the need to protect farmland, while two others stated support for solar only on farmland (not wind).
- Two responses suggested solar panels on the roofs of public buildings.
- One response from a landowner promoting a solar farm was received.
- Churchover PC expressed concern about the impact of solar farms.
- One respondent said there were very special circumstances for identifying sites for renewable energy in the Green Belt.
- Warwickshire Wildlife Trust said that solar farm locations should be selected to reduce biodiversity impact.
- Natural England stated that care should be taken to safeguard the best and most versatile agricultural land.
- One response stated that on-shore wind is the cheapest source of energy.
- Moto Hospitality Limited suggested that the neighbouring field north and west of Rugby motorway service area is suitable for ground mounted solar to support EV charging.

If some new wind development schemes could be community owned by RBC residents, would that increase your support for this type of development?

138 responses were received to this question.

85 responses said their support for wind energy schemes would be increased by community ownership.

53 responses indicated that it would not affect their support for this kind of development.

One response suggested creation of a community energy trust

We are minded to introduce a policy that supports other zero carbon energy infrastructure including battery energy storage and hydrogen energy infrastructure. Do you agree?

150 responses were received to this question.

112 responses (including Prologis and Segro and Thurlaston PC) supported the proposed policy.

37 did not support the proposed policy.

One response was unsure/neutral

Summary of comments:

- This should be close to existing grid infrastructure.
- 12 responses suggested support for this technology anywhere in the borough.
- 7 suggested locating on industrial land.
- 4 expressed doubt about the green credentials of either hydrogen or battery energy storage.
- One response opposed Green Belt locations.
- One response said that renewables should be favoured ahead of these technologies.
- Two responses suggested utilising vacant buildings in Rugby town.

- One developer said there is scope for energy storage within large scale industrial and logistics developments to contribute or meet their own operational needs.
- One developer said given the fast-moving pace of technological change in this sector it is important to maintain flexibility and not introduce mandatory requirements.

Should we adopt a minimum tree canopy policy for new development?

184 responses were received to this question.

157 responses (including two developers, Warwickshire Wildlife Trust, The Woodland Trust and the Environment Agency) supported a minimum tree canopy policy for new development.

18 responses including 10 landowners/developers did not support a minimum tree canopy policy for new development.

9 other responses were received.

Summary of comments:

- 63 responses felt this should apply everywhere and to all new developments.
- Six responses raised concerns about the loss of existing trees.
- Four responses suggested tree planting in existing areas.
- Four responses suggested a 15% requirement (one referencing this as the old National Forest requirement), another suggested 25%, the Woodland Trust suggested 30%
- Seven developers/landowners raised viability concerns with the policy.
- Four responses argued the policy was not needed because of biodiversity net gain or would potentially conflict with that policy.
- Four responses, including that of the Home Builders Federation, asked for additional evidence to justify the policy.
- Three stated the policy wouldn't be deliverable on some sites due to constraints.
- Three sought flexibility in the policy.

- Three suggested along roadsides while another suggested trees should not be planted near roads (a minimum of 5 metres away).
- One response suggested allergenic trees like Birch shouldn't be planted. One response suggested native trees. One suggested heritage fruit trees. Natural England, The Woodland Trust and the Environment Agency argued that the maximum proportion of new trees should be native, UK and Ireland sourced and grown as won't introduce pests.
- Natural England stated "tree planting may not be appropriate for all sites, and may not in itself increase biodiversity, carbon sequestration or urban cooling, and trees can take many years to reach maturity. A variety of habitats should be considered... Where tree planting or other habitat creation is undertaken the specimens chosen must be a range of local native species, and a management plan implemented to insure their establishment."
- One landowner suggested that a minimum tree canopy policy would be easier to apply and to understand the viability impacts of, than would setting biodiversity net gain at greater than 10%
- One resident, supporting the proposal, stated that trees reduce surface temperatures through shade and evapotranspiration, enhance the look of environments, shelter wild life and are good for mental health.
- One response said the Tree Score Equity Map would show where trees are needed the most.
- One developer response stated it would be incompatible with large-scale B8 warehousing development where a very large footprint is needed.
- Newton and Biggin PC stated that Warwickshire County Council support would be needed, given its historic opposition to street trees.

Other options suggested:

- 2 responses suggested this should apply on large developments, with one suggesting 20+ houses.
- All residential developments over 10 units (2 responses).
- residential development only (2 responses).
- All residential over 5 units.

Should we identify priority locations or allocate sites for biodiversity net gain and, if so, where?

163 responses were received to this question.

127 (including 11 developers/landowners) responses supported the identification of priority locations or site allocations for biodiversity net gain.

25 responses did not support the identification of priority locations or site allocations for biodiversity net gain.

11 other responses were received.

Summary of other comments:

- Large habitat creation on identified sites is likely to maximise the biodiversity net gain that can be achieved.
- Having reasonable options for off-site improvements will assist developers who can't meet requirement on-site.
- Hold a call for sites specifically to request land to be considered for BNG (three respondents).
- Prioritise connectivity between green/blue spaces (Environment Agency).
- Seek 20% Biodiversity New Gain (Woodland Trust, Warwickshire Wildlife Trust) with The Woodland Trust suggesting a 50 year maintenance period.
- BNG sites should either be located on land managed exclusively for nature conservation purposes or at existing/new country park sites that, despite being publicly accessible, are managed appropriately to maximise BNG.
- Site allocations that can provide more than 10% BNG should be prioritised.
- Identify sites of limited ecological interest to maximise gain (developer).
- Off-site contributions should go to "demonstration sites" close to Rugby so residents can enjoy nature nearby or to improving connectivity around key habitats which emerge from the nature recovery strategy.

Locations suggested included:

- On site/as close as possible to site (6 responses)
- Within borough (6 responses)

- Expand existing sites (6 responses)
- Anywhere (3 responses)
- Swift Valley (2 responses)
- Alongside waterways
- South of Hillmorton (2 responses)
- South of Rugby (2 responses)
- Old disused gold course next to Brandon Marsh wildlife centre
- Rounds Gardens
- Ansty
- On low quality farmland
- On urban/rural periphery
- North of Houlton
- Alongside disused railway lines
- Area south of St Cross Hospital

Would you support the creation of an additional country park as part of delivering biodiversity net gain?

164 responses were received to this question.

145 responses (including Natural England, Environment Agency) supported the creation of an additional country park as part of delivering biodiversity net gain.

15 responses (including Warwickshire Wildlife Trust) did not support the creation of an additional country park as part of delivering biodiversity net gain.

4 other responses were received.

Summary of other comments:

- Opportunity to create a community park at Prologis Park Ryton West (developer), similar community park proposal at land at Walsgrave (also developer).
- Country parks should be run and managed by borough council to retain direct control over delivery of BNG, this would be simpler than having to rely on offsetting providers in the private market also has wider benefits for residents in access to countryside and recreation opportunities (two developers).
- Residents should be able to walk/cycle to sites.
- Country parks would need to be high quality habitat (not amenity grassland or open water) and should prioritise habitat connectivity (Environment Agency).
- Concern about policies that go further and faster than national guidance could undermine emerging BNG local markets (Home Builders Federation).
- County parks are often noisy, busy, sites which allow access to dogs, and noisy play areas. Areas for biodiversity net gain, should be for that purpose and as such managed to conserve and enhance wildlife and important habitats (Warwickshire Wildlife Trust).
- This shouldn't just include large country parks but also community orchards and woodlands (Stretton on Dunsmore PC and resident).

Locations suggested included:

- Cawston woods/within South West Rugby site (10 responses)
- Houlton/between Houlton and Crick (6 responses)
- Quarries (Astons farm/Cemex (5 responses)
- Rainsbrook Valley (6 responses)
- North of Rugby/Coton Park (5 responses)
- Hillmorton/south of Hillmorton (4 responses)
- South Rugby/Dunchurch (4 responses)
- Clifton upon Dunsmore/between Houlton and Clifton upon Dunsmore (4 responses)
- Swift Valley/Elliott's Field (2 responses)

- Avon river floodplain (2 responses)
- Ansty (2 responses)
- Monks Kirby
- Brook Valley Nature Reserve, Queen's Diamond Jubilee Woodland
- Near Draycote reservoir
- Wolfhamcote or Grandborough parish
- Land behind Rounds Gardens
- Along old Great Central railway line
- West of Rugby near Cemex

Should we require developers to prioritise the delivery of biodiversity gain within close proximity to the development?

171 responses were received to this question.

142 responses supported a requirement to prioritise the delivery of biodiversity gain within close proximity to the development.

24 responses did not support a requirement to prioritise the delivery of biodiversity gain within close proximity to the development.

Five other/neutral response was received.

Summary of other comments:

- Support where mitigation cannot be met on site (developer, Environment Agency).
- There could be a potential for conflict with policies which seek to centralise or consolidate areas for the provision of BNG and in such circumstances the benefits of consolidation should prevail (developer).
- Policy not necessary in light of national legislation/would conflict with that legislation (three developers, two land promoters, one landowner).

- Concern that it could prevent sites being developed if there is no nearby suitable BNG site (two developers, landowner).
- The plan should reference on site delivery, off site delivery and statutory credits (Home Builders Federation).
- There should be flexibility in the requirement depending on the type of habitat which is required.
- Close proximity is difficult to define and creates the potential for ransom strips for nearby landowners (developer).
- Could lead to piecemeal/smaller net gain (landowner).

We are considering requiring all residential developments to be net zero. Do you agree?

175 responses were received to this question.

130 responses supported a requirement for all residential developments to be net zero.

40 responses did not support a requirement for all residential developments to be net zero.

Five neutral/other comments were received.

Summary of comments:

- Viability evidence is needed (landowner, developer).
- Concern about impact on viability (three developers, West Midlands Housing Association Planning Consortium).
- Policy would be onerous (developer).
- Policy should be flexible to support viability and delivery (Homes England).
- Building Regulations are the most appropriate way of controlling building energy performance, changes to Building Regs coming (five developers, landowner, Home Builders Federation, Homes England, West Midlands Housing Association Planning Consortium, North Warwickshire Borough Council).

- Concern that bespoke local policy would undermine economies of scale (developer).
- Explore opportunities for waste management and resource efficiency (Environment Agency).
- Need to consider the role of the current building stock in diminishing carbon emissions (Historic England).
- Cornwall is a unique case because of government investment (developer).
- Should only be mandatory for EIA development, but encouraged for smaller development.
- There should be a transition period (Pailton PC).
- An alternative could be a presumption in favour of zero carbon development (care home developer).

We are considering requiring all non-residential development to be net zero. Do you agree?

176 responses were received to this question.

137 responses supported a requirement for all non-residential developments to be net zero.

31 responses did not support a requirement for all non-residential developments to be net zero.

Eight other/neutral comments were received.

Summary of comments:

- Policy needs to be justified by viability evidence (two developers).
- Viability concerns raised (landowner).
- Operational stage new zero carbon is often out of the control of the developer to manage as it depends on occupier requirements (developer).
- New zero is a realistic prospect for the large scale industrial and logistics sector (developer).

- Onerous policies would undermine delivery (developer). Developer support would be important (Newton & Biggin PC).
- It would help if neighbouring authorities adopt the same standards.
- In accordance with the recent Written Ministerial Statement the council should not set energy efficiency standards that go beyond the current or proposed building regulations (land promoter).
- Policy should be flexible/encourage rather than require (land promoter, developer).
- Some types of commercial or industrial development won't be able to achieve net zero because of operational requirements (land promoter).
- Supported where feasibility and viability allow (supermarket chain).
- Topic is being addressed through Building Regulations (land promoter, developer, two landowners, North Warwickshire Borough Council).
- Difficult to agree a definition of new zero (landowner).
- Policy should consider the existing building stock (Historic England).
- Further information needed on proposed standard (landowner).
- Policy should only be mandatory for EIA development, but encouraged for smaller development (resident).
- Suggest alternative as "presumption in favour of zero carbon development" (care home developer).
- NHS property could benefit from offset funds.

Are there other climate change policies we should be introducing?

98 responses were received to this question.

Summary of comments:

Eleven responses (included Thurlaston PC and Natural England) highlighted sustainable drainage and a reduction of hard impermeable surfaces. Two of the responses raised concerns about large hard surfaced areas at warehouses.

Nine responses suggested construction of more cycle lanes and/or improved facilities for walking.

Seven responses highlighted the importance of new green spaces and/or trees, and four including Warwickshire Wildlife Trust mentioned green roofs.

Five responses expressed support for avoiding building on flood plains.

Five responses suggested reducing new building/housebuilding/warehouse building.

Five responses (including Thurlaston PC) mentioned improving public transport.

Five responses (including Thurlaston PC) mentioned building insulation with one mentioning insulating existing homes.

Five (including the Environment Agency) suggested rainwater harvesting.

One response argued climate policies destroy jobs and businesses, questioned the scientific basis for human-caused global warming, and stated that Britain is only responsible for a small proportion of global emissions. Three expressed concern about the cost of complying with policies.

Two responses suggested renewable energy generation (not tied to other developments), with three others suggesting that the council invest in renewable energy generation including solar panels on council buildings.

Three responses highlighted air quality issues due to traffic, with one tying that to HGVs.

Others mentioned in one or two responses:

- Avoid policies that go further or faster than national policy as this leads to a patchwork of local standards (Home Builders Federation);
- Introducing a policy in support of renewable energy development in the Green Belt (landowner);
- controlling Green Belt development;
- EV charging, including in car parks;
- limiting parking provision, introducing residential parking permit requirements for wider areas;
- restricting national permitted development rights which allow hard surfacing of front gardens;

- retrofitting RBC buildings to be net zero;
- lifetime impacts of developments;
- white/reflective roof surfaces to reflect sunlight back into space;
- district heating;
- Allocate for community orchards and woodlands (resident and Stretton on Dunsmore PC) or community allotments (Warwickshire Wildlife Trust);
- Extra care housing can be sustainable when located in rural areas outside villages (care home developer);
- Demanding criteria for new helipads.

Other proposals, which fall outside of the scope of planning policies included:

- need for National Grid to support more generation of electricity from residential and commercial developments;
- carbon capture;
- improved recycling;
- communal green travel;
- infrastructure for hydrogen cars;
- intelligent street lighting;
- improving or enlarging Draycote Water;
- repairing potholes;
- banning natural gas.

Should we require non-residential development to meet higher water efficiency standards to reduce water usage?

165 responses were received to this question.

139 responses supported a requirement for non-residential developments to meet higher water efficiency standards to reduce water usage.

19 responses did not support a requirement for non-residential developments to meet higher water efficiency standards to reduce water usage.

Seven neutral/other comment were received.

Summary of comments:

- Policy would need to be flexible as may be difficult for some operators to achieve and this could stifle economic growth (land promoter, developer) policy should encourage not require (developer).
- Viability concern (developer).
- Standards should be set through building regulations, not planning policy (developer)/ duplicating part G of the Building Regulations and forthcoming changes to the Building Regulations could cause confusion (landowner, developer).
- Policy would need to be fully justified and supported by a viability appraisal (developer).
- There should be rain water harvesting and grey water systems for large development (resident).
- Different councils operating different policies could slow development (developer).
- It would be helpful if neighbouring local authorities adopted similar policies (Newton and Biggin PC).

Design coding and guidance

Should we produce design codes as part of our new local plan?

162 responses were received to this question.

136 responses supported the production of design codes as part of our new local plan.

19 responses did not support the production of design codes as part of our new local plan.

7 other responses were received.

Summary of comments:

- Producing a design code as part of a local plan would add additional expense and slow down the process (two developers).
- Design codes should be prepared collaboratively with developers (Home Builders Federation, developer).
- Current applications should be taken into account in producing a design code.
- Design codes are useful for giving specific areas an identity.
- Design codes should not be too prescriptive.
- Design codes should be informed by all statutory consultees and stakeholders and not conflict with other local plan policies (developer).
- Design codes should reflect the difference characteristics of different places.
- Design codes should identify design principles that take account of the nature and multi-functional role of the canal network and consider how new development proposals can benefit from waterside locations (Canal & River Trust).

Which areas should design codes cover?

(a) Borough-wide

(b) Borough-wide divided into character areas

(c) only for some neighbourhoods (please specify which),

(d) only for large new development sites

(e) other (please specify)

151 responses were received to this question.

47 responses supported a borough-wide design code.

76 responses supported a borough-wide design code divided into character areas.

3 responses felt that design codes should be only for some neighbourhoods.

23 responses supported design codes only for large development sites.

Two other comments were received.

Summary of other comments:

- Three responses felt that design codes should cover some neighbourhoods only, with Eden Park and Victorian terraces suggested.
- Three developers sought a flexible approach to design, based more on guidance than prescription.
- Pailton PC supported a borough-wide design code but suggested that large developments could jump start the policy and suggested the use of neighbourhood plans and village design statements.
- Two developers stated small to medium sized sites don't require design codes.
- One respondent suggested borough wide minimum quality and dwelling size requirements, similar to the London Plan.
- Two respondents suggested design codes should be introduced for conservation areas or other areas of architectural or historic value.
- One respondent felt that design codes would produce bland results and discourage modern or challenging architecture.
- One response felt that money would be better spent on other things than on the production of design codes.

- The master developer of Houlton said it should be exempt from the policy because there is already design coding in place for the site through the outline planning permission
- The Home Builders Federation stated that the most appropriate scale for any Design Code or Guidance is therefore likely to depend on the size, scale and type of development it is being applied to. A Site-Wide Masterplan prepared in conjunction with a site allocation would need to be different from a Design Brief for a city centre regeneration opportunity, or a small-scale development in a village.

Land for housebuilding

How many homes should we be planning for?

- (a) Minimum local housing need**
- (b) The HEDNA 2022 need**
- (c) Other (please specify)**

182 responses were received to this question.

83 responses supported minimum local housing need.

46 responses supported the HEDNA 2022 need.

48 responses suggested other options.

Five other/neutral comment was received .

Summary of other comments:

- 14 responses opposed building any more homes, citing infrastructure concerns.
- Two responses sought more social housing.
- The Home Builders Federation suggested the housing requirement was more than both the HEDNA and standard method. This view was also expressed by two residents and several landowners/land promoters and developers (as detailed below).

- Nine responses (four land promoters, four developers, landowner) said there would be unmet need from Coventry.
- Nine responses (three land promoters, five developers, landowner) argued the need to uplift to provide more affordable housing.
- Six responses (from three land promoters, two developers and the Home Builders Federation) argued the need to uplift from the HEDNA to sustain economic growth.
- Four responses (land promoter, two developers, land owner) argued the HEDNA should be a minimum.
- Three (landowner, land promoter, developer) argued planning to 2050.
- Two landowners responded supporting adding a 10% supply buffer.
- One developer argued that the HEDNA underestimated migration to Rugby Borough from London.
- The HEDNA doesn't demonstrate exceptional circumstances to justify departure from standard method, it exaggerates methodological issues in population estimates for Coventry and would risk under-supplying homes (developer).
- Supply is over-estimated (developer).
- A higher housing target would harm nature recovery (Warwickshire Wildlife Trust).
- The HEDNA is more robust evidence (Warwick and Stratford on Avon district councils).
- Oppose accommodating Coventry's unmet need (Thurlaston PC, Stretton on Dunsmore PC).
- There are exceptional circumstances based on overestimation of Coventry's population (landowner).
- If HEDNA is used it should be adjusted for suppressed household formation (developer).
- In 2025 ONS will publish household projections which correct for the Coventry issue and the standard method will be updated (developer).
- Plan period should be re-based as data becomes available.

The following other options were put forward:

- One response favoured a job-creation led housing target.
- Two responses (including Thurlaston PC) suggested a housing target between the standard method and HEDNA numbers.

Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Gardens and Biart Place)?

161 responses were received to this question.

143 responses supported improving existing and developing new social and affordable housing.

15 responses did not support improving existing and developing new social and affordable housing.

3 other comments/neutral responses were received.

Summary of comments:

- One affordable housing developer and one land promoter argued for an uplift to total housing need to deliver more affordable housing.
- One developer response suggested distributing affordable housing across the borough, rather than concentrating it in one location.
- One resident supported more affordable housing but not at the expense of green space.

Please provide any comments you have on the suitability of any of the broad locations listed above for new housing. Are there any locations that we have missed?

153 responses were received to this question.

Summary of comments:

Numerous responses from developers/landowners promoted specific sites.

Conversely, many respondents expressed their opposition to development in specific locations, often citing infrastructure, traffic or landscape concerns. At least 41 responses mentioned one or more locations in which the respondent opposed development.

Seven responses expressed opposition to development of Green Belt, while eight responses expressed opposition to development at villages.

Fewer resident responses expressed support for development in specific locations. The most popular such location was Rugby town centre (six responses). Three responses advocated for a policy of concentrating development at urban locations with better access to services. Conversely, two responses favoured a more dispersed pattern of development including smaller villages.

All of the indicative locations garnered some support from one or more respondent. Additional locations mentioned included Monks Kirby, Brinklow, Newton.

Other comments:

- Anti village developments (8 responses including Stretton on Dunsmore PC).
- Avoid Green Belt (8 responses), one developer stated there is no evidence for exceptional circumstances for Green Belt release.
- Anti Ryton on Dunsmore (4 responses).
- Anti Stretton on Dunsmore (5 responses including Stretton on Dunsmore PC based on floor risk, narrow roads and the sewage pumping station discharging into Princethorpe Brook also argue that Squires Road and Little Orchard shouldn't have been allocated).
- Anti Wolston.
- Anti east of Coventry.
- Anti south of Hinckley.
- Anti Wolvey (3 responses).
- Anti south of Hillmorton/Rainsbrook Valley (13 responses including Kilsby Parish Council).
- Anti South West Rugby (6 responses – including Thurlaston PC).
- Anti Clifton upon Dunsmore (7 responses).

- Anti Rugby generally.
- Pro main rural settlements in order to ease the pressure on the urban area (2 responses).
- Pro brownfield/town centre (6 responses).
- Pro east of Coventry (6 responses).
- Pro Wolston .
- Pro south of Hillmorton (4 responses).
- Pro Ryton on Dunsmore (3 responses).
- Pro south of Hinckley (2 responses).
- Pro Newton (developer).
- Pro Binley Woods (2 responses).
- Pro Dunchurch (3 responses).
- Pro Wolvey (2 responses).
- Pro Stretton (1 response).
- Housing should be close to public transport or urban areas to reduce car use (2 responses).
- Suggest development at smaller villages/ pro dispersal (2 responses).
- Housing should be close to employment areas .
- Pro Clifton upon Dunsmore (if A5 junctions upgraded).
- Favour large development with facilities over small dispersed sites
- Pro west of Rugby.
- Suggest development at Brinklow, Long Lawford and Monks Kirby.
- Objection to Linden Tree Bungalow allocation based on concerns about safety of access.

- Be mindful of gas/electricity assets in assessing sites (National Gas, National Grid).
- Comprehensive Green Belt study needed (landowner).
- Protect canal infrastructure from damage in considering site allocations and ensure development enhances role of canal corridors (Canal & River Trust).
- Consider education infrastructure requirements, the new plan should identify specific sites for school places to support growth (Department of Education).
- Produce a HELAA to ensure a strong and robust evidence base (Environment Agency).
- Allocate a range of sites across the settlements, with a preference for sites of 200-300 homes which can be delivered more quickly than the large SUE sites and deliver affordable housing (land promoter).
- Provide a range of deliverable and developable sites, 10% of housing requirement should be on sites no larger than one hectare (Home Builders Federation).
- If the Council allocated the South West Rugby safeguarded land for development (housing or employment) there needs to be a mechanism for it to contribute to and share the cost of infrastructure provision (Home England).
- Centre growth at borough's most sustainable settlements, with any new strategic allocations focusing on the town of Rugby (land promoter). Larger villages with more facilities may be more sustainable than urban edges remote from facilities (Newton & Biggin PC).
- Emphasis non-Green Belt location first (developer).
- Green Belt locations are the most sustainable and deliverable, site selection should focus on accessibility, community and social facilities, BNG and reducing carbon emissions (developer and land promoter).
- Additional development at South West Rugby on top of that which is already planned may mean that existing improvement plans require revision to ensure the full growth risk is resolved (Severn Trent Water).
- There are likely to be constraints with Rugby Newbold Wastewater Treatment Works (WwTW) due to the environmental capacity of the receiving waterbody, meaning that revisions to permits are increasingly tight and difficult to meet considering the best available technology (Severn Trent Water).

- Support extra care housing in rural locations (developer).
- Most important criteria in selecting new sites should be sustainability, including public transport (resident).
- In selecting sites avoid the Best and Most Versatile agricultural land.

Do you support a requirement for all new dwellings to meet the additional Building Regulations standard for accessible and adaptable dwellings and for at least ten percent of dwellings to be suitable for wheelchair users?

155 responses were received to this question.

123 responses supported the proposed requirements. Among the supporters were five developers.

29 responses did not support the proposed requirements.

Three neutral/other comments were received.

Summary of comments:

- Those objecting cited concerns about viability, need for additional evidence to justify the policy.
- Two response expressed concern that the policy may not be technically deliverable.
- One developer and the Homes Builders Federation said it isn't needed in light of Building Regulations. Another suggested that future changes to Building Regulations will remove the need for this.
- Three responses from developers stated they would support the policy, but it should be flexibly applied to take into account site constraints and viability.

Please provide any comments you have on the type and size of new homes we need.

114 responses were received to this question.

Summary of comments:

- Affordable homes/homes that are affordable (26 responses) one response noted a need for social housing in the urban area.
- 2 and/or 3 bedroom homes (20 responses).
- Bungalows (17 responses).
- 1 beds/small homes (11 responses) – 2 responses suggested this will combat HMOs.
- Homes for ageing population (10 responses).
- More diversity of house sizes/a wide mix (6 responses).
- Call for flexibility site by site and to respond to market conditions (5 responses from developers).
- Improved quality homes (4 responses).
- Self-build plots (4 responses although Home Builders Federation stated that it does not support a percentage of units on a site being for self build)
- Apartment buildings (3 responses).
- Larger/executive homes (3 responses).
- Maisonettes (3 responses).
- Support use of HEDNA evidence on housing mix (2 responses).
- Larger 3 or 4 bed social housing.
- Purpose-built HMOs.
- Allocate sites for extra care (extra care developer) with the Home Builders Federation also calling for the allocation of sites for specialist development.
- Specialist care accommodation, not just adaptable housing (extra care developer).

- Passivhaus/carbon neutral homes.
- Affordable housing for NHS staff (NHS Property Services).
- Homes England noted that the HEDNA housing mix doesn't align with the Rugby Borough Council Housing Strategy 2022-2024 housing mix.
- One developer response opposed the Nationally Described Space Standard.

Other topics

Are there any other issues or policies (not covered by the questions above) that we should cover in the new plan?

123 responses were received to this question.

Issues raised in multiple responses:

- Healthcare: Hospital provision/GPs/dentist/pharmacies (18 responses).
- Pot holes/ road improvements/traffic congestion (15 responses).
- Schools (13 responses).
- Inadequate parking (10 responses).
- Bus provision improvements and multi-mode passes (8 responses).
- Need for sport/leisure/play facilities/green corridors (8 responses).
- Sustainable drainage including rain water storage/flooding/water quality (8 responses, including Severn Trent Water response with proposed policy wording).
- Pro sustainable travel and creation of cycle paths (5 responses).
- More local services/facilities in large developments (5 responses).
- Green Belt protection (4 responses).
- Police and fire (4 responses).
- Protection of the rural landscape (3 responses).

- Rugby Parkway Station (2 responses) + one suggestion of a station at Long Lawford.
- Approach to Rugby town centre on A426 (attractiveness of) (2 responses).

Other issues raised (non-exhaustive list):

- Speed limit reduction.
- Opposition to '15 minute neighbourhoods'.
- Heritage preservation.
- Rerouting HGVs out of central Rugby.
- Appointment of sustainability champion.
- Poor design quality of new houses.
- Long-term food security.
- Swift bricks and hedgehog friendly boundaries in new developments.
- Need for more community/cultural spaces and protection of existing facilities.
- Creation of a rugby club with infrastructure for Premiership level to raise profile and attract visitors to the town.
- Opening up to the public of the tunnel under the station.
- Bus rail interchange.
- Local plan not overriding neighbourhood plans.
- Affordable housing.
- Improve footpath from Rugby to Draycote on disused railway line.
- River water quality in River Avon catchment (Stretton on Dunsmore PC).
- Need for additional allotments.
- Light pollution from warehousing (Churchover PC).
- Need for a site for a new Sikh temple (Rugby Sikh Gurdwara).

- Sites for locally produced food.
- Unadopted roads create problems for residents of new developments.
- Canal network should be recognised as a non-designated heritage asset (Canal & River Trust).
- Engage with Department of Education in preparing the plan and prepare a planning for schools topic/background paper setting out how forecast housing growth is translated into an identified need for a specific number of school places and schools (Department of Education).
- Groundwater and contaminated land should be a key sustainability issue (Environment Agency).
- Policy should require development to improve the ecological status of waterbodies to meet Water Framework Directive objectives as well as conserving and enhancing existing watercourses and riverside habitats (Environment Agency).
- Call for a heritage topic paper of heritage assessment section within a wider evidence document (Historic England).
- Don't deviate from 10% biodiversity net gain (Home Builders Federation).
- Local Plan should link with local nature recovery strategy (Home Builders Federation, Warwickshire Wildlife Trust) and applying it in site selection (The Woodland Trust).
- Everyone should be no more than 300m from their nearest natural green space. Apply Woodland Trust Access to Woodland Standard – 2ha wood within 500m of every home (Woodland Trust).
- Adopt Bristol Tree Replacement standard (Woodland Trust).
- Protect non-designated habitats like potential local wildlife sites (Warwickshire Wildlife Trust).
- Update green infrastructure evidence and identify corridors (Warwickshire Wildlife Trust).
- Incorporate playing pitch calculator and refer to Playing Pitch Strategy (Sport England).

- Allocate land for sports clubs that need new pitches e.g. Old Laurentians RFC (Sport England).
- Policy on protecting non-designated heritage assets including Coventry Stadium (Save Coventry Speedway).
- Produce updated evidence on landscape, Green Belt, transport, heritage, habitats and open space (resident).
- Identify new footpath provision (resident).
- Protect Princethorpe Biodiversity Area.
- Request for s106 contributions for health infrastructure (NHS Property Services).
- Oppose policy that would try to retain surplus NHS estate in alternative community use (NHS Property Services).
- Seek policy on healthy developments including health impact assessment, active travel, access to health food, design promoting social interaction (NHS Property Services).
- Designate Local Green Spaces (Natural England).
- Prepare a strategic transport assessment (National Highways).

Do you support our intention to bolster our policies on sustainable travel?

155 responses were received to this question.

127 responses supported bolstering policies on sustainable travel.

23 did not support bolstering policies on sustainable travel.

5 neutral responses or other comments were received.

Summary of comments:

- Four responses specifically sought links to Warwickshire County Council's Local Transport Plan 4 (LTP4) and a forthcoming transport plan for Rugby produced by the county council.

- One respondent, a developer, noted that LTP4 states that modern strategic logistics centres represent an opportunity to substantially reduce the carbon footprint of logistics through the efficiency and by accommodating electric vehicle charge points. The same respondent noted that LTP4 stated that it is important to located logistics on major routes.
- Stretton on Dunsmore Parish Council noted LTP4 Policy Position F1 to drive a mode shift of freight transport from road to rail.
- The Canal and River Trust noted the importance of canal towpaths for active travel.
- One resident stated that the problem wasn't the absence of policies but their under-enforcement.

Do you support a policy protecting stadia as community and sports facilities? If so, which stadia should we protect?

139 responses were received to this question.

110 supported a policy protecting stadia.

28 did not support a policy protecting stadia.

One other comment was received neither expressing opposition or support.

The following stadia were put forward for protection:

- Sports Connexion, Ryton
- Coventry City training facilities
- Coventry Stadium, Brandon
- The Queen's Diamond Jubilee Centre
- All school sports fields and rugby and football pitches
- The Rugby Football Club
- Golf courses
- Rugby Town FC, Butlin Road
- Rugby Borough Football Club
- Ashlawn Recreation Ground
- Rugby School
- Rugby Gymnastics Club
- Rugby Thornfield Indoor Bowls
- Old Laurentians

Summary of other comments:

- Two comments suggested the creation of a rugby stadium in Rugby. Another argues new stadia are needed.
- One objecting response from a developer argued that a specific policy would duplicate national policy on protecting community facilities.
- Save Coventry Speedway argued for restoration of Coventry Stadium for speedway and stock car racing, but also its use for low capacity community uses (such as a gym, climbing wall, cycle training track, mountain bike track, links to National Cycle Network) and a museum for speedway and stock car racing.

Appendix 1: press notice



RUGBY BOROUGH COUNCIL

**TOWN AND COUNTRY PLANNING
(LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012, SECTION 18**

Notice is hereby given of the publication of the Rugby Borough Council Local Plan Review Issues and Options for public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The public consultation will run between Monday 30 October 2023 and 5pm on Friday 2 February 2024.

The Issues and Options consultation document and supporting evidence will be available for inspection on the council's website:
www.rugby.gov.uk/localplan

In addition, hard copies are available for inspection at the following locations:

- Town Hall, Evreux Way, Rugby, CV12 2RR,
- Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ
- Dunchurch Community Library, The Green, Dunchurch, Rugby, CV22 6PA
- Wolston Library and Information Centre, Warwick Road, Wolston, Coventry, CV8 3GX.

Consultation responses can be submitted via:

- online consultation form at www.rugby.gov.uk/localplan
- email to localplan@rugby.gov.uk with 'Local Plan Review: Issues and Options' in the subject line
- post to Local Plan Review: Issues and Options, Development Strategy Team, Town Hall, Evreux Way, Rugby, CV21 2RR

If you wish to be kept informed about future stages of the local plan review, please state this in your consultation response.

Appendix 2: Consultation strategy

Rugby Borough Local Plan Review – Issues and Options

Public Consultation Strategy

Document Title: Rugby Borough Local Plan Issues and Options	
What we are doing, and why	
Nature of Plan being Prepared	This document is the first round of public consultation on the new Rugby Borough Local Plan.
Purpose of Consultation	The aim of this consultation is to ensure the wider public are aware of the review of the plan and give the public and other stakeholders an opportunity to submit representations.
Nature of issues that need to be consulted upon	There are a number of stages a plan must go through prior to adoption. This first stage is a broad consultation on the overall approach the new plan should take, including whether, and to what extent, we should review the plan at this time
Why we are consulting	<p>We are carrying out this consultation to ensure all individuals and groups who may be affected by or have an interest in the Local Plan have the opportunity to voice their opinions on whether and how to proceed, and what content should be considered if a full or partial review of the plan is progressed.</p> <p>Our ambition is therefore to publicise the consultation as widely as possible using all available tools at our disposal and going above and beyond the statutory requirements and even those identified in our Statement of Community Involvement.</p>
When consultation will take place	This consultation will run for eight weeks from Monday 30 October to Friday 22 nd December 2023.
How we will publicise the consultation	
Direct notifications	<p>In accordance with the Regulations and the council's Statement of Community Involvement the following groups will be notified directly of the consultation. This will be done by email where possible with letters sent to those for whom an email address is not available:</p> <ul style="list-style-type: none"> • all statutory consultation bodies; • all parish councils; and • all groups and individuals who have opted to be on the council's consultation database.
Direct engagement with Parish Councils	In addition to directly notifying Parish Councils, we will hold an event where three representatives of each parish council will have the opportunity to engage with officers and ask their questions.

	<p>We want to engage closely with Parish Councils in recognition of their unique understanding of their local communities, and the role many are playing in neighbourhood planning.</p>
Local publicity	<p>The consultation will be promoted in the following ways, in line with the council's Statement of Community Involvement:</p> <ul style="list-style-type: none"> • information and documents will be published on the council's website; • the consultation will be advertised in the local newspaper; and • paper copies of the documents will be available to view at the Town Hall, Rugby Library, Dunchurch Community Library and Wolston Library. <p>In addition to making consultation documents available at the above locations, a series of display boards will also be provided to draw further attention.</p> <p>We will also ask parish councils to publicise the consultation in their parish newsletters/magazines and on noticeboards.</p> <p>We will identify community and faith groups and contact them to let them know about the consultation.</p>
Use of digital technology	<p>We will promote the consultation via the Council's social media channels:</p> <ul style="list-style-type: none"> • Facebook • Twitter <p>We will work with the Communications team to schedule social media posts to coincide with the launch of the consultation, the mid-point, and a final reminder of the consultation deadline as a minimum.</p> <p>Social media may also be used to promote events (see below) scheduled through the consultation period, which will enable interested parties directly engage with officers to ask questions.</p> <p>We will also explore the potential to develop a short, animated video to explain in 2-3minutes what the consultation is and why it is important. Such videos have been used to some effect for both the Warwickshire Local Transport Plan, and the South Warwickshire Local Plan Issues and Options.</p> <p>The video may be shared via the following methods:</p> <ul style="list-style-type: none"> • On the Council website • Via the social media channels outlined above • At events (see below)
Events	<p>A series of events will be held to enable interested parties to obtain further information and have their questions answered.</p>

	<p>Some of these events will be in person, and some online. This provides different opportunities for individuals to engage directly with officers, allowing for different personal preferences, capacity to travel, and balancing such events with other commitments.</p> <p>Exact dates, times and locations are to be confirmed, but in outline the following is proposed:</p> <p>Online events (MS Teams)</p> <ul style="list-style-type: none"> • two open 1 hour events, at least one to be in the evening • A short (15minute) presentation from officers to outline the context, followed by 45-minute Q&A • Questions to be added in the chat function <p>In- person events</p> <ul style="list-style-type: none"> • Six in person events – drop-in sessions at Rugby town centre, Dunchurch, Wolston, Cawston, Brownsover, Wolvey
Engagement with the business community	The Senior Economic Development Officer will publicise the consultation with the Chamber of Commerce, Warwickshire Growth Hub and local businesses.
Accessible Inclusive Consultation	<p>As outlined above the consultation will be promoted both online and in the local newspaper and the document will be available to read both online or in hard copy form.</p> <p>In addition to this, to ensure the consultation is accessible and inclusive, the following measures will be put in place:</p> <ul style="list-style-type: none"> • Paper copies of the documents can be posted out to individuals upon request; • Individuals can call or email to discuss the document with a planning officer; • Adapted versions of the document can be produced on request, e.g. large print; • Representations can be submitted by email or post.
How comments will be taken into account	<p>Each representation will be read and carefully considered. Representations will be taken into account in the preparation of the new plan along with national policy and the evidence base.</p> <p>Before a plan can be adopted it must be examined in public by a planning inspector.</p>
How comments will be reported	<p>A consultation statement will be published following the close of the consultation. This will include:</p> <ul style="list-style-type: none"> • a list of the persons consulted; • a summary of each representation; and • a comment on how each representation has been considered.

Appendix 2 – Preferred Options Communication Plan

Draft Communications Plan – Local Plan Preferred Options Consultation

Key Messages

The key messages to be communicated:

1. We want you to have your say
2. How to have your say
3. What the preferred development strategy is and how it has been arrived at
4. Why we think the preferred development strategy is the best option

Communication

The table below outlines key elements of the draft communications plan for the Preferred Options consultation.

Key messages 1 and 2 will transcend across the range of communication methods, and follow both our statutory requirements and the commitments in the Statement of Community Involvement (SCI).

Key messages 3 and 4 will be the focus of the video, leaflets, and materials produced to support events. They will also form part of the overall social media strategy.

Communication type	Objective of communication	Medium	When?	Notes
Consultation launch and general awareness				
Press release	General awareness that consultation is happening	RBC website Local media (print and online)	At beginning of consultation	Development Strategy to liaise with communications team
Press notice	General awareness that consultation is happening	Rugby Observer	w/c 24March	Press notice drafted.
Emails and letters to the Development Strategy Consultation database	General awareness of the consultation to those who have registered interest and to statutory bodies	Emails Letters	At the beginning of the consultation – 24 March	
RBC web pages	To provide information on the consultation, including: <ul style="list-style-type: none"> • The Preferred Option Plan • How to respond to 	RBC website	To be maintained throughout the consultation period and beyond	Upload of information discussed with communications officers

Communication type	Objective of communication	Medium	When?	Notes
	<p>the consultation (including online survey link as an option to respond)</p> <ul style="list-style-type: none"> • Links to evidence base documents • FAQs • Schedule of events (see below) • Video (see below) 			
Survey Monkey online survey	Primarily a method of feeding back regarding the consultation, though an ‘executive summary’ of key information will precede the consultation questions.	RBC website	To remain available throughout the consultation	Receiving responses in this format makes the consideration of responses more efficient, and often more effective as it is clear what the ‘answer’ relates to.
Social media	<p>Sharing key information throughout the consultation to seek to engage local residents, including:</p> <ul style="list-style-type: none"> • Consultation launch • Animated video – the development strategy (see below) • Advertising events/event reminders • Policy themes (i.e based on sections of the draft plan) 	Facebook Instagram LinkedIn X	A social media strategy and schedule is in development. Posts will be made regularly throughout the consultation.	Social media plan in preparation. It will aim to present different information to appeal to different sections of the audience.
Video (animated)	To succinctly explain (circa 2-3 minutes	RBC website	To be uploaded to	Scripted by Development

Communication type	Objective of communication	Medium	When?	Notes
	maximum) the stage of plan preparation, introduce the preferred development strategy (using the key diagram) and set out why it is the preferred strategy.	RBC Social media	the website at the beginning of the consultation and shared on social media	Strategy and animation arranged by Communications team.
Leaflets	To summarise the development strategy (using the key diagram), and set out why it is the preferred strategy	Print - to be provided at drop-in events (see below), and available at other locations, including local libraries and the town hall.	Throughout the consultation	QR code will allow direct navigation to the relevant RBC web page.
Hard copy access	In line with the requirements of the SCI, hard copies of consultation information to be supplied to local libraries and the Town Hall. This provides an alternative to online material.	Print	To be placed in these locations ahead of the consultation.	Dunchurch library is closed on Mondays. Wolston library is open 10.30-1 on Fridays and 2.30-5 on Mondays.
Events				
All RBC Councillor briefing	Briefing to councillors	In person	25 March 2025 – 6pm	Briefing to be held in the Benn Hall. Invitations have been sent
Parish Council briefing	Briefing for representatives of all parish councils in the borough	In person	TBC – w/c 24 March	Venue tbc – likely Benn Hall
In person drop-in sessions hosted by officers in	To allow local residents to pose questions and find out more about the	In person	x7 drop-in sessions be scheduled throughout	Locations identified (based on the spatial strategy):

Communication type	Objective of communication	Medium	When?	Notes
locations across the borough	content of the draft plan. This aims to help residents make informed consultation responses.		<p>the consultation period, but specifically avoiding the two week Easter school holiday (14-25 April).</p> <p>Times tbc, but exploring venue availability for 6-8pm in each location.</p> <p>Local residents can drop-in at any point in the session, and do not need to stay for the duration.</p>	<ul style="list-style-type: none"> • Brinklow • Clifton upon Dunsmore • Dunchurch • Long Lawford • Rugby (town centre) • Ryton or Stretton • Wolvey <p>Printed display information will be available to view and discuss, plus leaflets (see above) available to take way. All will include QR codes so attendees can link to further information on their mobile devices.</p>
Public online information sessions	To provide a summary of key information at the beginning, followed by a Q&A with officers	Online - Teams	TBC – will seek to hold at different times of day.	Propose a format where questions are posed in the chat, and officers.
Advertising events				
Posters	To advertise in person events – dates, times, locations	Print Social media	At the beginning of the consultation period	<p>The use of posters (both physically and via social media proved very effective in the Issues and Options consultation.</p> <p>Propose some posters with the full list of events, plus</p>

Communication type	Objective of communication	Medium	When?	Notes
				each event will have its own poster, that will be shared with the relevant parish council. Print copies can be placed on Parish noticeboards, and virtual copies have potential to be shared via local web pages and social media accounts.
Facebook events	To create the in person drop in events as 'Facebook events', to further promote them to local residents. It may also assist in gauging the level of interest in the event.	Social media	When scheduled	Communications team has used this approach before, and are exploring the best way(s) to share the events – potentially based on a local geography &/or by sharing the event into known local community groups.
Sharing the link for online events	To raise awareness of the opportunity to join an online Q&A event.	RBC website RBC social media	When scheduled	

Appendix 3 – Preferred Option Press Notice



RUGBY BOROUGH COUNCIL

**TOWN AND COUNTRY
PLANNING (LOCAL
PLANNING) (ENGLAND)
REGULATIONS 2012,
SECTION 18**

Notice is hereby given of the publication of the Rugby Borough Council Preferred Option Consultation Document for public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The public consultation will run from Monday 24 March 2025 to 5pm on Monday 19 May 2025.

The Preferred Option Consultation Document and supporting evidence is available for inspection on the council's website:
www.rugby.gov.uk/localplan

In addition, hard copies are available for inspection at the following locations:

- Rugby Borough Council's offices, Town Hall, Evreux Way, Rugby, CV12 2RR,
- Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ
- Dunchurch Community Library, The Green, Dunchurch, Rugby, CV22 6PA
- Wolston Library and Information Centre, Warwick Road, Wolston, CV8 3GX.

Consultation responses can be submitted via the online questionnaire at www.rugby.gov.uk/localplan, by email to localplan@rugby.gov.uk (put 'Preferred Option Consultation' in the subject line) or by post to: Preferred Option Consultation, Development Strategy Team, Town Hall, Evreux Way, Rugby, CV21 2RR.

If you wish to be kept informed about future stages of the local plan review, please state this in your consultation response.

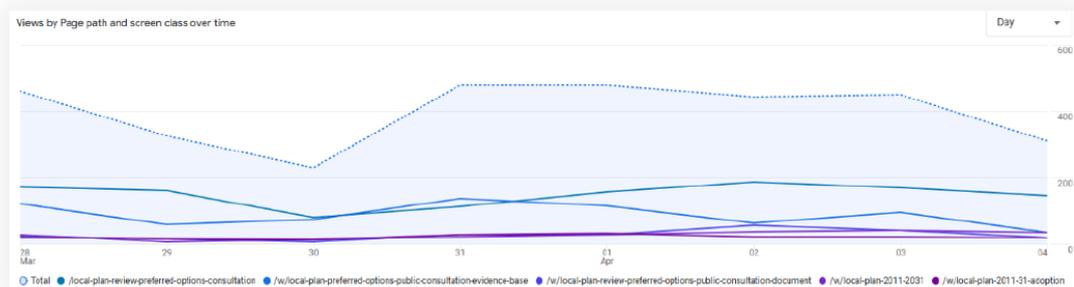
Consultation responses will be made available for public inspection.

Appendix 4 – Preferred Options Social Media Analytics



(28 March – 4 April)

Website traffic



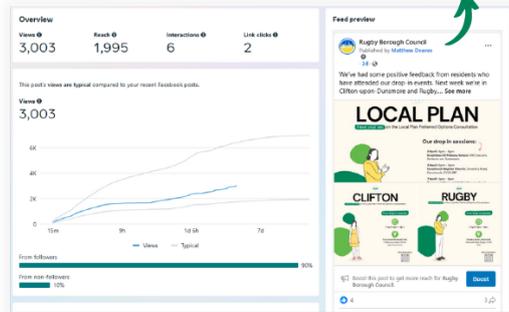
- local-plan-review-preferred-options-consultation - 1,181
- local-plan-review-preferred-options-consultation-evidence-base - 700
- local-plan-review-preferred-options-public-consultation-document - 222

Social media

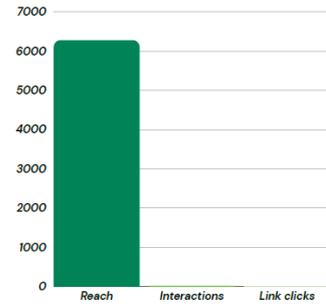
Insight into our social media and key metrics.

Top post

Shorter captions to improve interactions?



Weekly overview

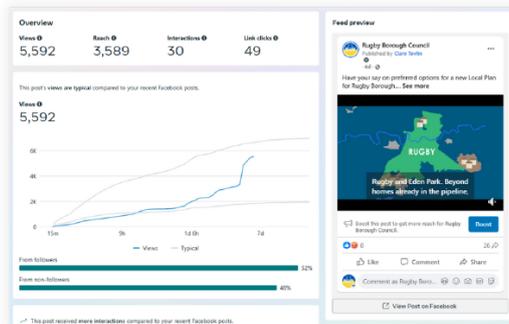


Notes:

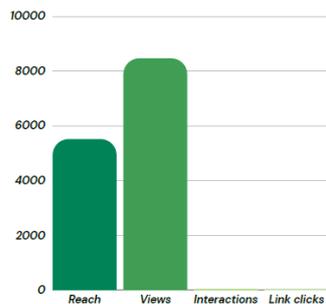
Like most social media platforms, the reach is always better than the impressions and link clicks (the first posts have gotten a similar result). The website traffic still has high numbers and will hopefully increase with the social media reach.

Video content

Top post



Weekly overview



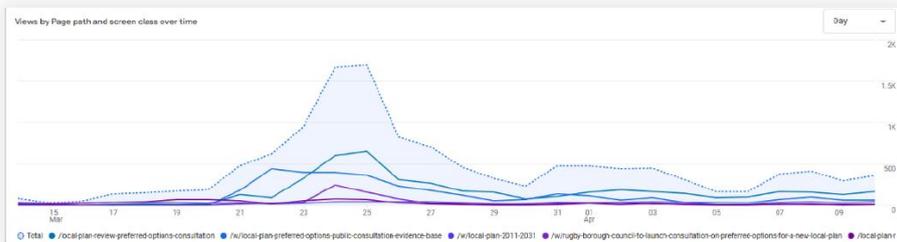
Notes:

Video formats seem to be getting better results, especially with interactions and link clicks. The top post was the 1 minute 'overview' clip, potentially a lot more digestible to the audience. Potential to use some paid adverts soon.

Week 2

(4 April – 11 April)

Website traffic



- local-plan-review-preferred-options-consultation - 4,425
- local-plan-review-preferred-options-consultation-evidence-base - 3,246
- local-plan-2011-2031 - 777

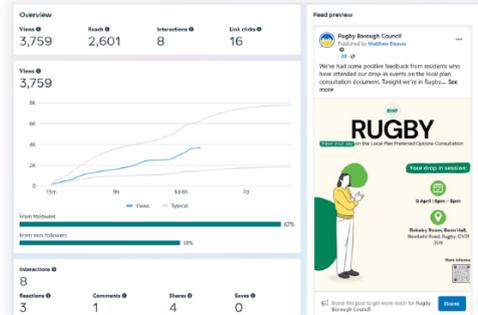
Resources used:

- Social media
- Paid socials
- Posters
- Videos
- Reels
- Screen graphics
- Landing page
- QRs

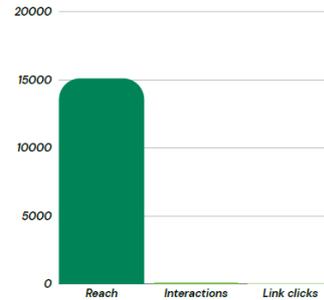
Social media

Insight into our social media and key metrics.

Top post



Weekly overview

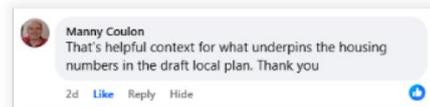
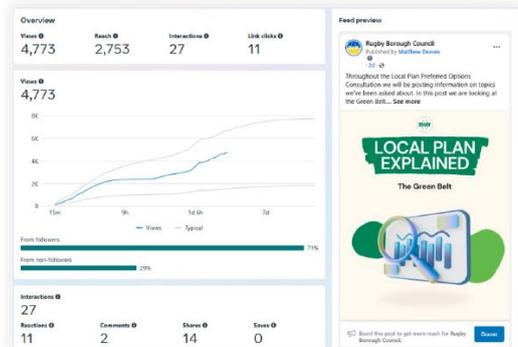


Notes:

Like most social media platforms, the reach is always better than the impressions and link clicks (the first posts have gotten a similar result). The website traffic still has high numbers and will hopefully increase with the social media reach.

Analytical posts

Top post



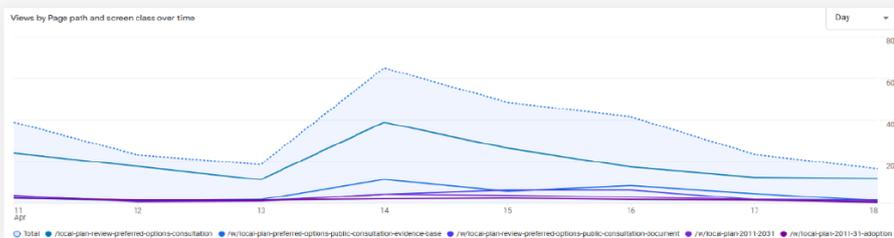
Notes:

To better explain the Local Plan, we created analytical graphics to dive into each topic in more depth. This gained some good traction, a comment was left under this post too.

Week 3

(11 April – 18 April)

Website traffic



- local-plan-review-preferred-options-consultation - 1,603
- local-plan-review-preferred-options-public-consultation-evidence-base - 364
- local-plan-review-preferred-options-public-consultation-document - 257

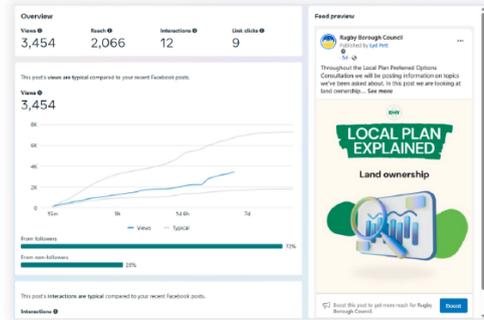
Resources used:

- Social media
- Paid socials
- Posters
- Videos
- Reels
- Screen graphics
- Landing page
- QRs

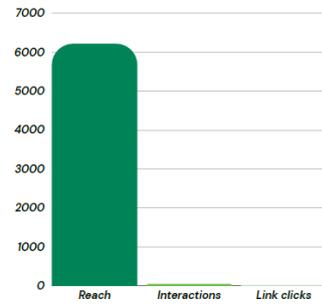
Social media

Insight into our social media and key metrics.

Top post



Weekly overview

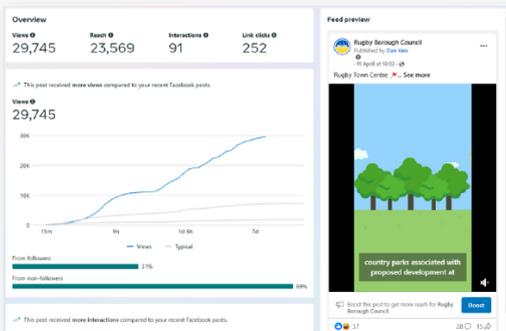


Notes:

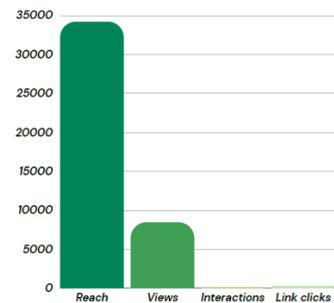
Following a pretty high spike last week (with the web traffic), the social media activity has remained relatively similar. The deeper insight posts appear to be useful to some of the residents.

Video content

Top post



Weekly overview



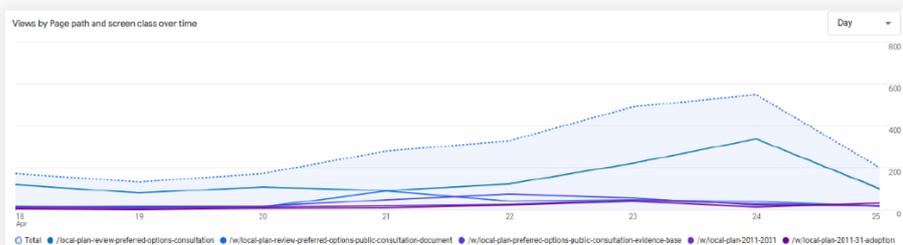
Notes:

The effectiveness for the video content is showing here, for the second time, the link clicks have been higher than the interactions. I'd advise to keep using these and change the content of the wording.

Week 4

(18 April – 25 April)

Website traffic



- local-plan-review-preferred-options-consultation - 1,171
- local-plan-review-preferred-options-consultation-evidence-base - 254
- local-plan-review-preferred-options-consultation-document - 262

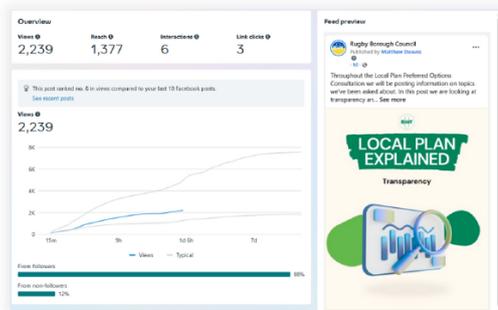
Resources used:

- Social media
- Paid socials
- Posters
- Videos
- Reels
- Screen graphics
- Landing page
- QRs

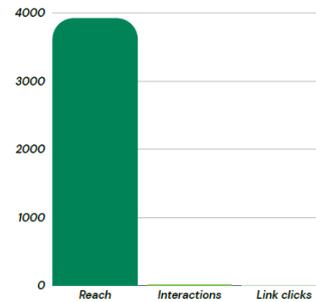
Social media

Insight into our social media and key metrics.

Top post



Weekly overview

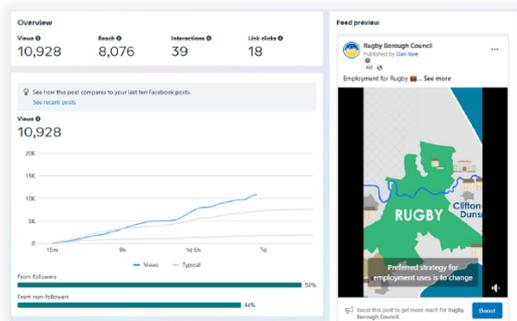


Notes:

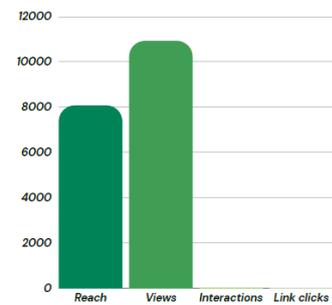
The posts are slowly levelling out, which is understandable for users who are seeing a local plan post every few days. Could be conversations to streamline the insightful content sent by Planning, shortening text, adding emojis to hammer home the main points (suited for social media)

Video content

Top post



Weekly overview



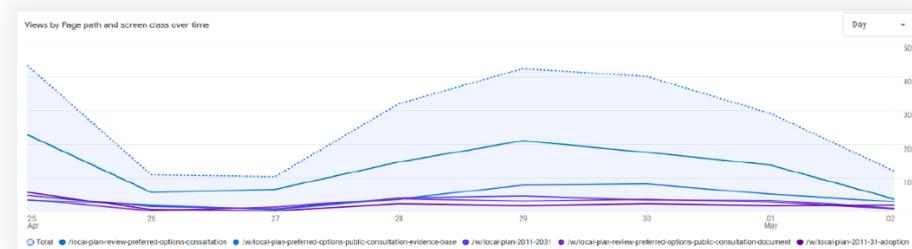
Notes:

Easing off the video content last week, to make use of the analytical posts, we wanted to slowly drip them back into the content. It seems like they're still the most digestible content for the users.

Week 5

(25 April – 2 May)

Website traffic



- local-plan-review-preferred-options-consultation - 1,056
- local-plan-review-preferred-options-consultation-evidence-base - 334
- local-plan-review-preferred-options-consultation-document - 189

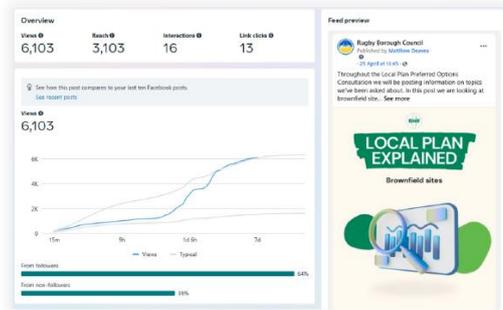
Resources used:

- Social media
- Posters
- Videos
- Reels
- Screen graphics
- Landing page
- QRs

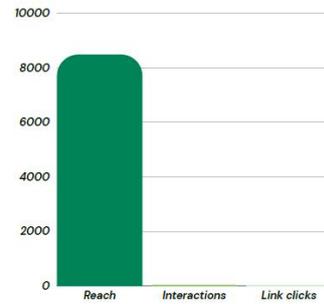
Social media

Insight into our social media and key metrics.

Top post



Weekly overview



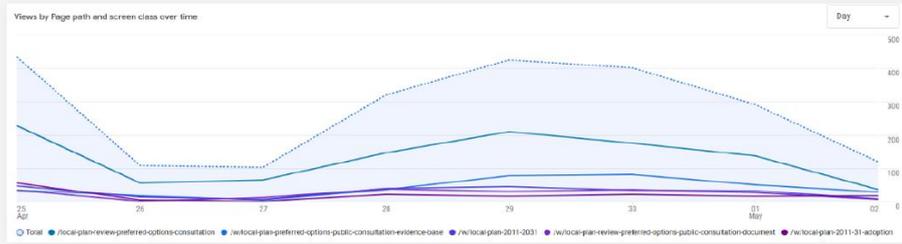
Notes:

Extra posts went out on our socials this week to promote the new Local Plan consultation drop-in events

Week 6

(2 May – 9 May)

Website traffic



- local-plan-review-preferred-options-consultation - 908
- local-plan-review-preferred-options-consultation-evidence-base - 472
- local-plan-review-preferred-options-consultation-document - 177

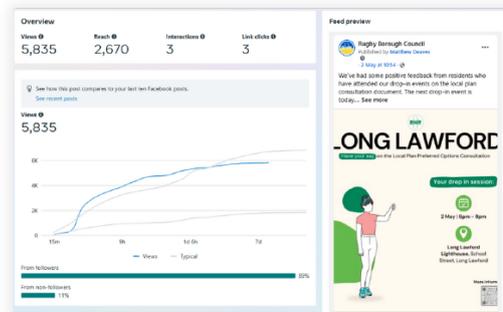
Resources used:

- Social media
- Posters
- Videos
- Reels
- Screen graphics
- Landing page
- QRs

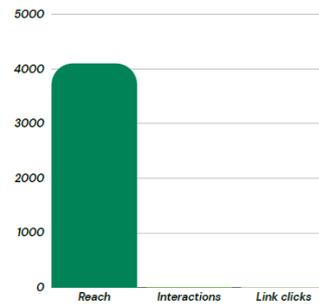
Social media

Insight into our social media and key metrics.

Top post



Weekly overview



Notes:

With the drop-in event just around the corner, we wanted to give it a final push for Long Lawford residents. Posting slowed down this week due to the election period.

Appendix 5 – Preferred Option Leaflet

Preferred Option Consultation



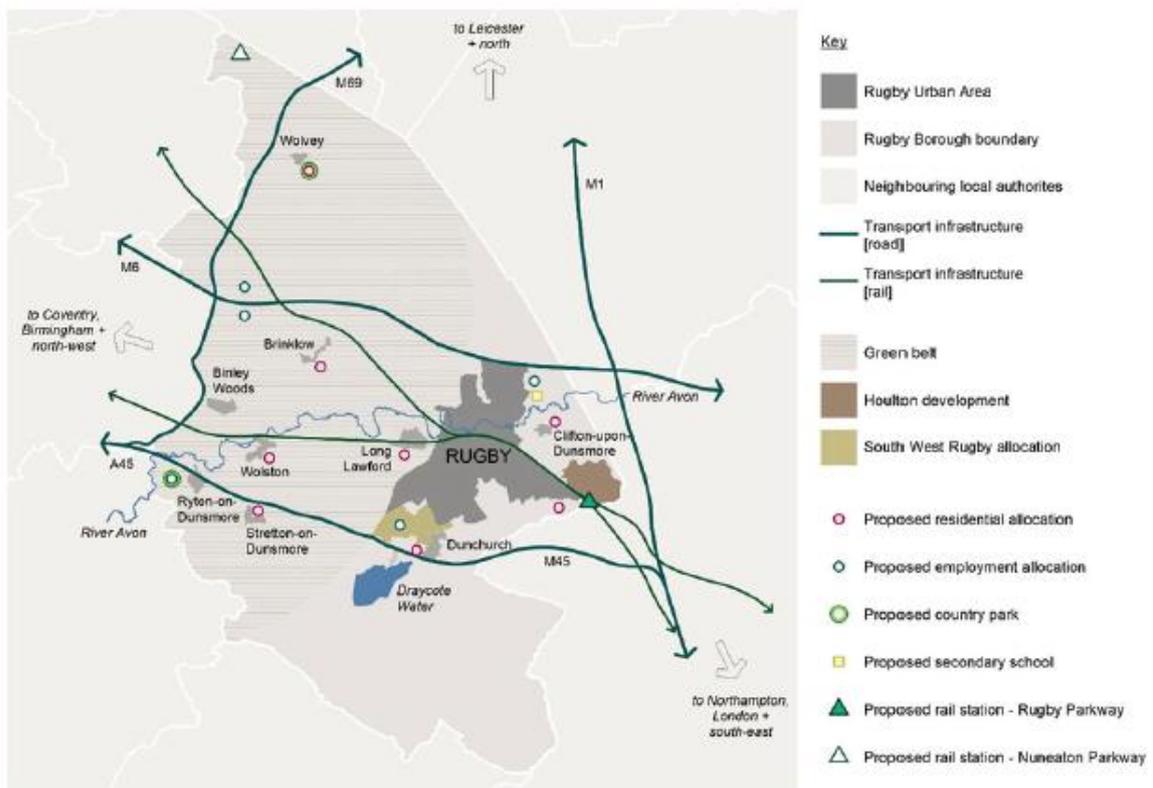
The Preferred Option Consultation Document has been shaped by

- Your feedback on the issues and options consultation (October 2023 - February 2024).
- Land submitted to us through the call for sites (October 2023 - February 2024) or identified through other means.
- Changes to the National Planning Policy Framework (NPPF), the latest being December 2024.
- New technical evidence on a range of topics – a full list is available at rugby.gov.uk/localplan



The development strategy

The development strategy sets out what types of development and land uses should be located where. The preferred option strategy is summarised on the key diagram below:





Key points

- Much of the housing needed for the new plan period up to 2045 already has planning permission or was allocated in the plan adopted in 2019. This includes new homes at Houlton, South West Rugby and Eden Park.
- Additional land is needed for around a further 3,500 homes. Small and medium sized sites have been identified on the edge of Rugby and at larger villages.
- Multiple employment sites have been identified with a range of employment types accommodated. These are located close to the workforces present in Rugby and Coventry.
- A site for a new secondary school is identified north-east of Rugby.
- Two new country parks are identified alongside proposed development allocations - one at Wolvey and one at Ryton-on-Dunsmore.
- The consultation document includes ambitious policies on climate change, including net zero carbon buildings, water efficiency standards, and tree canopy cover.
- The consultation document makes new allocations for Gypsy and Traveller pitches to reduce unauthorised encampments.
- Policies to support the regeneration of Rugby town centre are included.

How to have your say

Rugby Borough Council is consulting on the Preferred Option local plan from 24 March 2025 until 5pm on 19 May 2025.

A copy of the draft plan, and related evidence is available online at: rugby.gov.uk/localplan

Here, you will also be able to complete an online questionnaire.



Hard copies of the draft plan are also available to view at:

- Rugby Borough Council's offices, Town Hall, Evreux Way, Rugby, CV12 2RR
- Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ
- Dunchurch Community Library, The Green, Dunchurch, Rugby, CV22 6PA
- Wolston Library, Warwick Road, Wolston CV8 3GX

Appendix 6 – Preferred Option Questionnaire

Questionnaire on Rugby Borough Council’s Preferred Option Consultation Document

The purpose of this questionnaire is to gather feedback on the ‘Preferred Option’ Consultation Document produced by Rugby Borough Council.

The consultation document sets out planning policies and proposals for the period of 2024 to 2045. These are intended to contribute to the achievement of the Council’s vision for a healthier, thriving, greener and fairer Rugby Borough. The document covers many topics including:

- Where housing should be built.
- Which land can be used to provide employment.
- How the need for infrastructure, such as schools, green spaces, and transport connections, will be met.
- How the Borough will mitigate and adapt to climate change.

The document has been informed by a prior public consultation on key issues and options conducted in October 2023 to February 2024, information submitted by landowners and their agents in response to a call for sites, and a wide range of evidence gathered by the Council’s planning team. Feedback gathered through this questionnaire will help shape the document before another public consultation is conducted in January 2026.

Before completing the questionnaire, please review the consultation document and policies map. You may also find it helpful to refer to our FAQ document or consider the accompanying evidence. Hard copies of the consultation document have been deposited at the Borough’s libraries, while the rest of the supporting information is available on our website at rugby.gov.uk/localplan

The questionnaire contains a total of 27 questions about the consultation document, and 11 questions about the characteristics of the respondent. Although we encourage respondents to consider the consultation document in a holistic manner, we appreciate that some may wish to skip certain questions and focus only on specific elements that are of particular interest to them.

Please return completed questionnaires to the Council by email to: localplan@rugby.gov.uk, or by post to:

Preferred Option Consultation,
Development Strategy Team,
Rugby Borough Council ,
Town Hall,
Evreux Way,

Objectives

The consultation document has six main objectives:

1. Support the diversification and growth in sustainable locations of Rugby Borough's economy in line with the Economic Strategy
2. Support the revival of Rugby town centre
3. Reduce emissions and adapt to climate change
4. Raise design standards
5. Deliver infrastructure-led growth
6. Facilitate a greener, more biodiverse borough and deliver new country parks

Question 1	To what extent do you agree with the selection of these objectives?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 2	What are the reasons for your answer to question 1?

Strategy for homes and residential allocations (policies S2 and S6)

The number of homes we need to plan for is determined by the standard methodology set by central government. Many of the homes we need to plan for in the period 2024-2045 already have planning permission or are allocated through Houlton, South West Rugby and Eden Park.

However, in addition to these, we will need to allocate land for around 3,500 additional homes.

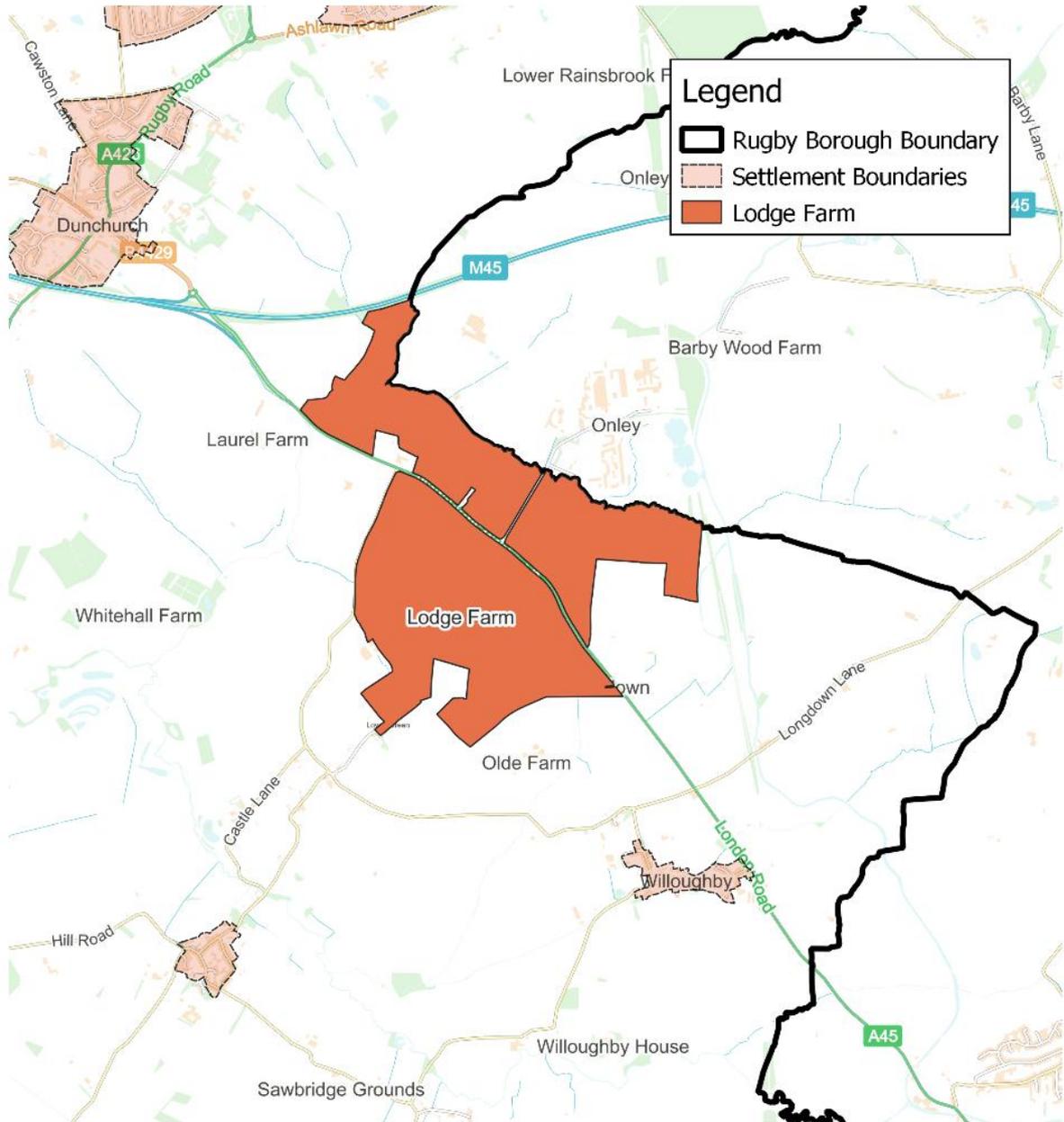
The proposed spatial strategy for delivering those additional homes includes a range of small to medium-sized sites. The Rugby urban area remains the principal focus for new housing where, including existing commitments, around 75% of new homes are to be delivered. However, the consultation document also proposes residential sites across most of the larger villages with Wolvey, Long Lawford and Brinklow having the largest number of proposed homes.

This more dispersed strategy, which avoids allocating very large sites, was chosen for several reasons:

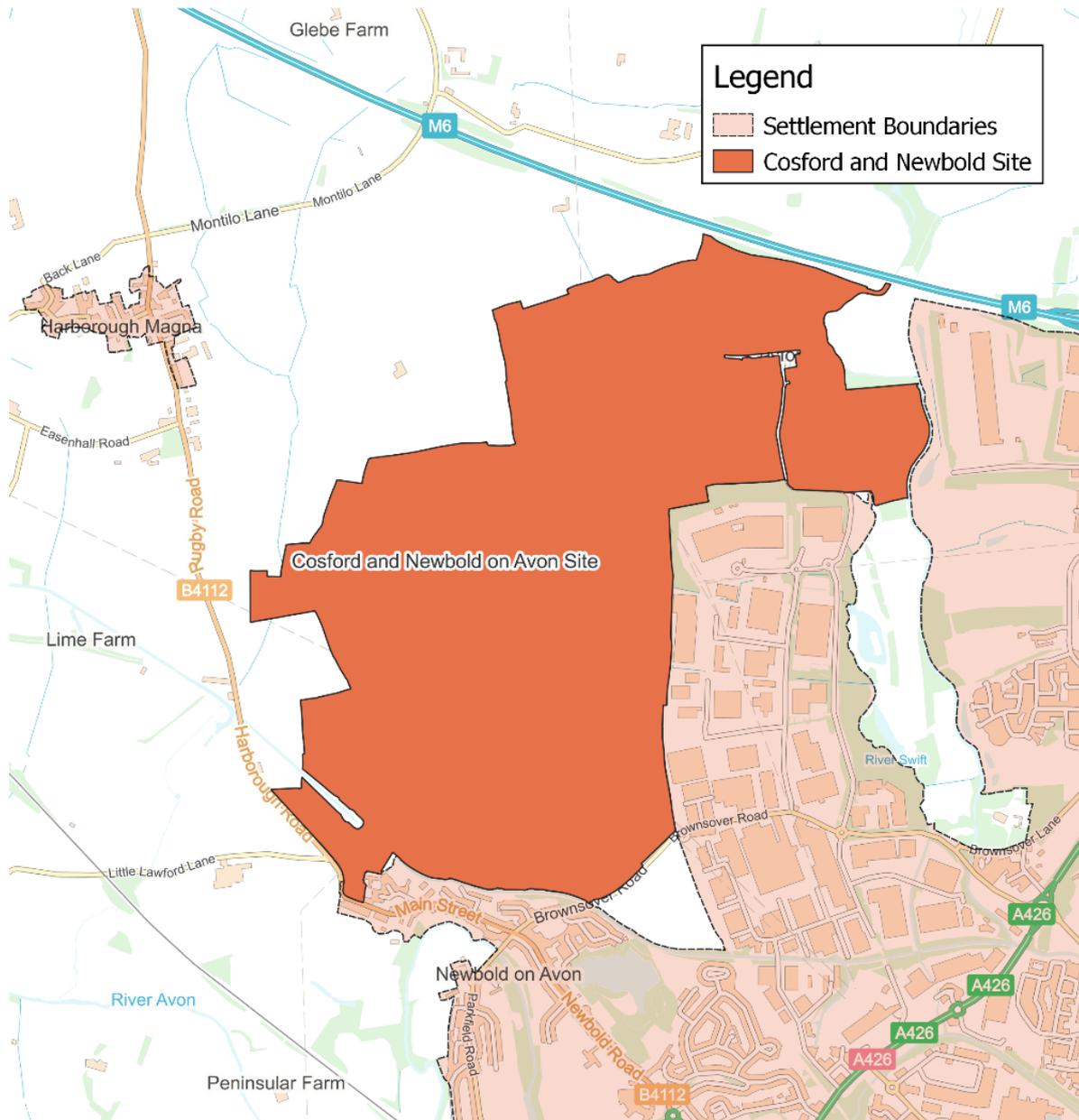
- By having a range of smaller sites, that will come forward quickly and offer opportunities for small to medium housebuilders, the borough can avoid an over reliance on large sites (i.e. having ‘all eggs in one basket’).
- While large urban extensions to Rugby town (Houlton, Eden Park and South West Rugby) are being delivered, a strategy that placed further infrastructure strain on the town was deemed unfavourable.
- A strategy focused on small and medium sites is likely to deliver proportionately more affordable housing more quickly.
- The large sites put forward have significant concerns relating to their traffic impacts and their ability to fund necessary infrastructure, thereby making their deliverability uncertain.
- There are opportunities to utilise existing infrastructure in villages where school rolls are dwindling and to improve the range of facilities in villages, enhancing their sustainability.

The alternatives to the preferred option are detailed in the interim Sustainability Appraisal Report. The main alternatives would include a further large site, together with somewhat reduced numbers of smaller and medium sites. Based on an assessment of the land which has been put forward to the Council by landowners and their agents, two main options for large sites have been identified.

The first alternative option would be to allocate land at Lodge Farm, southeast of Dunchurch, for a new village to be built. The estimated range of dwellings to be delivered here would be between 1,800 and 2,000 homes by 2045, with further homes thereafter.



The second alternative would be to allocate land at Cosford, to the north of Newbold-on-Avon and north and west of Swift Valley industrial estate. It is estimated that this site could deliver 1,800 to 2,000 homes by 2045 with further homes thereafter.



When answering the following two questions, we would encourage respondents to weigh up the proposed strategy against the main alternatives of delivering housing through another very large site together with a somewhat reduced number of smaller and medium sized sites. This question asks about the proposed overall strategy, not specific sites, which are covered by questions 5 and 6.

Question 3	To what extent do you agree with the more dispersed overall spatial strategy for new homes?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 4	What are the reasons for your answer to question 3 and if you disagree with the proposed spatial strategy what alternative should we pursue?

Questions 5 and 6 ask about the residential allocations in policy S6, about which more detail is provided in the development site allocations annex.

Question 5	Is there a site that is proposed to be allocated for housing in policy S6 that you do not support? If so, which site and why?

Question 6	The development sites annex lists development requirements for the allocated sites. Are there additional or different requirements we should be seeking? Please specify which site you are referring to.

Strategy for employment land and employment allocations (policies S3 and S7)

The spatial strategy for employment land proposes five new employment land allocations:

- At Coton Park east, on land which was allocated for residential development in the Local Plan 2011-2031 but which hasn't come forward and is considered more suitable for employment development.
- Within the South West Rugby site as a second phase north of the new Symmetry Park.
- As a northern extension to Ansty Park.
- South of the village of Ansty near M6 Junction 2 (there was recently a resolution to grant planning permission for an employment campus on this land, to be developed by Frasers Group).
- At Ryton-on-Dunsmore between Prologis Park (formerly Peugeot) and Coventry Airport.

In summary, we have selected these sites because:

- They are expansions to or are well-related to existing successful employment areas and major road links.
- They are close to the main centres of population in Coventry and Rugby, reducing commuting distances.
- They offer opportunities for diversification of the economy, a range of different scales of building and the delivery of other benefits including country parks/public open space and training facilities.

The sustainability appraisal highlights alternative locations. Some of the main alternatives considered were on the A5 south of Magna Park, on the A5 north of Houlton, and around Thurlaston south of Rugby. A further option would be greater dispersal to smaller sites in the rural areas.

Question 7	To what extent do you agree with the strategy for employment land?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 8	What are the reasons for your answer to question 7? If you disagree, what alternative location(s) would be better and why?
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Gypsy and Traveller sites (policy S4)

We are required to assess the need for pitches for Gypsies and Travellers and allocate land to meet this need. Policy S4 identifies sites that can meet some of the assessed need. We will continue to look for options to meet the remaining need, including by asking our neighbouring authorities to help.

Question 9	To what extent do you agree with policy S4?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 10	What are the reasons for your answer to question 9?

Climate

The consultation document contains four policies that are focused on reducing greenhouse gas emissions and adapting to the effects of climate change. In summary, important proposed policy changes are as follows:

- New buildings must be designed and built to be net zero carbon in operation (policy CL1).
- More support for renewable and low carbon energy infrastructure including identifying areas as suitable for wind turbines on the policies map and supporting wind turbines on employment sites (policy CL2).
- Introducing water use efficiency standards for non-residential development (policy CL3).
- Putting into policy a requirement for developments to adapt to the effects of climate change by being designed to minimise overheating, minimise flood risk, and optimise green space to provide urban cooling (policy CL4).

Question 11	To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 12	What are the reasons for your answer to question 11?

Economy

The consultation document contains three policies that relate to the topic of the Borough's economy. In summary, they are as follows:

- Land within Strategic Employment Sites, sites allocated for employment use development in the plan, and land designated for employment use within made neighbourhood plans, shall be retained for employment purposes. Changes to non-employment uses shall only be permitted where employment uses are proven to be unviable (policy E1).
- Outside the areas mentioned above, development of employment uses shall be permitted within settlement boundaries and in the countryside through conversions of buildings, proportionate expansion of buildings in employment use or infilling within existing employment sites (policy E2).
- Certain uses that support the rural economy (such as agricultural buildings, small-scale tourist accommodation, and garden centres and nurseries) shall be accepted within rural areas, subject to their compliance with other policies including Green Belt policy (policy E3).

Question 13	To what extent do you agree with the document's economic policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 14	What are the reasons for your answer to question 13?

Centres

The consultation document specifies a hierarchy which will direct the development of retail uses in the Borough. A ‘town centre first policy’ is maintained, with Rugby town centre at the top of the hierarchy, after which retail development is directed to the district centres and local centres, as defined below.

<p>Town Centre The principal centre in the Borough as defined on the policies map. The town centre is the main shopping and leisure location in the authority area serving the needs of those from across the Borough and beyond.</p>	<p>Rugby town centre</p>
<p>District Centres Areas comprising substantial concentrations of units with retail, leisure and community uses that act as secondary locations to the town centre serving large districts of the Borough. They typically include at least one large-format supermarket or superstore which attracts a high volume of visitors, a range of comparison retailers, and community facilities such as a school or community centre.</p>	<p>Houlton, South West Rugby</p>
<p>Local Centres Areas which include a wide range of units with retail, leisure and community uses that serve the day-to-day needs of a local catchment population which is within walking distance. They typically include a convenience store, Post Office, pharmacy, school and a place for community gatherings (community centre, pub, place of worship etc.), and have good public transport connections to the principal Town Centre.</p>	<p>Benn, Bilton, Brownsover, Dunchurch, Hillmorton, Houlton, Eden Park</p>

The two district centres (Houlton and South West Rugby) and one of the local centres (Eden Park) are yet to be built out, but are designated as per the proposed masterplans for these urban extensions. The other local centres have been chosen based on an assessment of locations nominated by respondents to our prior Issues & Options consultation, and locations identified by Councillors and Council Officers.

Below the retail hierarchy 19 ‘neighbourhood hubs’ have been designated. These are locations with small concentrations of units with retail, leisure and community uses that are of importance to a neighbourhood, but which are not fully capable of meeting all essential day-to-day needs. They complement the retail hierarchy by giving people access to local shops and services within walking distance.

There are four policies relating to the Borough’s centres. In summary, these are as follows:

- Support is given for the regeneration of the town centre with specific priorities identified, including the redevelopment of Rugby Central Shopping Centre, a refreshed Market Place square, a new mixed-use hub at Old Market Place, and a new apartment living quarter surrounding Rugby Station (policy C1).
- Permission for development of new main town centre uses (such as retail, leisure, entertainment and office uses) is restricted to the centres identified in the retail hierarchy, except under specific circumstances (policy C2).
- Existing main town centre uses within defined centres are protected (policy C3).
- The provision of commercial, business, service, learning and local community uses within neighbourhood hubs is supported (policy C4).

Question 15	To what extent do you agree with the policies for retail centres?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 16	What are the reasons for your answer to question 15?

Environment

The consultation document contains eight policies that are focused on protecting or enhancing the environment of the Borough. In summary, these are:

- Sites designated as being of importance for wildlife shall be protected from adverse effects of development (policy EN1).
- Development shall avoid significant adverse impacts on the character and visual amenity of landscapes (policy EN2).
- A greater degree of protection is afforded to the ‘Ironstone Fringe Area of High Landscape Value’ centred around Flecknoe in the south of the Borough (policy EN3).
- Most developments shall deliver a net gain in biodiversity of at least 10% and this should be focused on site, close to the site or elsewhere within the borough. (policy EN4).
- All major developments shall increase their canopy cover to at least 20% of the site area, or retain their existing level of canopy cover, if already above 20% (policy EN5).
- Development will be steered towards areas with the lowest probability of flooding (policy EN6).
- Development shall not cause or be affected by unacceptable harm to human health, living conditions or the natural environment through pollution, contamination or instability (policy EN7).
- Any developments within the Air Quality Management Area, or any major developments anywhere in the Borough, must achieve air quality neutral standards and reduce exposure of occupiers to poor air quality caused by traffic (policy EN8).

Question 17	To what extent do you agree with the document’s environmental policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 18	What are the reasons for your answer to question 17?

Housing

The consultation document contains eight policies that are focused on the development of housing. In summary, these are:

- New developments shall contain a mix of housing tenures, types and sizes (policy H1).
- Where ten or more homes are being built, at least 20% shall be affordable housing within the Rugby urban area, and 30% outside the urban area (policy H2).
- New dwellings for rural workers in countryside locations shall be permitted where there is an essential need for workers to live near their place of work and existing accommodation is not available locally (policy H3).
- Small sites for affordable housing shall be permitted on sites adjacent to settlements, including in the Green Belt, where there is a demonstratable need and they comply with other policies (policy H4).
- The size of replacement dwellings outside of settlement boundaries are restricted (policy H5).
- The provision of housing for older people and those with disabilities is supported, and the loss of such housing shall be resisted unless it can be demonstrated that there is no longer a need for the homes (policy H6).
- New minimum space standards, including the provision of private outdoor space, are applied to new homes to ensure they are of an adequate size for future residents (policy H7).
- The number and concentration of Houses in Multiple Occupation (HMOs) are restricted to limit their potential negative effects (policy H8).

Question 19	To what extent do you agree with the document's housing policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 20	What are the reasons for your answer to question 19?

Wellbeing

The consultation document contains two policies that are focused on promoting the wellbeing of residents. In summary, these are:

- Protection is afforded to community facilities such as pubs, libraries and community halls. Changes to the use of such sites shall be resisted, except where alternative provision is available or retention of the existing use is proven to be unviable. The policy outlines the council's support for the restoration of Coventry Stadium, Brandon for speedway, stock car racing and other motor sports (policy W1).
- Open space shall be protected in accordance with national policy, and developments of 10 or more homes shall provide or contribute to the provision and maintenance of open space in line with set standards (policy W2).

Question 21	To what extent do you agree with the document's wellbeing policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 22	What are the reasons for your answer to question 21?

Design

The consultation document contains five policies that are focused on the design of new developments. In summary, these are:

- New development shall create or contribute to well-designed places by complying with ten design principles (policy D1).
- Infill and householder development shall incorporate features of the street scene so that it appears cohesive. Extensions and alterations shall be subject to further restrictions seeking to ensure they are of a high-quality design (policy D2).
- Development shall adhere to principles intended to ensure that landscape design delivers greener spaces that are resilient to climate change, support biodiversity, encourage active travel and support wellbeing (policy D3).
- Development that sustains and enhances the Borough's heritage assets will be supported and national policy shall be applied when considering proposals which have the potential to affect the significance of a heritage asset (policy D4).
- All developments that create the need for surface water drainage shall include Sustainable Drainage Systems for the management of surface water run-off, unless proven to be inappropriate (policy D5).

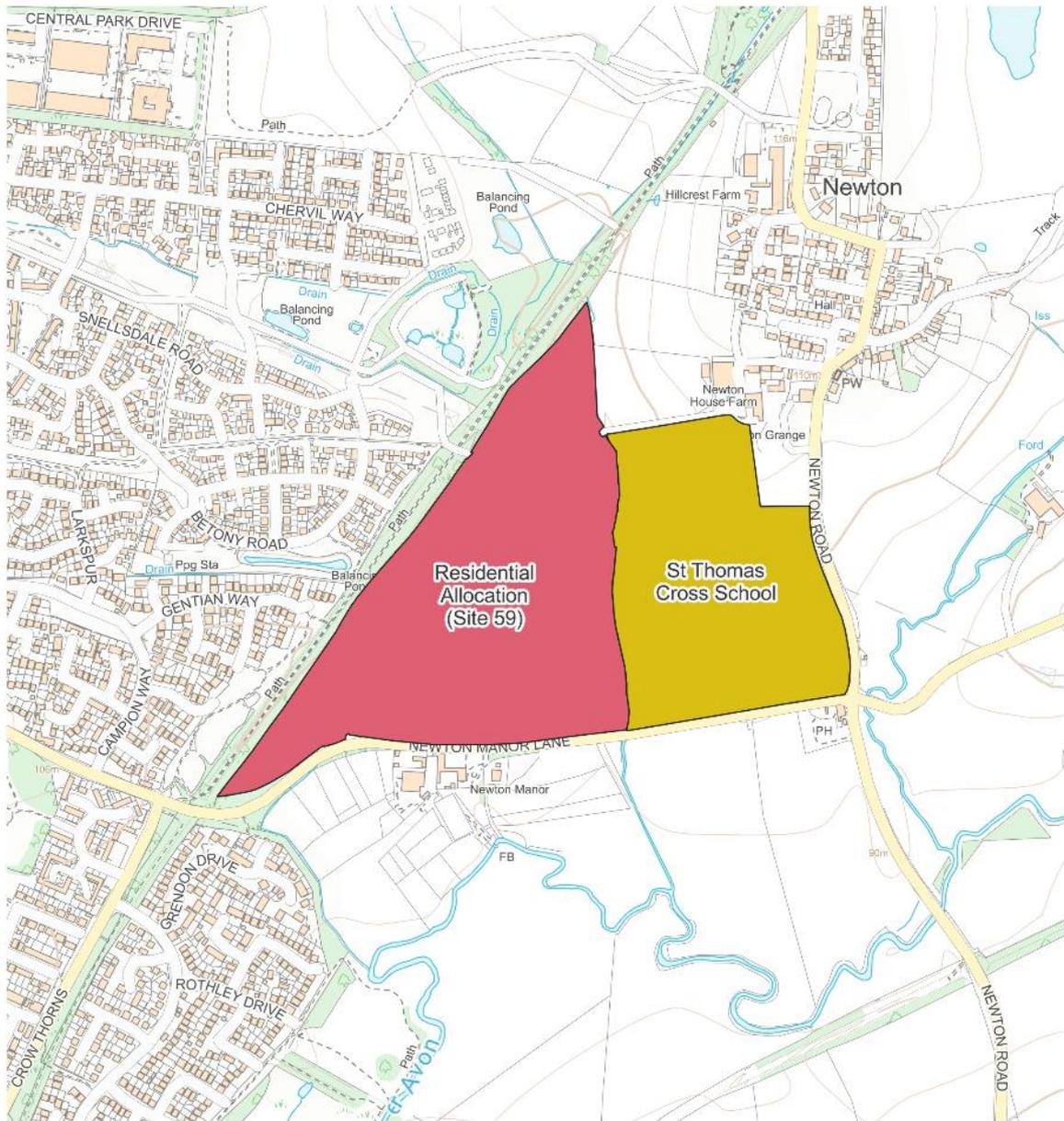
Question 23	To what extent do you agree with the document's design policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 24	What are the reasons for your answer to question 23?

Infrastructure

The consultation document contains six policies that are focused on infrastructure. In summary, these are:

- Development shall be designed to promote active travel and public transport use, while ensuring safe access and mitigating adverse impacts on the highway network (policy I1).
- Adequate parking for bicycles and vehicles, including parking to meet the needs of people with disabilities or impaired mobility, shall be provided in accordance with set standards (policy I2).
- New communications infrastructure shall be permitted where it is justified and in accordance with national and local policies, and where opportunities for using existing sites do not exist. All major commercial and residential developments shall include full fibre broadband connections (policy I3).
- Development shall only be permitted where adequate infrastructure exists or will be provided. Such infrastructure may be delivered through planning conditions, planning obligations, or secured public funding (policy I4).
- Development of the new Rugby Parkway rail station is supported, and land is safeguarded for the delivery of the proposed Nuneaton Parkway station (policy I5).
- Land is allocated for a new sixth form secondary school at St Thomas Cross north east of Rugby town (see figure below), to be funded by contributions from all major residential developments in the Borough (policy I6).



Question 25	To what extent do you agree with the document's infrastructure policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 26	What are the reasons for your answer to question 25?

Any Other Feedback

Question 27	If there are any other comments you wish to make regarding the consultation document which you have not already given in your preceding answers, please enter them here.

About You

Please let us know your name, your address (including postcode), and if applicable, the organisation you are representing. **This information is essential and responses that are submitted without it may not be taken into consideration.**

When we publish your representations we will also publish your name. This is necessary because we cannot accept anonymous representations in line with Planning Inspectorate requirements and requirements of our Statement of Community Involvement (SCI). We will not, however, publish your other personal information such as your postal address or email address which will be redacted. However, in line with our SCI you will need to supply your name and address as **we are unable to accept anonymous representations.**

You do not have to give us demographic information (age, gender identity, ethnicity etc.) but if you do we will have a better understanding of how representative our consultation has been.

Our privacy notice, which explains how data submitted to us will be managed, is reproduced as an appendix to this questionnaire.

Question 28	Are you a resident of Rugby borough? (please circle one answer)
	YES NO

Question 29	What is your name?

Question 30	What organization are you representing, if applicable?

Question 31	What is your contact email address?

Question 32	What is your contact address (including postcode)?

Question 33	What is your gender identity? (please circle one answer)			
Male (including trans man)	Female (including trans woman)	Other including non-binary	Prefer not to say	No answer

Question 34	What is your age? (please circle one answer)						
16-24	25-34	35-44	45-54	55-64	65-74	75-84	85+

Question 35	What is your ethnicity? (please circle one answer)	
White English	Indian	
White Welsh	Pakistani	
White Scottish	Bangladeshi	
White Northern Irish	Chinese	
White Irish	Any other Asian background	
White Gypsy or Traveller	Black African	
Other White background	Black Caribbean	
White and Black Caribbean	Any other Black/African/Caribbean background	
White and Black African	Arab	
White and Asian	Any other ethnic group	
Any other mixed background	Prefer not to say	
Asian/Asian British		

Question 36	Do you consider yourself to be disabled? (please circle one answer)		
YES	NO	PREFER NOT TO SAY	

Question 37	What is your sexual orientation?					
Heterosexual /straight	Gay woman/ lesbian	Gay man	Bisexual	Other	Prefer not to say	No answer

Question 38	What is your religion or belief? (please circle one answer)
No religion	Muslim
Buddhist	Sikh
Christian	Any other religion
Hindu	Prefer not to say
Jewish	

Privacy Notice

This privacy notice relates to Rugby Borough Council's development strategy services. It applies to information provided by post, email, telephone and online.

The data controller

The data controller for the development strategy service is:

Rugby Borough Council, Town Hall, Evreux Way, Rugby CV21 2RR, United Kingdom

We will store the data in our computer and manual record systems and restrict access according to relevant policies and procedures.

Personal data

The personal data we may hold includes: your name, address and contact details, signature, and role, along with any information you choose to give us.

We will use this data for the following purposes:

- To consult on strategic planning matters;
- To inform current or future planning policy;
- To inform the preparation and examination of neighbourhood plans;
- To inform the preparation, review or updating of Article 4 directions, Community Infrastructure Levy, Local Development Orders or such other planning documents the council may prepare from time to time;
- To prevent or detect fraud or other crime;
- To enable a matter to be considered at appeal, public inquiry, local plan examination, neighbourhood plan examination, judicial review or statutory challenge, where appropriate;
- To carry out enforcement activity related to our planning enforcement powers.

Legal basis

The processing is necessary so that we can carry out our strategic planning functions.

Where you have told us that you would like us to keep you informed about a matter, data protection law describes this legal basis as **consent**.

Where the processing is necessary to fulfil the council's legal obligations, data protection law describes this legal basis as a **legal obligation**.

Where the processing is necessary to detect or prevent fraud or other crime, or in relation to our enforcement powers, data protection law describes this legal basis as **necessary for performance of a public task, or in the public interest**.

If you do not provide the information we ask for it may not be possible for us to consider your representations.

We may need to process Special Categories of personal information in order to assess any applicant-specific conditions. Where this is necessary, data protection law describes this exemption as being of **substantial public interest**.

Consent

Where we are relying on your consent to process your personal information, for example to keep you informed of a matter you have previously told us that you wanted to hear about, you may opt out at any time by letting us know. We do not need your consent when we are processing your personal information in connection with our legal obligations or in the public interest.

Disclosure

Rugby Borough Council may pass on your personal data to third parties for the purposes of detecting or preventing fraud or other crime, or if it is necessary to consider your representations. These organisations may include amongst others consultants instructed by us, other participants in local plan examinations, parish councils, Warwickshire County Council, the Environment Agency, Historic England, Highways England, Warwickshire Police, the Department of Work and Pensions, HMRC, the Planning Inspectorate, independent examiners, or any other organisation where we are required or permitted by law to share information.

Your records are held in a secure section of the council's information management system

We may make representations you submit to us available for public inspection and/or publish them on our website. When we publish your representations we will also publish your name. This is necessary because we cannot accept anonymous representations in line with Planning Inspectorate requirements and requirements of our Statement of Community Involvement (SCI). We will not, however, publish your other personal information such as your postal address or email address which will be redacted. However, in line with our SCI you will need to supply your name and address as we are unable to accept anonymous representations.

Retention period

Rugby Borough Council will process your personal data for as long as is necessary to complete the plan making process or other process in respect of which you have submitted your representations to us. Representations submitted in response to a local plan consultation will remain on our website and be available for public inspection until at least six weeks after the

date of adoption of the plan. In the case of representations submitted in response to a supplementary planning document (SPD), representations will remain on our website and available for public inspection until at least three months after the SPD is adopted.

The information may then be archived in the public interest and will be made available to the public on request.

Your rights as a data subject

You have the right:

- to request a copy of the information that we hold about you;
- to correct data that we hold about you that is inaccurate or incomplete;
- in certain circumstances you can ask for the data we hold about you to be erased from our records;
- where certain conditions apply to have a right to restrict the processing;
- in some circumstances, to have the data we hold about you transferred to another organisation;
- to object to certain types of processing such as direct marketing;
- to complain if we refuse a request you may make using these rights and you are not happy with our reason.

We may refer any request you may make using these rights to another organisation, if they have been involved in processing your personal data.

Complaints

If you are unhappy about how we are handling your personal data you can complain to the Data Protection Officer. You can also complain to the Information Commissioner's Office.

The details for each of these contacts are:

Data Protection Officer, Rugby Borough Council, Town Hall, Evreux Way, Rugby CV21 2RR

Information Commissioner's Office, Wycliffe House, Wilmslow SK9 5AF, United Kingdom, casework@ico.org.uk, 01625 545745

More information

You can find more information about how we use personal information and your rights at www.rugby.gov.uk/privacy.

This notice was last updated on 26 June 2024.

Appendix 7 – Evidence Critiques

Development needs evidence

N.b. evidence relating to employment land need specifically is included under ‘evidence related to employment land’ below.

Critique	Policy or evidence document referred to	Detail	Name of respondent raising	Officer response
Evidence to support the 50 dwellings/year windfall assumption would be useful as part of the development needs topic paper.	Development Needs Topic Paper		Hinckley and Bosworth Borough Council	A topic paper is being produced to evidence the windfall assumptions. This will be published alongside the Regulation 19 plan.
Argue double counting of supply	Development Needs Topic Paper	the Topic Paper then appears to incorrectly take off further commitments for the period 2022-2024 – the Alignment Paper had already done this.	Ashfield Land (Harborough) Limited	The topic paper takes the net 2022-2045 number in the Alignment paper, then converts it to a gross number by adding back in the commitments listed in the alignment paper. It then equalises the hectare area of the commitments by applying a consistent 0.35 plot ratio. That gives a gross 2022-2045 requirement. 2022-2025 completions are then deducted to reach a gross requirement at a 2025 base date. Planning permissions/existing allocations are then deducted from the gross

Critique	Policy or evidence document referred to	Detail	Name of respondent raising	Officer response
				requirement to give a net need figure
Further information on the level of buffer would be useful in the development needs topic paper	Development Needs Topic Paper	9% buffer identified	Hinckley and Bosworth Borough Council	See section in the Consultation Statement regarding the buffer and the range of views provided on this.
Further information on the non-implementation buffer would be useful in the development needs topic paper	Development Needs Topic Paper	10% non-implementation buffer	Hinckley and Bosworth Borough Council	As above
Recommend review of the Development Needs Topic Paper to respond to up to date economic conditions and forecasts		Note topic paper was prepared in 2022 based on data which is even older. Essential for up-to-date robust evidence. The topic paper does not refer to Magna Park despite it being immediately adjacent to the borough boundary and recommend that it is included. Harborough has identified it as a key area of opportunity.	UK Land Operations Ltd	The Development Needs Topic paper has been reviewed and updated to respond to latest information.
HEDNA is based on assumptions which no longer apply	HEDNA	Higher HEDNA figure will lead to unsustainable development and is not substantiated	Brinklow Parish Council	The HEDNA continues to form part of the evidence base. With regard to housing need, it has been superseded by the national Standard Method, and by a new Housing Needs Study. With regard

Critique	Policy or evidence document referred to	Detail	Name of respondent raising	Officer response
				to employment need, the HEDNA should be read in conjunction with the WMSESS and subsequent alignment paper and addendum.
HEDNA is estimates only and is especially wrong for Wolvey Parish in terms of location & allocation details	HEDNA	This will cause damage to the environment, character & appearance of the village & does not meet the aim of sustainable development	An individual	The status of the HEDNA in the evidence based is discussed above. The HEDNA considers need, and not spatial distribution/strategy.
HEDNA is out of date	HEDNA	No further details included		For housing need a new Housing Needs Report (2025) has been produced. For employment need, it should be read in conjunction with the WMSESS, WMSESS/HEDNA alignment paper and subsequent addendum.

Site Assessment/selection evidence

Critique	Policy or evidence document referred to	Detail	Name of respondent(s)	Officer response
Criticism of judgements made about individual sites in stage 2 site assessment of HELAA	Stage 2 site assessment and HELAA	Numerous site promoters raised criticisms of the judgements made about their individual sites in the Stage 2 site assessment and HELAA. Those representations are published and we do not list them all here.	Numerous site promoters	The comments have been reviewed and where necessary the Stage 2 Site assessment has been updated and a HELAA addendum has been produced
Flooding from River Anker at Wolvey not accounted for	HELAA, Stage 2 Site Assessment	Flooding around the River Anker (photos provided) which undermines the suitability of sites in Wolvey has not been adequately accounted for.	Wolvey Wetland Trust	A Stage 2 Strategic Flood Risk Assessment has been undertaken and the sequential test applied to allocation sites.
Safeguarded land at SW Rugby is not included in HELAA as a residential potential site	HELAA	Land was safeguarded for either housing or jobs and SW Rugby SPD showed potential for housing		The land promoter put this land forward for employment use in the Call for Sites.
Also pleased that the above assessments have been utilised to inform the Rugby Stage 2 Site Options Assessment	Stage 2 Site Options Assessment, March 2025	This heritage considerations have been integral to the process of the local plan	Historic England	Noted.
Arguments that individual sites are grey belt	Stage 2 site assessment	Numerous green belt site promoters put forward arguments that their sites should be identified as grey belt. Those representations	Numerous site promoters	Green Belt evidence addressing this point is published at Regulation 19 stage

Critique	Policy or evidence document referred to	Detail	Name of respondent(s)	Officer response
		are published and we do not list them all here.		
Inadequate reference to para 86 NPPF criteria for selecting employment sites	Site selection methodology		Richborough Commercial	Noted. The proposed submission plan aligns with the objectives of paragraph 86
Accessibility scoring based on LSOAs creates a boundary effect	Stage 2 site assessment	this leads to sites on Coventry urban fringe being low scores	Barberry	We agree, this is why this information is supplemented with the use of the DfT Connectivity score tool and with more qualitative information in relation to accessibility.
The transport impacts are underplayed - reference to the report of the inspector during the last local plan process	Stage 2 site assessment	A site where travel can be minimised nor sustainable travel maximised	Claremont obo J Marine Ltd	The Strategic Transport Assessment will examine the site in the context of the latest modelling information.
Independent education analysis undertaken in respect of site 136 which has been omitted based on primary school capacity	Stage 2 site assessment	Site assessed as suitable but not put forward for allocation based upon primary school capacity. Appendix 3 of rep includes independent education evidence. Summarised as acknowledgement that Wolston primary is at capacity, but other primary schools within 2 miles are under capacity. Forecasts demonstrate capacity. Also question conclusion that there is no potential to expand Wolston primary.	Catesby Estates	We have commissioned our own independent modelling of school place provision across the borough, and liaised with colleagues at the Local Education Authority at WCC. A topic paper setting out the findings will be published at Regulation 19 stage.

Critique	Policy or evidence document referred to	Detail	Name of respondent(s)	Officer response
Not all employment allocations are assessed within the Stage 2 Site Assessments	Stage 2 site assessment	Prospero Ansty, Symmetry Park, Coton Park East and Padge Hall Farm are included as proposed allocations but their origin is not clear	S&D Postlethwaite	These sites all have existing planning permission.
The STA will comprise WCC's transport response - initial highways feedback is too simplistic	Stage 2 site assessment, STA		Warwickshire County Council	Noted.
Land at Cosford (site 114) would attract objection from WCC on the basis of minerals.	Stage 2 site assessment	Site crosses 3 MSAs, has significant resources and occupies a strategic location. Could however see a scenario where objection could be overcome with an extraction programme prior to development (anticipated 10-15 year programme), subject to detailed minerals report (not just desktop report).	Warwickshire County Council	Noted.
Stage 2 Site Assessment does not adequately account for matters that make Lodge Farm unsuitable and unviable	Stage 2 Site Assessment	Arguments presented regarding the constraints and negative impacts Lodge Farm may have if developed, covering transport, environmental and public health harm, affordable housing and lack of services.	Stand Against Lodge Farm Village, The Willoughby Society	Evidence in respect of the Lodge Farm site has continued to be gathered, including in respect of transport (the Strategic Transport Assessment) and viability. This information will be published at Regulation 19 stage, though it is not proposed that Lodge Farm will be included as an allocation.

Critique	Policy or evidence document referred to	Detail	Name of respondent(s)	Officer response
Assessment of site 73		Dunchurch Surgery is operating above capacity and would not be able to support patients from Lodge Farm (Site 73). It was extended to allow for 7,500 patients but already has 8,200. Furthermore, the roads and schools of Dunchurch would not be able to cope with the development. Therefore, the site should be discounted entirely.	Dunchurch Surgery	Additional information has informed site assessments. Allocations at Dunchurch has also been reviewed and amended for Regulation 19.
Recommend historic landfill sites are considered		Can impact delivery of development. EA have some data though Council likely to hold best data - recommend consultation with relevant internal team.	Environment Agency	Historic landfill sites are identified in the HELAA as a potential constraint where applicable.
Proposal for sites 84, 96 & 309 does not address capacity at the nearest GPs or emergency services	l1	This violates the sustainable development principles of the NPPF & the Local Plan's infrastructure policies	An individual	We continue to liaise with the Integrated Care Board (in the case of Wolvey the Leicestershire ICB) regarding GP provision, and with the NHS regarding other service provision. This is set out in the forthcoming Duty to Cooperate Statement.

Evidence relating to employment land

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
WMSESS/Alignment Paper overestimate supply in OA7	Alignment paper/WMSESS	Detailed critique prepared by ND, Coventry unmet need is 348000sqm, also unmet need from Harborough. Nurton make a few main arguments (1) completions trend in past 4 years show future supply would be inadequate (2) supply is overestimated and shouldn't include past completions (3) Gigafactory and Crowner Fields Farm shouldn't be included. Stoford argue Frasers shouldn't be included as it is inward investment from outside of the West Midlands in justification of this they cite the discussion of the JLR and gigafactory sites at para 10.60 WMSESS (4) Stoford: Padge Hall Farm shouldn't count as not within opportunity area	GLP, Stoford	An addendum has been prepared to the WMSESS/HEDNA alignment paper, for publication alongside Regulation 19 documents.
Replacement build assumptions	WMSESS	Implication that 77% of existing sites (central replacement scenario) will have been demolished and replaced by 2045 is not realistic. Should consider rates of loss of employment land to other uses. But no evidence to justify 30% replacement figure. Stoford	Richborough Commercial, Stoford	This is partly addressed in the Coventry & Warwickshire Employment Needs Addendum to the Coventry & Warwickshire Alignment Paper. Developing a methodology

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
		(Marrons) argue recycling site assumption of 20% is too high.		for forecasting the need for employment land in the long-term is difficult. There is no perfect methodology. The WMSESS sets out a justification for use of the MDST traffic growth and replacement demand model.
Traffic growth model	WMSESS	Forecasting based on MDSS lacks transparency but the traffic growth model of +10ha 2022-2045 per annum across West Midlands is too low	Richborough Commercial	Developing a methodology for forecasting the need for employment land in the long-term is difficult. There is no perfect methodology. The WMSESS sets out a justification for use of the MDST traffic growth and replacement demand model.
Strategic sites adjustment	WMSESS	Strategic sites adjustments for small units on strategic sites and big units on non-strategic sites do not match Rugby BC pattern for preponderance of these. Barjane: the number of big box units on non-strategic sites has been underestimated. Stoford: upward adjustment for strategic floorspace on non-strategic sites in the Alignment Paper should match that in the	Richborough Commercial, Stoford, Barjane	This is addressed in the Coventry & Warwickshire Employment Needs Addendum to the Coventry & Warwickshire Alignment Paper

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
		WMSESS (25%) at the moment the upward adjustment is less than would be needed to balance the downward adjustment		
Plot ratios	WMSESS/alignment paper	Plot ratios should be 0.25 not 0.35 due to BNG	Stoford,	An addendum to the WMSESS/HEDNA alignment paper has been prepared. This considers the matter of plot ratios.
Alignment paper reduces local need in comparison to HEDNA	Alignment paper	Queries discrepancy between these two assessments of local need	GLP, Stoford	An addendum has been prepared to the WMSESS/HEDNA alignment paper, for publication alongside Regulation 19 documents.
Plot ratios too high	WMSESS	Reasons given: advanced, efficient and environmental credentials now the norm. BNG requirements, larger HGV circulation, solar, EV charging and battery storage. All make lower plot ration more desirable. Rep includes Midlands plot ratios: average 29%	SEGRO	An addendum to the WMSESS/HEDNA alignment paper has been prepared. This considers the matter of plot ratios.
Method of rebasing need to 2021 in alignment paper	Alignment paper	To re-base the need should be pro-rated then 2021 completions should be deducted	Stoford	Iceni used the chosen methodology within the Alignment Paper suggestion because the West Midlands Strategic Employment Sites Assessment (WMSESS) 2024, which informs the

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
				<p>Alignment Paper, does not provide the gross need at the Coventry and Warwickshire level and therefore the residual need has been pro-rated. This is considered the most practical way to align the modelling to the 2021-45 timescale. At a local authority and local plan level, this difference in methodology approach does not have an impact, as the Coventry and Warwickshire gross strategic need headline figure does not inform plan-making. Instead the residual requirement within the opportunity areas are of greater importance to informing strategic sites requirements. Additionally, Rugby's local plan period is 2025-42 and so requirements to 2021-45 are not regarded.</p>
Past/recent completions trend shows higher	WMSESS	suggest use of past completion trend, including last few years	GLP, Stoford, WPDG	This is addressed in the Coventry & Warwickshire

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
demand for industrial land				Employment Needs Addendum to the Coventry & Warwickshire Alignment Paper
A suppressed demand adjustment should be applied to the completions trend and the MSDT scenario	WMSESS	Argument put forward in Marrons "Technical Review"	Stoford	This is addressed in the Coventry & Warwickshire Employment Needs Addendum to the Coventry & Warwickshire Alignment Paper
WMSESS, HEDNA, Alignment Paper all predate 2024 NPPF, the Planning and Infrastructure Bill and Invest 2035	WMSESS, HEDNA, HEDNA/WMSESS Alignment Paper	Suggest all outdated as a result	Avison Young obo Tarmac	A further addendum has been commissioned regarding the employment evidence base, and will be published at Regulation 19 stage.
Shortcoming of the HEDNA and WMSESS is that they don't take account of historic suppressed demand	HEDNA, WMSESS	Limited availability of land and buildings has the effect of suppressing demand. Completions data does not take account of losses where occupiers have moved outside the area.	Mountpark Logistics	This is addressed in the Coventry & Warwickshire Employment Needs Addendum to the Coventry & Warwickshire Alignment Paper
Concern that local industrial requirement underplayed compared to previous studies	Alignment Paper	Including the HEDNA which identified 150.5ha local industrial to 2041	Prologis	This is addressed in the Coventry & Warwickshire Employment Needs Addendum to the Coventry & Warwickshire Alignment Paper

Environment Evidence

Critique	Policy or evidence document referred to	Detail	Name of respondent(s)	Officer response
No canopy baseline assessments or mitigation strategies presented	EN5	Policy EN5 requires major developments to achieve at least 20% post-development canopy cover, Wolvey's field boundary trees & hedgerows may not be able to meet this. The lack of this evidence makes compliance doubtful for sites 84, 96 & 309.	An individual	This is a level of detail that would be determined at planning application stage, rather than during plan-making.
The proposed 'riverside walk and nature park' in Wolvey (Site 84) is presented without any supporting ecological evidence, costings or delivery mechanisms	EN4	Policy EN4 requires a 10% biodiversity gain with clearly measurable metrics but this is not demonstrated for this proposal.	An individual	Following a review of the strategy, this site allocation will be removed from the Regulation 19 version of the plan.
No ecological assessments or biodiversity report in plans for Wolvey	Ecological assessments, biodiversity report	Development will fragment & destroy habitats of local wildlife	An individual	Ecological constraints have been considered in the assessment of sites.
Assessments should be made of potential green infrastructure corridors and 'wildbelt' areas		The outcomes of these assessments should inform housing allocation locations.	Warwickshire Wildlife Trust	Potential GI corridors were a proposed policy designation. This isn't proposed to be carried forward as it was unclear how they should be applied in decision making.

Critique	Policy or evidence document referred to	Detail	Name of respondent(s)	Officer response
Tree canopy policy based on inconsistent evidence		The State of Habitats: Rugby Borough in the evidence base estimates tree canopy cover within the borough is 12% - much higher than the 4.5% quoted in the PO. The 2017 Canopy cover report relates solely to towns and cities not wider LA areas	Rosconn Group	Tree canopy estimates are not likely to be precisely accurate. It is likely that the borough as a whole has a lower canopy cover level than the town of Rugby because of extensive areas of arable land.
Welcome HRA, particularly likely significant effects on The Humber Estuary SAC and The Severn Estuary	HRA	Measures identified through the HRA should be secured through policies in the plan	Natural England	An appropriate assessment has been prepared. Noted.
Ecological sensitivity of site means it shouldn't be progressed	Ecology assessment	Refers to Lepus assessment	GLP	The site promoter has provided further ecological information, which has been considered. For other evidence-based reasons however, it is proposed to delete this site allocation.

Heritage evidence

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
Welcome that relevant evidence has been produced to inform the preferred options, namely: the Heritage assessment of local plan site allocations for Rugby Borough Council (March 2025 and addendum April 2025). Pleased to see this assessment followed the 'Site Selection Methodology' as set out in Historic England's Advice Note 3.	Heritage Assessment of local plan site allocations for Rugby Borough Council, March 2025	Historic England's Advice Note 3: The Historic Environment and Site Allocations in local plans, 2015 (HEAN3)	Historic England	Noted.
Canal CA in West Northants is not considered in the assessment of the Lodge Farm site	Heritage Assessments	The Oxford Canal in West Northants is a designated CA. Recommend Rugby considers designating similarly	Claremont obo J Marine Ltd	As above.

Landscape evidence

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
Landscape Character Assessment focuses too much on the area within the administrative boundary. Features such as canals and the marina should be acknowledged, and heritage context and sensitivities recognised	Landscape Character Assessment, Landscape Sensitivity of Strategic Sites	Canal flows into West Northants and is covered by a CA. Consider the LCA and Landscape Sensitivity of Strategic Sites should be updated to respond to this and reassess the Lodge Farm site (which is opposed by the Marina).	Claremont obo J Marine Ltd	We intend to look into the potential to designate the canals within the borough as a Conservation Area/as Conservation Areas. This will take place outside the local plan process. In addition, we have commissioned additional landscape assessment work of the Rainsbrook Valley. The appointed consultants will consider the valley across the administrative boundary as part of this work.
LSAs contradict the 2015 LSAs conducted by WCC	Landscape Sensitivity Assessments	The new Landscape Sensitivity Assessments contradict the 2016 Landscape Sensitivity Assessments produced by WCC, yet no changes have occurred that would explain a difference in outcome.		The LSAs were commissioned from independent consultants in the case of larger sites and conducted in-house for smaller sites initially. These in house assessments are being independently checked and verified. Previous LSAs have considered broad areas of landscape sensitivity, whereas the most recent assessments focus on potential sites.

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
Sites 40 & 334 - Rainsbrook Valley should be protected from development	Landscape Sensitivity Study	Previous landscape studies undertaken by WCC on behalf of RBC have shown the Rainsbrook Valley to be highly sensitive to housing, due to its topography, high visual sensitivity and the landscape being in strong condition. Unaware of any significant change since previous studies, so question why this has not been picked up in the 2025 Landscape Sensitivity Study. Also refers to appeal decisions in the Valley which have supported this stance.	Warwickshire County Council	We have reconsidered these proposed allocations in light of feedback. We have also commissioned additional landscape evidence in respect of the Rainsbrook Valley to support our policy approach. This will be published at Regulation 19 stage.
Quality issues with the landscape assessments	Landscape Sensitivity Study	Representation references rep (1720)		As identified above, the landscape assessments commissioned in support of the Preferred Options consultation had a different scope to previous assessments - i.e. they assess 'sites' rather than the broader landscape. Notwithstanding this, further evidence in respect of the Rainsbrook Valley has been commissioned.
Substantial changes in the assessment of Wolvey in Landscape Sensitivity Assessments dated	Landscape Sensitivity Assessments for larger sites	The only fundamental changes to Wolvey between these dates are the demolition of the Galliford Try site and the ongoing building works, other	An individual	2025 landscape sensitivity studies had a different scope and methodological approach in that they

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
December 2024 & March 2025 compared to Landscape Sensitivity Reports 2016	(December 2024) & smaller sites (March 2025)	minor planning builds and the Coventry Road site which has still not started. Therefore, question whether the true terms & goals of the latter reports were the same as the earlier one.		considered the sensitivity of sites, rather than the wider parcels or areas.
Produced without an updated landscape character assessment	Lodge Farm Landscape Technical Document	Document only provides updated scores based on 2006 assessment. A45 as an urbanising factor is wrong as the High Road between London and Holyhead is an ancient route and the current width in this area was set in 1760		Landscape Assessments for each site were undertaken and informed the Stage 2 Site Assessments.
Welcome that the historic environment is a key consideration in the Council's 'Landscape Character Assessment', and that designated heritage assets and cultural heritage features form part of the assessment criteria in the Council's 'Landscape Sensitivity Assessment of Strategic Site Options, March 2025	Landscape Character Assessment, January 2025, Landscape Sensitivity Assessment of Strategic Site Options, March 2025		Historic England	Noted.
Evidence base for landscape should be updated	EN2		Avon Timber Builders Limited	A new landscape character assessment was produced ahead of the Preferred Option

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
				<p>consultation, and the potential site allocations were also individually assessed for landscape sensitivity. This played into the Regulation 18 site selection process. Landscape evidence for smaller sites, produced in house has been validated by the consultants. In light of feedback received to the Preferred Option consultation, we have further sought landscape advice regarding the Rainsbrook Valley, which will be published with the proposed Submission Plan.</p>

Rural Sustainability Study

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
Wolvey Heath is a separate village to Wolvey	Rural sustainability study	Wolvey Heath should be assessed as a separate village	Sworders obo landowners	Wolvey Heath is referenced in the Rural Sustainability Study as not being included in the study (p8), due to its small size (82 dwellings). It is recorded as 'counted for in combination with nearby larger village (Wolvey). Therefore whilst the separate nature is recognised, we do not conclude Wolvey Heath is sufficient in size to be categorised as 'other rural settlement'.
Wolvey scored too highly in Rural Sustainability Study	Rural Sustainability Study	Wolvey is scored too highly in the Rural Sustainability Study. The pubs have been scored as both pubs and restaurants, contrary to the stated methodology, and points have been given for a mobile library service which only visits on an ad hoc basis. The village should have a score of 31 not 34. Per the ONS report 'Urban and Rural Area definitions for Policy Purposes in England and Wales: Methodology (v1.0)', Wolvey should	Wolvey Village Hall Foundation	We disagree - Wolvey is already defined as a Main Rural Settlement in the adopted local plan. With regard to commentary regarding the Rural Sustainability Study, the pubs have not each been scored as a pub and a restaurant. One has been counted as a pub, and one as a restaurant. Both serve food, so this is considered an appropriate application of the

		not be defined as a Main Rural Settlement.		methodology. It is understood that the mobile library visits infrequently, but this is the case with all stops on its route. All settlements which is visited by the mobile library have been scored consistently.
Wolvey scores 35 in Rural Sustainability Study, this should be 31	Rural Sustainability Study 4.1	Appendix A scoring table is incorrect in 2 of the columns. Wolvey has 2 pubs/eating houses which according to the methodology and statements under Section 3.13. and 4.3. are only counted once but these have been counted twice. Also, the allocation of points for a library is incorrect as the mobile library no longer visits regularly, only on an ad hoc basis. Therefore 4 points should be deducted taking Wolvey's score to 31. This would downgrade Wolvey from a 'Main Rural Settlement' as per 'Urban and Rural Area definitions for Policy Purposes in England and Wales: Methodology (v1.0)'	Craig Leach	We disagree - for the reasons set out in the response above.

Sustainability Appraisal (SA)

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
Detailed critiques of SA	SA	e.g. NW Rugby could support off-site delivery of secondary school. St Modwen say the key issue is lack of appraisal of individual site options	Allesley Investments, Stoford, St Modwen	Noted in relation to the off-site delivery of a school, although the Education Topic Paper shows that a new secondary school is not required. The SA report explains why reasonable alternatives and site options are not and cannot be synonymous.
Welcome inclusion of the historic environment within the SA	SA	Welcome inclusion of different heritage assets and heritage at risk. Also welcome the objective of protecting and enhancing the historic environment, and that growth scenarios have been assessed in relation to impacts on the historic environment and on impacts to landscape and townscape character.	Historic England	Noted.
Agree that sites 337 and 129 are sensitive in relation to historic environment	SA		Historic England	Noted.
Agree that sites 315 and 316 should be considered for a site	SA		Historic England	Noted.

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
specific policy (as the plan proposes)				
there should have been a 4 spatial scenario (no green belt release) and a scenario for higher employment growth	SA		Stoford	We do not agree that a no green belt release scenario is reasonable.
Green Belt should be an SA topic	SA		Stoford	The SA for Regulation 19 will be able to take account of the new green belt evidence. However, this is not identified as an SA topic.
SA should assess individual sites	SA	Argue this is needed to comply with SEA, also argue it is needed to show how packages of sites have been derived. Argue creating packages of sites has not meant assessment of sites on a like-for-like basis. Cite Heard v Broadland DC [2012] EWHC 344 (Admin) para 71	St Modwen	See answer above.
SA should explain reason for rejecting alternatives	SA	cite Save Historic Newmarket Ltd v Forest Heath DC [2011] EWHC 606 (Admin) (25 March 2011) (para 40).	St Modwen	Whether this criticism carries weight depends upon whether reasonable alternative is viewed as synonymous with "omission site". For the reasons outline above we do not consider that reasonable alternative and omission sites can be regarded as the same thing. The reason for

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
				rejecting omission sites is summarised in the Stage 2 Site assessment.
Unclear how SA has influenced preferred option	SA	cite Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government [2014] EWHC 406 (Admin) (21 February 2014) (para 91)		It is not clear that the case cited supports the point raised. Sustainability Appraisal has influenced plan development as part of an iterative process as more evidence has been gathered.
Disagree with Coton Park East, South West Rugby and Ansty Park North being 'constants' in the employment land growth scenarios	SA		Stoford	Noted. The first site is within the urban area, and has not come forward for housing as per its allocation in the adopted plan. The SW Rugby safeguarded land is safeguarded for development, and the Ansty Park North is providing a different employment offer. This is why they were considered 'constants'. This is considered to be justified.
Welcome SEA/SA interim report, but note that it does not contain any assessment of the potential effects of the plan on designated assets such as SSSIs	SEA/SA	It should outline proposals to protect and enhance biodiversity including nature conservation sites. The direct and indirect impacts of proposed development should be considered including impacts on water quality and air	Natural England	Please see the ecology sensitivity assessments prepared for sites, the level 2 water cycle study and the HRA appropriate assessment which consider these points.

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
		quality. Site selection must be informed by relevant environmental assessments.		
The strategic case for growth in the location of site 68 (Junction 1 of the M69) has not been assessed to the full extent required	Sustainability Appraisal	SA says: strategic case for growth in this location is not as strong as it is at the edge of Coventry, and also perhaps not as strong as at the edge of Rugby	UK Land Operations Ltd	The reasons why site 68 is not a proposed allocation are explained in the stage 2 site assessment. We consider that not identifying this site as part of a reasonable alternative is a justified judgment.
Object to inclusion of Lodge Farm as a reasonable alternative	Sustainability Appraisal	Copies of objection letters included in the rep, plus a plan showing the relationship of Lodge Farm as proposed to the Marina.	Claremont obo J Marine Ltd	Noted. We have continued to assess the Lodge Farm site post Preferred Option consultation, though it will not be included as an allocation at Regulation 19 for reasons set out in the evidence base.
Object to SA conclusion of low ecological constraints in the SA	Sustainability Appraisal	Rep lists nearby sites of ecological value and refers to the value of habitats at the marina itself which are recognised in local biodiversity action plans. Also a number of wildlife corridors. The Lodge Fram proposal appears to include Dunchurch Pools as parkland for the development	Claremont obo J Marine Ltd	Noted. The SA will be updated for the Regulation 19 plan and the latest available information taken into account.
Object to SA conclusions re emissions, communities, health and wellbeing, employment and transport (landscape	Sustainability Appraisal		Claremont obo J Marine Ltd	As above.

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
and heritage addressed separately)				
In agreement with methodology and results	Sustainability Appraisal		Davidsons Homes (Clifton)	Noted.
Robustness of SA is undermined by inclusion of Lodge Farm	Sustainability Assessment	The inclusion of Lodge Farm within two of the growth scenarios despite its known failings suggests the SA process has been contorted to keep a fundamentally flawed site in the running. It reveals a bias that undermines the robustness of the SA.	Stand Against Lodge Farm Village	We disagree, as robust assessment of reasonable alternatives allows us to test different scenarios. We have continued to assess and test the reasonable alternatives through emerging evidence such as the Strategic Transport Assessment.
Sustainability Appraisal does not appear to inform Local Plan and is at odds with some policies	Sustainability Appraisal	SA is led by the emerging Plan and makes incredible conclusions such as finding Wolvey sustainable location for large-scale growth while also noting its low settlement score	Wolvey Parish Council	See response to similar comment above
SA does not consider options without site 17	Sustainability Appraisal	Site 17 is treated as though it is already somewhat committed when this is not the case	Thurlaston Parish Council	Site 17 is safeguarded for development in the adopted local plan. This was therefore considered to be an appropriate 'constant' within the reasonable alternative scenarios.
Clifton upon Dunsmore assessment doesn't reflect sequential green belt approach and unfairly downplays	Sustainability Appraisal	Fails to give proportionate weight to green belt release, and appears to endorse a strategy based on primary school capacity which could be overcome.	Mackenzie Miller Homes	The strategy weighs up the evidence published. Additional evidence in respect of green belt will be published at the next

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
sustainability when compared with other main rural settlements				stage, as will further evidence regarding school place provision.

Viability evidence

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
The viability of older person's housing is different to other forms of housing as such should be considered separately in the Whole Plan Viability Assessment.	Whole Plan Viability Assessment	The viability of older person's housing is different to other forms of housing as such should be considered separately in the Whole Plan Viability Assessment. McCarthy Stone & Churchill cite this briefing note https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf and argue that assumptions for are typical scheme, non-saleable floorspace, sales periods, empty property costs, marketing costs, profit and local plan costs are incorrect	Homes Builders Federation, McCarthy Stone and Churchill	Noted. We have raised this matter with our appointed viability consultants with a view to this being factored into the Regulation 19 viability assessment.
Study underestimates the cost of BNG	viability assessment	Costs should be based on published statutory biodiversity credit prices	McCarthy Stone & Churchill	As noted in para 4.28 a cost of 1.4% has been applied. The viability

				consultant considers this adequate.
Cost of M4(3) and M4(2) requirements should be tested in VA	viability assessment	Argue it isn't tested contra PPG	McCarthy Stone & Churchill	M4 requirements have been tested through the viability assessment (see para 4.20, appendix 6 and para 6.23). These requirements have been adjusted following the Preferred Option as set out in the Consultation Statement.

Water related evidence

Critique	Policy or evidence document referred to	Detail	Name of respondents raising	Officer response
New flood zone maps have been published. The SFRA level 1 should be updated to reflect these	SFRA level 1		Environment Agency	Noted. The SFRA level 2 uses the latest flood maps.
Recommend further assessment to determine whether there is sufficient capacity at wastewater treatment works for the new allocations in the plan	Water Cycle Study level 1	The Water Cycle Study level 1 considers headroom capacity in existing wastewater treatment works but doesn't include new allocations proposed in this plan. Any constraints identified should be met with a solution (in consultation with Severn Trent),	Environment Agency	A Stage 2 Water Cycle Study has been prepared to provide further evidence on this matter.

		which may impact phasing policies and the IDP.		
Up-to-date flood risk assessments are needed	EN6	These need to account for the increased risk of sudden heavy rain due to climate change.	An individual	The Stage 2 SFRA will be published at Regulation 19 stage, and this will take account of the latest flood risk data.

Other evidence comments

Critique	Policy or evidence document referred to	Detail	Name of respondent(s) raising	Officer response
Small site windfall assumption not justified	N/A	Argue windfall allowance of 50dpa not justified	Sworders obo landowners	A topic paper is being prepared to evidence the windfall assumption. This will be published at Regulation 19 stage.
No evidence to support 50dpa windfall assumption	S2	Brown & Co. state it is not being delivered based on past evidence	Tritax Park Rugby West, Richborough Estates, Brown & Co. obo landowners	A topic paper is being produced to evidence the windfall assumptions. This will be published alongside the Regulation 19 plan.
Need for up to date Green Belt study			Richborough Commercial, Stoford, St Modwen, Brandon Estates, WPDG	Agree. A Green belt Contribution Study has been completed and will be published at Regulation 19 stage.
Absence of a green belt assessment is considered	green belt	Sites not independently assessed. Joint green belt study (2015) does not	UK Land Operations Ltd	Evidence relating to green belt will be published at Regulation 19 stage. The strategy and

to strongly undermine the spatial strategy		specifically assess this site in relation to green belt purposes. Landowners own green belt assessment included in rep, assessing contribution of the site to green belt purposes as low.		allocations have been reviewed in light of the evidence.
Site 6 - the green belt study will help determine whether it is appropriate to remove this site from the green belt	Green belt study		Hinckley and Bosworth Borough Council	Noted. The Green belt contribution study will be published at Regulation 19 stage, including an assessment of harm, and a topic paper on exceptional circumstances.
Cosford not sustainable	N/A	Site would be a significant distance from the facilities within existing town so would need to function as a new settlement	Davidsons Homes	Noted. We have continued to assess this site as a 'reasonable alternative' but will not include as an allocation at Regulation 19.
Power infrastructure	N/A	Queries how long it would take to deliver power supplies for Cosford and Lodge Farm	Davidsons Homes	Noted. We have continued to assess both Cosford and Lodge Farm as reasonable alternatives, but propose to allocated neither.
Potential for growth at Rugby town	N/A	Rugby has or is likely to reach saturation point in terms of further growth	St Modwen	Rugby already has two SUEs allocated. In line with the requirements of national policy and strong public opinion, further brownfield sites around the town centre have been included for Regulation 19.
Education evidence to support spatial strategy not published	S2/S6		St Modwen	A topic paper regarding education will be published at Regulation 19 stage.

Recommend the Council engage with the NHS, particularly the ICB on an ongoing basis as part of preparing the Infrastructure Delivery Plan	Infrastructure Delivery Plan	For clarity on infrastructure requirements, and to ensure planning obligations and the capital allocation processes for CIL effectively support it.	NHS Property Services	We have been and continue to liaise with the ICB and other elements of the NHS. This will continue in the preparation of the IDP.
Strongly recommend preparation of a Strategic Transport Assessment to inform the next stage of plan-making, alongside a detailed Infrastructure Delivery Plan	Strategic Transport Assessment, Infrastructure Delivery Plan	National Highways concerned principally with M1, M6, M69, A5, A45 and M45 through the borough. Would welcome the establishment of a Transport Working Group to enable coordinated technical input across relevant parties	National Highways	A Strategic Transport Assessment has been prepared to inform the next stage of plan making.
Acknowledge that transport assessment analysis work is a precursor to production of a Strategic Transport assessment. Don't understand why only 124 sites assessed through this analysis work (i.e. of the 323 potential sites), and why site 334 does not appear to have been assessed yet is a proposed allocation			Hinckley and Bosworth Borough Council	Proposed allocation sites and reasonable alternatives have been considered in the production of the Strategic Transport Assessment, and this will be published at Regulation 19 stage.
Support the use of Statements of Common Ground as part of Duty to Cooperate	Statement of Common Ground		National Highways	Noted. We intend to agree Statements of Common Ground with Duty to Cooperate partners.

Question deliverability of carried forward allocations given time since they were allocated	trajectory	Site south of Plott Lane will not deliver (Avon Timber)	Avon Timber Builders Limited, Vistry Strategic Land	The site remains within settlement boundaries and it is considered developable by 2042.
No data showing predicted access to GPs		GP per no. residents evidence needed for all proposals		The need for GP provision is being discussed with local Integrated Care Boards on an ongoing basis.

Appendix 8 – Community feedback policy S4

Comment	Site referred to	Detail	Number of reps	Officer response
Temporary planning permission was granted based on individual circumstances	Top Park	Original applicant has moved on from the site so the specific conditions of permission are no longer being met	3	Noted.
Movement of caravans to and from site holds up traffic	Top Park	Significant backlogs of traffic can appear while caravans are moved and block the roads. Concerns for emergency service access when needed	34	Noted, although we do not think this is a reason not to allocate sites.
Exceptional circumstances for Green Belt allocation have not been demonstrated	All G&T sites	Green Belt land release can only be done in exceptional circumstances - dismissal at appeal of Top Park 2 site shows inspector did not find these circumstances. Impacts from light pollution on setting of the Green Belt and no mitigating landscaping	112	The evidence relating to green belt, and a topic paper setting out exceptional circumstances will be published alongside the proposed Submission Plan.
Reports of caravans being let out to non-travellers suggesting need is not there	Top Park	Reference to Top Park 1 in particular where most residents have vacated and suggestion that the site could be closed therefore. Request that planning regulations/monitoring are used to ensure approval is restricted to the named occupiers only.	58	Noted. The Gypsy and Traveller Accommodation Assessment sets out evidence of need. Restrictions to permissions are usually applied by condition.

Comment	Site referred to	Detail	Number of reps	Officer response
Disproportionate number of pitches close to Barnacle	Top Park, Wilshner Ranch	Settled community is smaller in Barnacle than the Traveller community creating lack of cohesion, Over 90% of sites in the Borough are near Barnacle	89	It is recognised that the pitches proposed to be allocated at Top Park, Barnacle and Wilsher Ranch, Shilton would be in a location that already has a significant Gypsy/Traveller population. However, in the context of past plan-making failures and a lack of alternative options to meeting pitch need, it is better to allocate land for further pitches where opportunities arise. This will allow for managed future development and increase the council's ability to resist unauthorised development.
Insufficient infrastructure at site	Top Park, Wilshner Ranch	Lack of lighting on Top Road which is a busy B road. Lack of pathways on both sites, creating them would make already narrow roads even narrower. No drainage or sewage connections despite long-term residence which creates environmental and health challenges in	74	Policy S4 sets out requirements for new pitch provision.

Comment	Site referred to	Detail	Number of reps	Officer response
		the summer and following heavy rain. Risk of flooding.		
Allocation of sites built on without permission will encourage further unapproved sites	All G&T sites	Many of these sites were first lived on without required planning permission. Undermines planning system by now allocating them	9	We understand this concern. The principal objective of allocating such pitches is to identify a supply and prevent this situation in future.
Lack of appropriate provision for G&T community	All G&T sites	Insufficient number of legal pitches allocated within the wider borough. No provision across major sites such as Houlton or SW Rugby	65	We acknowledge that the current local plan does not identify any allocations, a situation we are seeking to rectify in the new local plan. The plan is seeking to allocate sites where achievable.
No services available nearby	Top Park, Wilshner Ranch	No good access to schools or doctors from the sites. Local services are already overstretched	45	The reasons for allocating sites in this location are referenced above. See also the Stage 2 Site Assessment report.
Roads in Barnacle are unsuitable for the volumes and kinds of traffic or for access from the sites	Top Park, Wilshner Ranch	Only one road through the village with three tight bends making it unsafe for increase in traffic or for larger business	16	The reasons for allocating sites in this location are referenced above. See also

Comment	Site referred to	Detail	Number of reps	Officer response
		vehicles. No footpaths on surrounding roads		the Stage 2 Site Assessment report.
There should be no additional allocation on sites currently under enforcement orders	Top Park	Should not be allowing pitches on sites that already break planning law. Should enforce rules not legalise inappropriate development.	1	As above, the objective is to prevent this situation in future, whilst meeting the needs of the Gypsy and Traveller Community.
Current & proposed allocated is too focused on the west of the Borough	All G&T sites	Seems that the South-East of the Borough is not being allocated any provision	1	We have identified sites where we can, that we think are suitable.

Appendix 9 – Policy S6 Community feedback by settlement

Brinklow

Settlement name:	Brinklow
Number of representations referencing settlement:	224 individuals
Names of organisations referring to settlement:	Brinklow Parish Council, The Revel Surgery

Comment	Site referred to	Detail	Number of reps	Officer response
Revel GP Surgery infrastructure cannot accommodate scale of growth	315, 337	Proposed dwelling numbers could lead to an increase of 800-1600 new patients bringing total to up to 9500 patients. There are sufficient GPs for these numbers but the building size and car park are not adequate and lack of NHS Estates funding to alter this	79	See body of report
Brinklow marina is expanding already placing strain on village services	315, 337	100 additional moorings at Brinklow marina, likely to be	1	Noted.

Comment	Site referred to	Detail	Number of reps	Officer response
		semi-permanent residents also using local facilities		
Request for new primary school in Brinklow given scale of development	315	Respondent is not opposed to the development but thinks a primary school in Brinklow would be necessary to accommodate young families in the 400 homes	1	Noted. We continue to liaise with the Local Education Authority regarding primary school place provision.
Difficult to recruit employees around Brinklow due to shortage of housing	315	Respondent reports difficulty in recruiting due to high house prices locally and poor energy efficiency	1	We note the potential benefit of housing allocations at Brinklow.
Insufficient school provision locally	315, 337	Currently no school provision post Reception class within Brinklow requiring all children to travel by car or bus to the primary school in Monks Kirby or various secondary schools. Increasing the school numbers by potentially 130 places would overburden the Monks Kirby school and increase number	76	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
		of secondary students making difficult journeys on crowded buses. Nursery site is also oversubscribed.		
Green Belt location with impact on landscape and rural and historic setting	315	Entirely Green Belt setting which is contrary to NPPF and alternatives have not been sufficiently considered. Impact on landscape views, the Tump and wildlife habitats from mature trees and hedgerows. Insufficient evidence of exceptional circumstances	56	See body of report
Green Belt location and partially within historic conservation area	337	Location partly within the Brinklow Castle (the Tump) conservation area risks damaging the views from the site and impacting on the historic character of the village	59	See body of report
Redevelopment of the existing farm buildings could provide a smaller scale development	337	Potential for housing on the areas of hardstanding with modern farm buildings	3	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
		which could enhance the setting of the historic farm buildings if sensitively designed		
Roads are already congested and unable to accommodate additional journeys	315, 337	Rugby Road in Brinklow takes up to 900 movements/hour at peak times and is already congested. Both site proposals will egress to this road leading to unmanageable traffic levels. Broad Street junction is over capacity. Already farm and industrial traffic. Developments at Ansty with exacerbate further	120	See body of report
Ecological impacts at SSSIs and wildlife sites	315	Located within the Impact Risk Zones for Combe Pool SSSI and Brandon Marsh SSSI. Also adjacent to River Avon and Tributaries Local Wildlife Site. Home to species such as bats, badgers, newts	36	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Scale of the development is inappropriate for the village size and amenities	315, 337	Addition of 400 dwellings would double the population of the village and permanently change its character and identity. There is insufficient amenities to accommodate such a large population increase	160	See body of report
Increase in flood risk to the village	315, 337	Fields currently protect from flooding although there were flood issues this year including at Brays Close. Increase in runoff would exacerbate and would need major investment in sewers and drainage. The sewage infrastructure already causes problems	76	See body of report
Electricity substation/utilities at capacity	315, 337	No sufficient capacity for 400 new homes as well as EV charging provision	14	See body of report
Loss of productive farmland	315, 337	Productive farmland will be lost to these developments and should be protected.	31	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
		Loss of village's farming identity		
Quality of new build homes is often inadequate		Issues with poor quality construction can create long-term maintenance issues and dissatisfaction	2	We have included policies within the emerging plan which aim to drive up quality. For example, H7 (Housing Standards) and policies within the 'design' section.
Lack of local housing need and wrong housing mix	315, 337	There is concern that the development may cater more to investors or commuters rather than the needs of the local population. Lack of demonstrated housing need. Affordable housing for local families and young people should be prioritised. The figures for new employees are questioned, and it is felt these workers will not be able to afford the new houses anyway	20	See body of report
Large number of new residents at once can disrupt community	315, 337	Large scale developments and the influx of new people	10	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
		can damage the wellbeing of a community. Disruption to the peace and tranquillity		
Concerns over economic impacts on residents	315, 337	Worry that large-scale new developments will make the area unaffordable to existing residents who will be displaced due to higher prices and property taxes	1	The delivery of housing generally, and particularly provision of affordable housing as set out within the plan policies seeks to enable better access to housing.
Lack of emergency service provision to support scale of growth	315	No police, fire or ambulance stations located nearby, not even ambulance station in Rugby. Congestion and poor access created by the development will compound this	6	See body of report
Site 337 is reasonable	337	Site 337 seems reasonable based on the position and size of the development proportionate to the village and is a brownfield site	3	See body of report
Lack of communal outdoor space	315, 337	Only communal outdoor space is currently a playing field with a small play area and a tennis court.	3	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
		Additional children would exceed the capacity		
Other sites around the village are more appropriate		Smaller plots within the village would be more sustainable and reduce the impact on the village. Suitable sites could include end of Lutterworth Road, field opposite houses on Coventry road at the junction with green land/Ansty road. Preference for more development at Long Lawford or Land at Coventry Road, Wolvey	5	See body of report
Questioning whether an adequate feasibility study has been done for infrastructure and traffic in Brinklow	315, 337	Concerns that any feasibility study carried out was inaccurate as Broad Street/Coventry Rd junction is gridlocked at peak times and other infrastructure is already stretched	1	We have liaised with relevant stakeholders and continue to do so. Concerns regarding traffic generally are responded to in the body of the report.
Brinklow is relatively remote, requiring private car journeys	315, 337	Site location is contrary to national sustainability goals which encourages active	27	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
		travel and reduction in private vehicle journeys, lack of adequate bus services. Very few jobs close to the site		
Construction vehicles and HGVs will cause disruption and possible damage to nearby houses	315	Houses backing onto Coventry Road already experience shaking from large vehicles from the quarry travelling at speed. Construction traffic will exacerbate this	2	Construction management is a matter usually addressed at planning application stage.
Style of new homes will be incoherent with rest of the village and not in line with Neighbourhood Plan	315, 337	Many character properties and historic buildings with conservation area status. New homes will be out of character and clash with the older buildings to be retained on site 337. Lack of regard for Neighbourhood Plan	7	See body of report
Residents in similar proximity to green belt/conservation area are unable to extend their property	337	Residents have been previously told restrictions on Green Belt and Conservation Area	2	The local plan must identify a strategy to meet the area's identified development needs. Where there are

Comment	Site referred to	Detail	Number of reps	Officer response
		developments prevent them from some works on their own homes. Felt this is a contradiction to allow large-scale development in similar location		demonstrated exceptional circumstances to do so, this may include altering the green belt boundaries, and this is what is being proposed here. Recent changes to national policy have also made changes by introducing the category of grey belt.
Exit onto Heath Lane is inappropriate	315	Heath Lane is a very narrow track lane which cannot accommodate an increase in traffic flow as a second access point to the site. Major disruption to the residents	25	See body of report
Request to make a feature of the old canal	337	Old canal located at Home Farm could be made a feature	1	Noted. This dovetails with comments expressed by Heritage England.
No infrastructure cost assessment available	337, 315	Unable to assess whether the developments are viable without overloading existing infrastructure	1	A viability assessment of the Preferred Option Plan was produced and published alongside the consultation. This will be updated for Regulation 19 stage.

Comment	Site referred to	Detail	Number of reps	Officer response
Support the development to revitalise community	337, 315	Loss of local amenities in the village could be reversed through increasing numbers and bringing house prices down to enable local people to remain there	5	See body of report
Too large a proportion of affordable housing in one place can upset the housing mix/price and community feel	337, 315	Brinklow already has a good housing mix and too large a proportion of affordable homes in one estate may not be healthy for the village. Village houses have typically come "at a premium" and this would be undermined	2	The need for affordable housing is set out in the evidence base. This view contradicts others expressed which note the restrictions of high house prices locally.
Direct contradiction to Brinklow Neighbourhood Plan	337, 315	Allocated sites were specifically rejected as unsuitable and many policies included in the thorough Brinklow plan are ignored	2	The local plan must identify a strategy to meet the area's identified development needs. Whilst we recognise the importance of neighbourhood plans, they cannot override a strategy for meeting identified needs.
50% affordable housing needed due to Green Belt setting	337, 315	At least 50% of the site should be affordable housing to meet NPPF	1	Noted. Policy H2 has been updated to reflect affordable

Comment	Site referred to	Detail	Number of reps	Officer response
		para67 Green Belt requirements		housing requirements for green belt land.

Brownsover (site 59, Newton Manor Lane)

Settlement name:	Brownsover
Number of representations referencing settlement:	191 individuals
Names of organisations referring to settlement:	Newton & Biggin Parish Council

Comment	Site referred to	Detail	Number of reps	Officer response
Intrusion beyond an established urban edge from the former railway line	59	Loss of the defensible boundary of the urban edge from the railway line which will increase pressure for development on neighbouring land impacting Coton and Newton residents.	8	See body of report - Newton Manor Lane, Brownsover

Comment	Site referred to	Detail	Number of reps	Officer response
Lack of regard for Green Blue Infrastructure Plan and no Green Blue Corridor	59	The potential developer's illustrated plan shows a considerable amount of open space on the site but there is no evidence that this will function as a Green Blue Corridor.	4	This is not identified as a green/blue corridor. It is thought this comment may relate to policy NE2 within the adopted local plan. However, it is not proposed that this will be carried forward into the emerging plan.

Comment	Site referred to	Detail	Number of reps	Officer response
Insufficient junction or road infrastructure to handle traffic at Newton Manor Lane and other surrounding roads	59	Newton Manor Lane is former farm track and features non-standard St Thomas Cross junction which will not provide safe access to the site and create further congestion. No footpath along the road which is unsafe and no reference to upgrades to make it safer	113	See body of report - Newton Manor Lane, Brownsover

Comment	Site referred to	Detail	Number of reps	Officer response
Multiple constraints affecting proposed secondary school site relating to walking access, lighting, connectivity, traffic, heritage and environmental impact	School	WCC requires new school sites to be free from constraints but the St Thomas Cross site is affected by uneven site ground, PROW, electricity cables, Cemex slurry pipeline, archaeological interest site and very poor road connectivity limiting active travel to school and posing safety issues. The Coton East site is better suited	124	The school site will not be taken forward as an allocation, with reference to updated school place evidence.

Comment	Site referred to	Detail	Number of reps	Officer response
No facilities available in Newton	59	No primary school, shop, GP or post office available in Newton, necessitating significant daily car use	1	We think site 59 relates more to the edge of Rugby than the village of Newton.
Allocation scale will damage character of Newton village	59	Allocation of 285 units to a village with 147 dwellings in 2024 represents an increase of 163%. This would destroy Newton's character and identity	3	As above.
Lit cycleways and footpaths are required	59	Site should be linked to the rest of the village by cycleways and pathways and connect to Brownsover/Coton Park networks	5	Noted. Suggestions from colleagues in the active travel team at WCC have been incorporated into the development requirements.
Insufficient school provision locally	59	Existing school provision is overstretched with little capacity to accommodate new residents	2	This comment is not specific about whether it is referring to primary or secondary or both. Evidence relating to school place provision will be published at Regulation 19 stage.

Comment	Site referred to	Detail	Number of reps	Officer response
Loss of green spaces through greenfield development	59	Opposition to destruction of local countryside and use of greenfield land. Site holds recreational value for local people and contributes to wellbeing. Damage to the setting of Great Central Walk. Lack of green space in Coton Park/Brownsover area	57	See body of report - Newton Manor Lane, Brownsover
Disruption to existing residents from noise	59	Noise and traffic both during construction period and once the development is completed	7	Construction management is usually considered at planning application stage.
Already major developments underway around Rugby	59	6000 homes at Houlton and ongoing works at Ashlawn Road, SW Rugby should be sufficient. Overdevelopment around the town	10	See body of report - Newton Manor Lane, Brownsover
Increase in impermeable surfaces will increase flood risk	59	Built development will increase water volumes onto the Avon flood plain and increase flooding on neighbouring residential roads and at Elliot's Field and railway station bridge. Already flooding at St Thomas Cross and within Brownsover. Increasing flood risk elsewhere is against policy EN6. No flood alleviations proposed.	81	See body of report - Newton Manor Lane, Brownsover

Comment	Site referred to	Detail	Number of reps	Officer response
Overstretching of local amenities and infrastructure	59	Lack of hospital or medical facilities to support the scale of growth. Main water supply regularly burst due to increased pressure from existing overdevelopment - unable to handle further development	34	See body of report - Newton Manor Lane, Brownsover
Loss of productive farmland	59	Land should remain as agricultural land. Undermines government work to improve food security	22	See body of report - Newton Manor Lane, Brownsover
Previous allocation at Coton Park East for the school was more suitable	School	Allocated land at Central Park Drive would be more appropriate as a school due to proximity to housing. New proposed location will encourage driving, at odds with national and local policy	46	A location for a secondary school was identified on a temporary basis in the adopted local plan. This option has since expired, and is no longer an option. In any event, the allocation for a new secondary school will not be taken forward.
Destruction of wildlife habitats	59	Further encroachment on green space destroying natural habitats and harming local wildlife. Proximity to Great Central Walk will be damaging to ecosystems. At odds with objectives 3 and 6	45	See body of report - Newton Manor Lane, Brownsover

Comment	Site referred to	Detail	Number of reps	Officer response
No objection with traffic mitigations	59	No objection to the site if St Thomas Cross junction is improved	1	Noted.
Existing developments proposals in Brownsver already and new builds still vacant	59	Vacant homes 12 months after completion at Persimmon site. Development planned at former GE site and by Holloway Way - lack of need for further housing here	4	The local plan identifies allocations to meet the evidenced need.
Potential harm to historic setting of pub	59	Modern housing and a school could harm the setting of the historic St Thomas Cross pub	1	The Stage 2 Site Assessment notes no designated heritage assets within 50m of the site.
Improvements to the old railway line footpath required	59	Footpath is currently too muddy for use during winter. Improvements such as resurfacing would enable use on foot and by bicycle all year round	2	The Local Cycling and Walking Improvement Plan refers to the Great Central Walk. The development requirements have been updated to identify that contributions towards such improvements may be required.

Comment	Site referred to	Detail	Number of reps	Officer response
Scale of development rather than principle is opposed	59	Respondent does not object to the site in principle but feels scale is inappropriate to the area and will overburden local amenities	1	Noted. As above, we think this site relates more to the edge of Rugby rather than the village of Newton.
Site has potential archaeological interest	59	Site contains medieval ridge and furrow with potential archaeological interest	5	The Stage 2 Site Assessment notes ridge and furrow, likely connected to Biggin abandoned medieval settlement.
Proposed school is too costly	School	Difficulty of location could cause construction costs to exceed £60 million, putting pressure on S106 contributions and reducing options for affordable housing and green infrastructure across the borough. Location will also generate significant school transport costs	3	The school allocation is not being taken forward based on the latest evidence.
Clarion is unsuitable provider of homes	59	Housing Ombudsman found severe maladministration by Clarion Housing Association. Would not provide quality housing to Rugby residents	1	This is not a matter for the local plan allocation.

Comment	Site referred to	Detail	Number of reps	Officer response
Park or open space provision should be included	59	Lack of sufficient green and open space in the area. Parks have been demolished and Coton Park playground affected by fumes from nearby factory	1	Open space would be required on this space in accordance with other policies in the plan.
Other amenities needed more than new schools	59 (and others as applicable)	Proposals should include new supermarkets and GP surgeries, not just schools	1	It is understood that this comment may relate to sites more generally. The development requirements in the annex highlight infrastructure and amenities where possible/justified.
More suitable sites for a school in Eden Park	School	School sites in Eden Park are more accessible and suitable than at Newton Manor Lane	1	The site previously identified for a secondary school will no longer be taken forward.

Comment	Site referred to	Detail	Number of reps	Officer response
Extension to existing schools preferable to proposed location	School	St Thomas Cross site is unsuitable, if no better site can be found then preferable to expand Avon Valley or Houlton schools	1	The site previously identified for a secondary school will no longer be taken forward. The expansion of existing schools will be pursued instead.
Non-car modes of travel not possible	59	No bus connections, cycle pavements or paths along the access road. Not a sustainable location	3	We disagree, and will include further development requirements related to active travel in the annex as recommended by active travel colleagues.
Excessive scale of development	59	240 homes is too many	1	We disagree. We think this is a reasonable extension at the edge of the urban area.

Comment	Site referred to	Detail	Number of reps	Officer response
Support for a new secondary school/expansion to schools	School	Currently no good secondary school in the area and primary school lacks green space	4	Noted. As above, it is now proposed that existing schools will be expanded in preference to an allocation for a new school.
Newton does not need a secondary school	School	Newton is a small village and does not need a secondary school. Children would have to travel to a rural location to attend	1	The secondary school allocation is no longer included.
Green Belt land which should not be developed	59	Respondent says the land should not be developed as it is Green Belt	4	This land is not designated green belt. Is is however green field.

Clifton upon Dunsmore

Settlement name:	Clifton-Upon-Dunsmore
Number of representations referencing settlement:	70 individuals
Names of organisations referring to settlement:	Clifton-Upon-Dunsmore Parish Council

Comment	Site referred to	Detail	Number of reps	Officer response
Detracts from the village's historic character	129	Site is adjacent to Grade II listed Old Manor and within a conservation area. Location stops the Old Manor from being the gateway to the village, damaging its character	12	See body of report - Clifton upon Dunsmore
Site is located outside the settlement boundary	129	No measures proposed to help the site blend into the landscape despite position on the edge of the village and proximity to heritage assets	1	Settlement boundaries may be amended as a result of allocations in the emerging local plan. Landscape has been considered in the site selection process as set out in the Stage 2 Site Assessment.

Comment	Site referred to	Detail	Number of reps	Officer response
Site is best of those allocated in the village but not ideal	202	Traffic would be able to exit/enter without passing through the village itself	1	Noted.
Lack of suitable access roads or paths	129	Lilbourn Rd is badly paved and has no footpath linking to the village as well as being poorly drained and subject to surface flooding. Buckwell Lane is small and unsuitable for increased traffic	12	See body of report - Clifton upon Dunsmore
Lack of access both during construction and once built	307	Traffic on North Road is congested at school pick-up/drop-off times and the road has often become impassable during construction periods	20	See body of report - Clifton upon Dunsmore
Addition of children's play provision needed for site of this scale	202	Site with 80 houses not located near to playing fields or parks should include a play park as an essential part of the development, although number of houses would then be reduced	2	See body of report - Clifton upon Dunsmore

Comment	Site referred to	Detail	Number of reps	Officer response
Preservation of existing woodland and greenery is essential	202	Manor Lane should be preserved to screen the new houses from the village centre and to preserve the trees and green corridor it provides. The wooded copice on approach from Newton should also remain	3	See body of report - Clifton upon Dunsmore
Requirement for 30% affordable homes	202	Draft Neighbourhood Plan requires the site to include 30% affordable homes as well as bungalow provision	1	Policy H2 sets out the affordable housing policy for new developments. 30% is included.
Scale of the larger strategic site proposal is too large for a small settlement	335/ 238	150 homes with a potential to expand to 700 homes if Phases 2 and 3 were permitted would change the character of the village (c.400 homes at present) and place too great a burden on services, infrastructure and roads	12	See body of report - Clifton upon Dunsmore

Comment	Site referred to	Detail	Number of reps	Officer response
Concern for future development which would be unsustainable	83	Potential for 180 homes at non allocated site 83 is a concern for the PC and would not be considered sustainable	1	This comment relates to planning applications which have been submitted/ are anticipated on omission sites. We recognise the concern and will monitor the outcomes.
Site is mainly arable land	335	Loss of arable land rather than the grazing fields in other locations	2	See omission sites in report
Impact on surrounding views from Clifton as a hilltop settlement	335, 129, 202	Loss of views from the PRow from South Road to Hillmorton Lane. Loss of views from Clifton towards natural sites such as Bluebell Wood, Canal and Clifton Brook. View from site 202 was previously grounds for rejecting a planning application	5	See body of report - Clifton upon Dunsmore
Site is a key habitat site	335	The site is home to newts, grass snakes, red kites and other wildlife	1	See omission sites in report

Comment	Site referred to	Detail	Number of reps	Officer response
Site is somewhat removed from the village encouraging use of private vehicles	335	School is 0.75km away but many will still drive exacerbating existing parking and reversing issues. Increase in cars on this scale will also create further issues at Vicarage Hill/Houlton Way/Clifton Road junction	4	See omission sites in report
Very limited public transport provision despite Marrons' statement. Limited options for active travel due to lack of paths/cycle lanes	129, 202, 307, 335, 33	One bus route which runs up to every 90 mins but often with larger gaps. Lack of suitable paths or cycling routes	19	See body of report. Not listed under omission site as considered to apply to sites across Clifton.
Roads will become more congested and dangerous	129, 202, 307, 335	Roads are already congested especially at school start and finish times and there are significant parking issues. Bus has to drive partly on the grass to pass parked cars. Traffic has increased significantly since development at Houlton including HGVs despite 7.5T limit. Increased air pollution when levels are already above EA guidance	58	The Strategic Transport Assessment models traffic impacts and identifies mitigations.

Comment	Site referred to	Detail	Number of reps	Officer response
Primary school is at capacity	129, 202, 307, 335	School is unable to expand beyond its current site and already attracts students from beyond the village. Some Clifton children were unable to secure places. Drop off and pick up is already unmanageable for car parking	28	It is our evidence and the advice of the Loal Education Authority that there would be sufficient capacity in the primary school to accommodate the scale of growth proposed.
No local need for more housing	129, 202, 307	Houlton has many unoccupied houses - respondent doubts calculations for housing requirement. Any housing should be smaller homes suitable for older people or starter homes as per neighbourhood plan	4	See body of report - Clifton upon Dunsmore
Impact on farming operations	202, 129	Inappropriate for housing to be built adjacent to working farms. Farm houses cattle and pigs all year round which could impact residents. Development will reduce farming operations by 12% according to respondent	2	These sites have been put forward for consideration, and our assessment of them are outlined in the evidence base.

Comment	Site referred to	Detail	Number of reps	Officer response
Need for sewage pumping facility due to lack of existing infrastructure	202, 129	No public sewer for part of these sites which will require new facilities including pumping. Risk of overflow or flooding based on previous incident in Newton	9	See body of report - Clifton upon Dunsmore
Support for current site allocations totalling 150 homes but no more	202, 129, 307	150 houses could be appropriate levels of growth for the village but anything beyond this such as site 335 is disproportionate and not supported	2	See body of report - Clifton upon Dunsmore
Lack of good quality internet connection	202. 129. 307	Poor broadband provision currently, OpenReach has some limited plans for improvement by end of 2026	7	See body of report - Clifton upon Dunsmore
Objection to any further housing in the village	any and all	-	4	Noted as in body of report
Lack of day to day amenities in the village and strain on those in town	202, 129, 307	No GP, dentists, post office and very limited shops. Not an example of being 'infrastructure led'. Increased strain on those available		See body of report - Clifton upon Dunsmore
Additional housing for the parish should be located at Houlton	202, 129, 307	More services available at Houlton to meet needs of new residents	8	See body of report - Clifton upon Dunsmore

Comment	Site referred to	Detail	Number of reps	Officer response
Additional housing is not in keeping with existing built form	307	Location of site 307 on the corner of North Road is at odds with existing road layout and will erode the current settlement boundary	2	See body of report - Clifton upon Dunsmore
Scale of development will alter the character of the village and overwhelm infrastructure	129, 202	150 new homes will increase village size by around 30%, altering its character and eroding the identity. Infrastructure is unable to sustain this level of growth	18	See body of report - Clifton upon Dunsmore
Increase affordable housing to 40% and ensure high numbers of smaller homes and bungalows	129, 202	Ensure there are smaller homes for first time buyers, bungalows for older people and affordable homes for social renters in addition to the larger homes usually built by developers	6	See body of report - Clifton upon Dunsmore
Water pressure issues from recent development	129, 202	Additional water supply provision needed to ensure additional demand does not exacerbate issues	4	See body of report - Clifton upon Dunsmore
Preferable site which could add additional affordable or accessible houses to the village	202	Potential for sympathetic home design to be developed here to improve housing mix	1	Noted.
Increase in flood risk by building on areas of high runoff	202	High surface run off from farming land which would increase flood risk from impermeable surfaces	8	See body of report - Clifton upon Dunsmore

Comment	Site referred to	Detail	Number of reps	Officer response
No consideration of the Clifton Neighbourhood Plan	202, 129, 335	Preference for small-scale sites and housing for older people contained in the emerging neighbourhood plan is not reflected in the site allocations	1	The Clifton upon Dunsmore Neighbourhood Plan has been submitted for Examination at the time of writing and is not formally made.
Loss of natural habitat sites and impact on wildlife	129, 202	Loss of key habitat sites for species such as bats, red kites, foxes and rabbits	8	See body of report - Clifton upon Dunsmore
Loss of active and good quality agricultural land	129, 202	Sites are currently used for grazing and are grade 2 and 3 ALC. Loss of habitats, livelihoods and village farming identity	7	See body of report - Clifton upon Dunsmore
Harm to PRow	202	Footpath through site 202 is popular and well-used. Character needs to be protected from development	4	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
By-pass would be required to support increase in traffic	202, 129	A short stretch of new by-pass road would be needed to direct traffic away from the centre of the village to link Newton Road north of Clifton to an improved junction with Lilbourne Rd and Hillmorton Rd. Traffic management systems needed to deter cut through use of the village	1	We have no evidence to support this assertion
Support for site 307 but not others	307	Preference for this site over any others due to integration within the village and smaller scale	2	Noted.
Alternative site should have been taken forward	238	Site 238 accessed from Rugby Road had options for different scales of development and should be reconsidered. Lower grade farmland	4	See omission sites in report
Site capacity is increased from the HELAA	129	HELAA gives capacity as 50 units but allocated for 60. This will lead to overdevelopment	3	Capacities are indicative and based on the best information available. They are not a target nor a cap if through a planning application a different housing figure is achievable.

Dunchurch

Settlement name:	Dunchurch
Number of representations referencing settlement:	231 individuals
Names of organisations referring to settlement:	Dunchurch Hall Residents, Action4Dunchurch, Dunchurch Parish Council

Comment	Site referred to	Detail	Number of reps	Officer response
Request for preservation of land to the rear of Dunchurch Hall as Local Green Space	Any future Dunchurch development	Land to the rear of Dunchurch Hall has a notable SE view across the Rainsbrook Valley and features historic land formation called a haha. The group request it be designated a Local Green Space to preserve its heritage and landscape value. Land is currently run by Warwickshire Wildlife Trust	1	The plan does not propose to designate Local Greenspaces. These could be designated (subject to meeting the criteria) through development of a neighbourhood plan.
Allocations at Dunchurch do not logically relate to the future link road	341, 90	Access to the sites will be challenging following development of the Homestead Link Road	1	These sites will not be taken forward as allocations.

Comment	Site referred to	Detail	Number of reps	Officer response
Link road needs traffic calming measures	South West Rugby, Homestead Link Road	Traffic calming measures needed on link road, especially close to residential areas such as Montague Road to reduce impacts on residents and wildlife	1	As the additional allocations at Dunchurch are no longer proposed to be taken forward, the design of highway infrastructure relates only to the existing allocation at South West Rugby and the safeguarded land.
Request for landscaping to be completed first to screen development from residents	South West Rugby, Homestead Link Road	Request that landscaping and shrub buffer is done first rather than last to minimise impacts on existing residents	1	It is understood that this comment relates to development at South West Rugby, for which there are live planning applications at the time of writing.
Concerns around SW Rugby development	South West Rugby	Respondent gives concerns from the SW Rugby proposals including loss of agricultural land, strain on utilities, increased road congestion, lack of guaranteed delivery of schools, limited low cost housing provision, lack of guarantee for proposed tree planting and hedges	1	South West Rugby is allocated in the existing local plan. There is an adopted masterplan SPD and Design Code SPD. There are also live planning applications at the time of writing.

Comment	Site referred to	Detail	Number of reps	Officer response
Scale of growth proposed is disproportionate and will lose village identity	341, 90	The proposed developments will increase Dunchurch by over 140% which would convert it from village to functional suburb of Rugby. Loss of tranquillity and historic character. Dunchurch is home to 12 listed buildings as well as heritage value from surrounding rural landscape. Much of the centre is a conservation area. Dunchurch is already absorbing the SW Rugby allocation	146	See body of report - Dunchurch
Exacerbation of existing road and air quality issues, lack of parking provision	341, 90	A426/A45 junction already operates over capacity with High concern level assigned by National Highways for cumulative traffic impacts. Located within Air Quality Management area. B4429 is already very busy. Large numbers of cars and HGVs travel through the village at speed already. Lack of safe parking within village centre	144	See body of report - Dunchurch

Comment	Site referred to	Detail	Number of reps	Officer response
Insufficient infrastructure to accommodate scale of new residential developments	341, 90, 73	Primary schools are forecast to have a 100 place deficit for 2025 entry and GP surgery is operating at 110-136% of designed capacity. The planned drainage system at SW Rugby is only partially delivered and sites 341 and 73 lie in higher risk flood zones. Lack of efficient public transport in the area and most new sites are over 800m from a frequent bus stop and 341 is ranked PTAL 0	151	See body of report - Dunchurch
Impact on natural landscape, habitats and potential impact on SSSIs	341	Landscape Sensitivity Assessment rates Coventry Road edge as High-Medium as forms the transition between open countryside and historic village. Development would intrude on this. Area of wildlife habitats and mature trees will be lost. Impacts on the Rainsbrook Valley. 341 falls within the Impact Risk Zone for Draycote Meadows SSSI but no mitigation strategy is mentioned.	124	See body of report - Dunchurch

Comment	Site referred to	Detail	Number of reps	Officer response
Loss of high quality farmland	341	Best and Most Versatile farmland should be retained as per 187b of NPPF	41	See body of report - Dunchurch
Encroachment on bridleway and damage to natural habitats	90	Disruption to local wildlife habitats and damage to popular bridleway	16	This site is no longer being taken forward as an allocation
Loss of high quality farmland	90	Best and Most Versatile farmland should be retained as per 187b of NPPF	3	This site is no longer being taken forward as an allocation
WCC's confirmation the school had capacity for new houses did not include Dunchurch Fields	90, 341	WCC said the school could cope with 250 houses but this figure does not include the 86 new houses being built at Dunchurch Fields on Daventry Road, bringing the upcoming development to 296 houses	1	Sites 341 and 90 are no longer being taken forward as allocations.
Dunchurch is already affected by SW Rugby, Symmetry Park and Dunchurch Fields	90, 341	Significant increase in traffic, noise and pressure on services from these existing sites - lack of capacity to accommodate further allocations	21	See body of report - Dunchurch

Comment	Site referred to	Detail	Number of reps	Officer response
Strain on old drainage and sewage systems	90, 341	Recent burst pipes and flooding due to old infrastructure, unable to handle new housing without upgrades. Increase in nitrogen	12	These sites will not be taken forward as allocations.
Dunchurch Bypass proposals are poorly designed		Current bypass is ineffective. Requirement for more roundabouts and space for pedestrians and cyclists to pass underneath the new road	3	This is not related to new proposals in the local plan.
Overconcentration of allocations around Dunchurch	90, 341, 73	Combination of SW Rugby with further large scale proposals such as 341 and Lodge Farm are disproportionate to Dunchurch. Calls for greater dispersal	22	See body of report - Dunchurch
Housing will be out of character for the rest of the area	90, 341	Difference in density and design will make the new developments feel out of place and damage the identity of the village	5	These sites will not be taken forward as allocations.
Potential for continued infill development breaching gap between Dunchurch and Thurlaston	341, 90, 42, 133	Infill through 90 and 341 sets a precedent for further development towards Thurlaston as demonstrated by site 42 marketed by Severn Trent	4	We are introducing an area of separation policy, and sites 341 and 90 will not be taken forward as allocations.

Comment	Site referred to	Detail	Number of reps	Officer response
Degradation of National Cycle Network route 41 on Halfway Lane	90	Impacts including heavy traffic, pollution and loss of landscape/setting	17	Site 90 is no longer proposed as an allocation.
Lack of need for more housing in the area	341, 90	Already significant growth around Dunchurch and no need for further housing in this area	8	This is a similar point to the one which refers to Dunchurch already absorbing South West Rugby. The officer response to that point is in the body of the report.
Significant periods of disruption from construction work	341, 90	Impacts from works traffic, noise, dirt on residents and businesses in the area from lengthy construction projects	7	Construction management plans would usually be considered at application stage, however these sites are no longer proposed as allocations.
No further houses built south of Coventry Road to ensure safe operation of the link road	341, 90	Increasing housing numbers here will counteract any benefits in traffic reduction	1	These sites will not be taken forward as allocations.
Proposed alternative site on Southam Road	341, 90	Site owned by WCC and adjacent to grit storage facility which is likely to	4	Noted.

Comment	Site referred to	Detail	Number of reps	Officer response
		become obsolete in future due to new site in Rugby		
Lack of recreational outdoor spaces	341, 90	Persistent lack of high quality outdoor recreational space in Dunchurch which is required in national policy for development in rural areas	1	Sites 341 and 90 are no longer proposed for allocation.
Development within AQMAs requires consistency with action plans	341, 90, 73, 17	Dunchurch lies in the RBC Air Quality Management Area due to high level of NO2 - latest report confirms continued high levels requiring cumulative traffic effects to be considered for all new developments	3	Sites 341 and 90 are no longer proposed for allocation. Site 73 is an omission site.
Lack of public transport links encourages further use of private car	341, 90	Inconsistent with NPPF policy requirements for encouraging active travel and reducing car use	5	These sites will not be taken forward as allocations.
Sites are not sufficient in size to accommodate dwelling numbers	341, 90	Sites will be too cramped to accommodate 210 houses between them and lack sufficient access	1	These sites will not be taken forward as allocations.

Comment	Site referred to	Detail	Number of reps	Officer response
Site 25 encroaches on Green Belt land	25	No feasible access and would require significant reconfigurations. Encroaches on Green Belt land	1	RBC response: Site not progressed beyond Stage 2
New housing will be impacted by the Homestead Link Road	341, 90	Noise, emissions, safety and drainage issues for new homes from the Homestead Link Road development	1	These sites will not be taken forward as allocations.
New homes will not be affordable for first time buyers or those who are waiting for social housing	341	Already sufficient larger 4-5 bedroom homes, no demand for more	1	Affordable housing provision is addressed in policy H2 and housing mix in H1. However, these sites are no longer proposed allocations.
B4429 keep left signs need to be tarmacked	341, 90	Current conditions are very loud due to the large amount of traffic	1	These sites will not be taken forward as allocations, and this matter is outside the scope of the local plan process.

Hard copy letter summaries – delivered by hand. Action for Dunchurch

Summary of content	Number received	Officer response
<ul style="list-style-type: none"> • Combination of 5000 homes in SW Rugby, Tritax warehousing development, 84 homes on Coventry road and 2680 homes at Lodge Farm represents disproportionate and overconcentration of development at a historic village • Option 1 - Dispersed Growth in the sustainability appraisal is a fairer more sustainable approach • Lodge Farm is an unsuitable strategic site which was removed from the previous Local Plan at examination with no change in the circumstances • Development should be dispersed across the borough rather than only being concentrated at Dunchurch. Land available elsewhere is not being used 	23 letters	Residential allocations 90 and 341 will not be included in the proposed Submission Plan. Lodge Farm is not proposed as an allocation (see Omission Sites elsewhere in report). Site 17 (South West Rugby safeguarded land) is addressed under policy S7.

Summary of content	Number received	Officer response
<ul style="list-style-type: none"> • Air Quality Management Area designated in 2004 has not been resolved and NO2 levels remain above the recommended levels at roadside locations in Dunchurch. Further development will exacerbate pollution challenges • Dunchurch crossroads already operate over capacity at peak hours with no mitigation measures in place. Committed and future developments will add stress to road infrastructure and divert more traffic onto village roads • Lodge Farm would add more traffic onto Dunchurch roads due to its isolated location and absence of transport provision • Option 1 - Dispersed Growth model would offer a better alternative with reduced impacts on the roads and air quality by allocating development across the borough and in more suitable locations in line with national policy 	25 letters	Residential allocations 90 and 341 will not be included in the proposed Submission Plan. Lodge Farm is not proposed as an allocation (see Omission Sites elsewhere in report)

Summary of content	Number received	Officer response
<ul style="list-style-type: none"> • Dunchurch is a historic village, not a growth zone, containing listed buildings and conservation area. Contrary to national policy to make large-scale allocations at the settlement • RBC landscape assessments classify the surrounding areas as being of 'medium sensitivity' with strong rural character. Development would harm the village setting and landscape buffer with Rugby town • Lodge Farm development would bring cumulative damage to the settlement and further dilute the historic setting with addition vehicle traffic through the village • S1 settlement hierarchy policy has been misapplied in allocating this scale of development at Dunchurch 	29 letters	Residential allocations 90 and 341 will not be included in the proposed Submission Plan. Lodge Farm is not proposed as an allocation (see Omission Sites elsewhere in report)

Summary of content	Number received	Officer response
<ul style="list-style-type: none"> • Dunchurch has poor public transport provision with infrequent and limited bus services and no viable links to key facilities such as healthcare, education or employment from many parts of the village. Allocations here undermine modal-shift goals • Village is cut off from wider active travel routes with significant safety risks for walking to school and work. No cycle routes to major employment sites nearby such as Tritax. Car is therefore the default for most journeys • At odds with national policy which requires development in sustainable locations with non-car access modes <p>Development of Lodge Farm in an isolated location would further entrench car-based travel and exacerbate strains on Dunchurch's roads</p>	24 letters	Residential allocations 90 and 341 will not be included in the proposed Submission Plan. Lodge Farm is not proposed as an allocation (see Omission Sites elsewhere in report)

Summary of content	Number received	Officer response
<ul style="list-style-type: none"> • Additional housing would exacerbate existing pressures on Dunchurch roads • Development threatens local wildlife habitats and green spaces • Local services would be stretched beyond capacity • Large-scale development would erode the historic setting and heritage of the village • Alternative approaches such as brownfield sites and infrastructure improvements needed before these proposals are pursued 	519 letters	Residential allocations 90 and 341 will not be included in the proposed Submission Plan. Additional brownfield sites have been identified in the town centre.

Summary of content	Number received	Officer response
<ul style="list-style-type: none"> • Both primary schools are already at capacity with no space to expand and nurse provision operates with waiting lists. SW Rugby will already increase local population but plan makes no reference to mitigations • GP surgery is already close to capacity (8200 patients with a capacity of 10,000) and local NHSA has no plans to expand it. Combination of local allocations with Lodge Farm would overwhelm local provision • Proposals are at odds with national policy which requires development to make sufficient provision for education, healthcare and road capacity • Lodge Farm is an isolated site with no clear proposals for when any onsite infrastructure would be delivered. Dunchurch services would need to absorb the early impacts of the development 	14 letters	Residential allocations 90 and 341 will not be included in the proposed Submission Plan. Lodge Farm is not proposed as an allocation (see Omission Sites elsewhere in report)

Summary of content	Number received	Officer response
<ul style="list-style-type: none"> • Respondents have serious concerns about the impacts of sites 90 and 341 on existing infrastructure, healthcare provision and local environment in Dunchurch • Development should be focused on brownfield sites in Rugby town rather than harming historic villages 	12 letters	Residential allocations 90 and 341 will not be included in the proposed Submission Plan. Additional brownfield sites have been identified in the town centre.

Summary of content	Number received	Officer response
<ul style="list-style-type: none"> • RBC are exceeding targets by 1500+ units with an additional 5000+ units committed in the areas around Dunchurch • Over 800 units have already been identified on brownfield sites in existing communities • Further development would add additional pressure to the overstretched road network in Dunchurch • Development threatens local wildlife habitats and green spaces • Local services would be stretched beyond capacity • Large-scale development would erode the historic setting and heritage of the village • Current warehouses are underoccupied and recruit from outside the local area • Further warehousing will lead to light pollution, harm wildlife and worsen traffic conditions and vehicle noise 	3 letters	Residential allocations 90 and 341 will not be included in the proposed Submission Plan. Safeguarded land (site 17) is addressed under policy S7.

Summary of content	Number received	Officer response
<ul style="list-style-type: none"> • Additional allocations at site 90 and 341, alongside 5000 committed units will worsen congestion on local roads with noise pollution for residents and safety impacts on the national cycling route 41 • Lack of capacity to accommodate additional residents at local schools and doctors • Safeguarded land at site 17 should be used for residential, not warehousing, to remove the need for further housing at Dunchurch • Traffic calming measures needed at entry points to the village 	3 letters	Residential allocations 90 and 341 will not be included in the proposed Submission Plan. Safeguarded land (site 17) is addressed under policy S7.
TOTAL	652 letters	

Hillmorton

Settlement name:	Hillmorton
Number of representations referencing settlement:	222 individuals
Names of organisations referring to settlement:	Barby & Onley Parish Council, Crick Road Residents, Kilsby Action Group

Comment	Site referred to	Detail	Number of reps	Officer response
Impact on biodiversity, environment and landscape of the Rainsbrook Valley and loss of buffer	40, 334	Loss of ecological and visual buffer Rainsbrook Valley between Rugby and Barby village, changing the character of the landscape and setting of the village. Damage to wildlife corridors, biodiversity and protected view 334. Landscape Sensitivity Assessment classification of Low/Medium appears misjudged. Contrary to NPPF 186a and b and previous 2016 Landscape Study. Examples of previous refusals locally on the basis on landscape sensitivity (R15/2039, R17/0431, R17/1891)	172	See body of report - Hillmorton

Comment	Site referred to	Detail	Number of reps	Officer response
Overstretching of local amenities in Hillmorton	40, 334	Additional residents in Hillmorton could place too high a burden on already overstretched education, infrastructure and community facilities in Hillmorton and medical services in Rugby, with lack of A&E or other facilities. No proposals for additional services included	135	See body of report - Hillmorton
Increased congestion on key junctions and roads through Hillmorton and towards Onley and Barby	40, 334, (338)	Exacerbation of existing gridlock at peak times on the main Hillmorton roads and hazardous Barby Road-A428 junction which is affected by parking with major impact on residents accessing work, school and facilities. Roads are not designed to support large scale use. Limited public transport provision (low PTAA score). Congestion would be cumulative alongside site 334 and 338 leading to possible 1510 increase in vehicle journeys. Lack of modelling evidence available at Reg 18. Access points at 334 and 40 are unsuitable	179	See body of report - Hillmorton
Planning permission previously denied 2022	40, 334	Planning permission was refused in 2022 for 130 dwellings (R15/1366) partly due to the significant impact on the natural landscape. Limited potential for change since then. Previous refusal on landscape grounds in the area in 2018	15	Acknowledged. Further landscape work has been commissioned.
32% of the site allocation is currently for sale	40	1.56 ha or 32% of the site is for sale and marketed as a large open storage space with B1/B2 use. This could conflict with the proposals to develop the	2	Noted. This site will no longer be taken forward as an allocation.

Comment	Site referred to	Detail	Number of reps	Officer response
		site as a residential site or reduce the number of dwellings		
Increased flood risk rating since Options draft was published	40	EA has updated its flood maps meaning the site is at higher risk. The addition of impermeable surfaces to the site may raise surface water flood risk further	2	This site will no longer be taken forward as an allocation.
Loss of agricultural land	40, 334	Site is productive farmland including grade 2 which contributes to region's heritage and local economy	12	These sites will not be included as allocations.
Area has already absorbed significant growth from Houlton, lack of further need or obligations	40, 334	Further development is overstressing the area and disproportionate. Lack of many core facilities at Houlton brings people to Hillmorton. Other parts of the Borough/country should take on burden of next developments	34	See body of report - Hillmorton
Lack of school capacity	40, 334	Primary school has already reached its capacity requiring new residents to travel by road elsewhere. Houlton and Ashlawn becoming overstretched and sometimes too full. Overall shortage of secondary places in Rugby	49	See body of report - Hillmorton
Lack of housing for local residents in the new developments	40, 334	Housing would be for people relocating from London or commuters, not local young people. Need for more 1-2 bed starter homes	6	See body of report - Hillmorton

Comment	Site referred to	Detail	Number of reps	Officer response
New sewage infrastructure required	40, 334	Historic sewer runs through the high street. Increase in housing will require a reliable pump. Site plans for 11 homes at 25 Barby Lane had to be redesigned to include special storage tanks to slow flow into main drain. Newbold treatment centre is over capacity	3	These sites will not be included as allocations.
Impact on the crematorium	40, 334	Construction and subsequent population in the area will impact peace and tranquillity of the crematorium's setting. Condition of its construction was the valley area being kept as area of natural beauty	7	See body of report - Hillmorton
Potential to set a precedent for further development	40, 334	Potential for further phases of development in the Rainsbrook Valley, losing gap between Hillmorton and Northamptonshire villages	5	We have commissioned further landscape evidence in respect of the Rainsbrook Valley with a view to creating a Special Landscape Area.
Houlton is still incomplete so cannot yet determine if further housing in the area will still be needed	40, 334	Houlton was promoted as meeting a lot of Rugby's housing need so respondent is concerned about adding further housing to this area alongside Ashlawn Road and Dunchurch developments. No local housing need given slow uptake of homes	8	See body of report - Hillmorton

Comment	Site referred to	Detail	Number of reps	Officer response
Proposed improvements to roads in the area will be insufficient to address traffic concerns	40, 334	Signalisation of Ashlawn/Barby/Onley junction will not be sufficient for further allocations in this area	1	These sites will not be included as allocations.
Road conditions are very poor with hazardous surfaces	40, 334	Housing allocations as well as the future Rugby Parkway station will further exacerbate hazardous road conditions	2	These sites will not be included as allocations.
Little to no provision for social housing in the proposals	40, 334	Housing will be unaffordable for most and not meet local needs	3	Policy H2 sets out affordable housing requirements on sites.
West Northamptonshire Council refused development on Barby Lane on traffic grounds	334	Cadman Sporting application was refused by council who said Barby Lane was not intended for this scale of traffic flow	1	Noted. Site 334 on Barby Lane will no longer be proposed as an allocation.
No safe parking available at local centre which will be exacerbated	40, 334	Lack of safe parking at parade of shops in Hillmorton creates dangerous conditions for road users from parked cars. Increase in population from new developments will exacerbate this	1	These sites will not be included as allocations.
Loss of recreational green space and views supporting community wellbeing	40, 334	Popular with dog walkers, runners and families. Lack of green and rural spaces in urban areas which is damaging for wellbeing of a community	18	See body of report - Hillmorton

Comment	Site referred to	Detail	Number of reps	Officer response
Insufficient safe pedestrian walkways and cycleways in Hillmorton to connect to other amenities or areas	40, 334	Unrealistic for children in Hillmorton to walk to schools in Houlton due to lack of safe crossing places and cycleways. Lack of safe routes within and out of Hillmorton necessitating further car journeys. Cycle lane should be required to access Rugby town centre if developed	2	These sites will not be included as allocations.
Loss privacy and reduced light on neighbouring homes	40, 334	New developments will overlook windows and block natural light reaching existing homes	2	These sites will not be included as allocations.
Best and Most Versatile farmland on site	40, 334	Some of the site is assessed at Grade 2 ALC and therefore should be properly evaluated for economic and other contributions	2	These sites will not be included as allocations.
Poor public transport connections and lack of active travel potential	40, 334	Not a sustainable location due to lack of safe walking distance from schools, shops and healthcare services. Limited options for active travel. Undermines proposals to support regeneration of Rugby town centre and active travel	3	These sites will not be included as allocations.
Currently shortage of homes in Hillmorton	40, 334	Increase in homes to buy in Hillmorton will enable respondents to buy. Employees of the area also looking to buy rather than rent away from workplace. Chance to meet local housing need given lack of growth in Hillmorton recent years	16	See body of report - Hillmorton

Comment	Site referred to	Detail	Number of reps	Officer response
Barby Lane is suitable site	334	Site is naturally screened and doesn't intrude on existing settlement character. Mature trees and hedgerows can be adapted into the development. Walkable distance to Hillmorton shops and amenities as well as sports clubs	10	Noted. However this site will no longer e taken forward as an allocation.
Lack of starter homes currently in Hillmorton	40, 334	New development has potential to help first-time buyers purchase a home	2	Noted. However, these sites will not be included as allocations.
Opportunity for more accessible homes	40, 334	Respondent welcomes chance for more accessible housing as they cannot find homes which can accommodate their disability	1	Noted. However, these sites will not be included as allocations.
CIL from the development will help support the community	40, 334	Additional funding for schools and local infrastructure would bring community benefits	3	Noted. However, these sites will not be included as allocations.
Current development requirements are too weak	40, 334	Pedestrian access from new sites to rest of the area are essential and should be made mandatory. Provision for expansion at English Martyrs Primary School should be strengthened	1	These sites will not be included as allocations.
Flooding already common near the site	40	Flooding common at lower end of Crick Road with visible surface water suggesting drainage issues. Loss natural floodplain	4	This site will no loner be taken forward as an allocation.

Comment	Site referred to	Detail	Number of reps	Officer response
Site is not Green Belt and therefore should a suitable as per national policy	334	Suitable site for development over Green Belt land	1	Noted.
Increase in housing will allow for more amenities in Hillmorton	334	Help to generate income for local shops and business and drive incentives for further amenities in the future	2	Noted. However, these sites will not be included as allocations.
Proposal to include new cycling and pedestrian routes is supported	334	The plans will increase active travel potential of the area and support the local environment	1	Noted. However, these sites will not be included as allocations.
Support for site 338 at Crick Road	338	Location next to future station is sustainable and could deliver sustainable housing	4	Noted. However, this site will no longer e taken forward as an allocation.
Harm to historic setting of the canal	40	Development at site 40 will lose the former canal route boundary which ran along the line of mature trees	1	This site will no longer be taken forward as an allocation.
Lack of consultation and use of unreliable data	40, 334	Parish councils at Kilsby and Barby & Onley oppose the allocation and have not been consulted. Analysis is based on flawed data and does not properly consider DIRT or Rainsbrook Valley from strategic perspective	1	This is a response to the consultation. These sites will no longer be taken forward.

Comment	Site referred to	Detail	Number of reps	Officer response
Development will permanently damage the character of Hillmorton	40, 334	Setting of Hillmorton and in particular Crick Road will be irreparably damaged. Setting of the canal will also be affected. Fails to meet national policy requirement for preserving local character and creating well designed places	3	These sites will not be included as allocations.
Proposed access point Florin Place is private unadopted street	334	Access proposed through Florin Place from the site to Hillmorton High Street is inappropriate given this is a private and unadopted road where residents are responsible for upkeep	1	This site will no longer be taken forward as an allocation.

Long Lawford

Settlement name:	Long Lawford
Number of representations referencing settlement:	34 individuals
Names of organisations referring to settlement:	Long Lawford Parish Council

Comment	Site referred to	Detail	Number of reps	Officer response
Junction needs improvements	316	Improvement needed to give better view of traffic leaving Rugby	2	The Strategic Transport Assessment (STA) models impacts and identifies any mitigation required.
Dangerous walk to Bilton School from Long Lawford	316	Respondent is concerned that children from Long Lawford must walk along 40mph Bilton Lane to access school. Encourages more parents to drive	1	Noted. The Regulation 19 plan will include an additional housing allocation at Long Lawford. It will be a 'development requirement' of this site, to incorporate an active travel route toward the secondary school.

Comment	Site referred to	Detail	Number of reps	Officer response
No capacity at local schools	316	No spare spaces at local school except in Reception	1	This is not the advice of the Local Education Authority which states that there is sufficient capacity within the primary school to accommodate this growth.
Already had many allocations at Long Lawford	316	Continuous development since 1990 leading to village becoming 3-4 times the size but with no infrastructure alongside it	18	See body of report
Loss of village identity and at odds with rural character	316	Village is becoming an urban extension of Rugby. Allocation is an increase of 22% of the village population	16	See body of report
Surface water drainage will be worsened and exacerbate flooding of road	316	A lot of water drains off the site and already leads to flooding of the road, causing issues for the houses either side of the park strip at Livingstone Avenue. Potential increase of flood risk to existing housing	17	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Congestion from extra traffic	316	Increased queuing at bypass junction with Lawford Road and Bretford Turn. Brinklow allocations will exacerbate further with currently 30 min tailbacks from Wolston	11	See body of report
Lack of evidence for needing Green Belt development	316	Site is proposed on the Green Belt contrary to paragraph 145 of the National Planning Policy Framework	7	See body of report
Lack of local facilities such as doctor surgery	316	Lack of availability or capacity at schools and doctors, few shops meaning residents will make regular car trips. Overstretching of existing services	34	See body of report
Housing allocations are separated from village facilities	316	Distance from existing village facilities as well as Rugby town centre will increase reliance on private vehicles. Many parents may drive to the primary school. Poor settlement layout	3	The development requirements identify the needs for improved pedestrian crossing facilities on Coventry Road, and also on-site convenience retail.

Comment	Site referred to	Detail	Number of reps	Officer response
Impact on landscape and historic assets	316	Site slopes up to the side making it visible from approaches. Directly adjacent to Avon Lodge of historic interest	1	The stage 2 site assessment notes heritage constraints, and the feedback of Historic England has been incorporated into the development requirements as reported elsewhere in this report. Landscape sensitivity is noted as medium/low.
50% of homes should be affordable due to Green Belt location	316	Minimum 50% of houses should be affordable homes to meet NPPF para 67 requirements for Green Belt development	1	Noted. Policy H2 has been amended to reflect NPPF affordable housing requirements on green belt sites.
No local demand or need for further housing	316	Lack of demonstrated local need or desire for further housing	1	The evidence for housing need is set out in the evidence base.

Comment	Site referred to	Detail	Number of reps	Officer response
Construction brings major disruption for existing residents	316	Road closures, temporary lights and extra traffic has caused major inconveniences to existing residents during previous developments and will now continue with no compensation	3	Noted. Construction Management may be subject to condition at planning application stage.
High pressure gas main runs through the site	316	High pressure gas main through the site poses significant risk to future residents	5	See body of report
Loss of agricultural land and wildlife habitats	316	Loss of the land would be harmful to economy and environment. Habitat for bats	5	See body of report
Lack of transport links in the village	316	No cycle paths or walking routes from the village and poor transport services making car journeys essential	1	As above, an additional allocation proposed would include active travel links to nearby schools and other facilities.
Pedestrian cross proposal inappropriate	316	Pedestrian crossing will make traffic worse and create further delays	1	We consider it important to provide safe crossing to facilities and services within the village.

Comment	Site referred to	Detail	Number of reps	Officer response
Request for more services in the village	316	Describes need for GP surgery, dentist, pharmacy, library and small supermarket in the village	1	A new convenience retail store is included within the requirements for site 316. The site promoter has identified a lack of a GP surgery in the village, though the Integrated Care Board (ICB) indicates no business case for a new surgery.
Request for well-lit walking access to the schools and services in Bilton/Rugby	316	Improved walkability needed to reduce car journeys	1	Noted. As above.

Newbold on Avon (site 75 – Lea Crescent)

Settlement name:	Newbold
Number of representations referencing settlement:	42 individuals
Names of organisations referring to settlement:	

Comment	Site referred to	Detail	Number of reps	Officer response
Green Belt release not justified	75	Proposal not justified and contrary to NPPF para 145	7	See body of report - Newbold on Avon (site 75)
Site not included in HELAA showing not necessary to meet housing requirements	75	Plan can be prepared without this site	1	This site will no longer be an allocation
Site at risk of flooding	75	Site frequently floods making footpaths impassable. Building in the area will only worsen this	5	This site will no longer be an allocation
Loss of habitats and local wildlife	75	Lea Crescent is important site for local wildlife with wooded areas close by	5	This site will no longer be an allocation
No infrastructure or services available locally	75	Local schools over capacity leading to longer journeys, roads are overloaded and limited healthcare provision. Other developments in the area will overburden	5	This site will no longer be an allocation
Loss of local green space	75	Loss of valued green space with impacts on people's wellbeing. Used by children for playing outside. Limited supply of open space in this area	35	See body of report - Newbold on Avon (site 75)

Comment	Site referred to	Detail	Number of reps	Officer response
Site is regularly used by local Scout group	75	Loss of community value and access to green space for local young people	30	See body of report - Newbold on Avon (site 75)
Already too many infill sites in this area	75	Recent infilling sites in Newbold at Brownsover Lane and other developments at A4071 and the Suez recycling plant leading to overdevelopment	2	See body of report - Newbold on Avon (site 75)
Visual impacts from the development	75	Loss of views which are valued by both local residents and visitors from afar	1	This site will no longer be an allocation
Increase in traffic and parking issues	75	Increased congestion on the roads and competition for parking creating challenges for existing residents	2	This site will no longer be an allocation
Loss of the bus turn	75	Loss of the bus turn which is used by many older residents who struggle to board/dismount the bus elsewhere and for drop off at the scout hut	29	See body of report - Newbold on Avon (site 75)
Land allocated for allotments better suited	75	Land on Parkfield Road adjacent to Centenary Park area is a larger site which is also available	29	See body of report - Newbold on Avon (site 75)

Comment	Site referred to	Detail	Number of reps	Officer response
Low number of units means the gains are limited	75	Significant disruption to existing residents during and after construction but only 20 homes delivered	3	This site will no longer be an allocation
Impact on area's character and setting	75	New housing will be at odds with existing character of the street, damage to the setting of the area by building over green space	2	This site will no longer be an allocation

Newton

N.b. comments relating to site 59 (Newton Manor Lane, Brownsover) are included above under the heading 'Brownsover', for reasons set out in the report.

Settlement name:	Newton
Number of representations referencing settlement:	27 individuals
Names of organisations referring to settlement:	Newton & Biggin Parish Council

Comment	Site referred to	Detail	Number of reps	Officer response
Scale of growth in Newton is contrary to Policy S1 and inappropriate	87, 59, 64	Policy S1 states that only limited development will be permitted at Other Rural Settlements which includes Newton but then allocates 265 houses, secondary school and employment area containing lorry park and G&T site. This is disproportionate to the village and will alter its character and setting	12	See body of report - Newton
No objection to residential development subject to conformity with Neighbourhood Plan and footpath/greenery retention	87	No objection is raised in principle to this development subject to it being restricted to the 1ha area, the existing hedge and trees to the eastern boundary being retained, the mix and design of the properties being in accordance with the emerging Neighbourhood Plan and the existing footpath being retained in situ.	17	See body of report - Newton
PRoW must be maintained and a pedestrian crossing installed	87	Pedestrian crossing would enable residents to safely access the playground in Newton	5	See body of report - Newton

Comment	Site referred to	Detail	Number of reps	Officer response
Request that site be used for bungalows	87	Bungalows on this site would enable existing older residents to downsize and remain in the village	1	Noted. Housing mix is addressed in policy H1. The forthcoming neighbourhood plan may address this matter.
Access to site to be from Newton Lane	87	Site should not be accessed from The Hollies to minimise disruption to existing residents. Houses near the Hollies should be set back to match existing layouts	3	See body of report - Newton
CIL from the development should improve St Thomas Cross Junction	87	Junction is in need of improvements and has not been previously funded by developers	2	Noted. Decisions on CIL spending are for Council to make.
Improvements to the roads in Newton needed	87	Increase in cars from 25 more homes plus developments on Newton Manor Lane will require improvements to the roads to reduce hazards from blind turns	1	See body of report - Newton
Hedgerows and mature trees and PRoW must be retained	87	Important habitat for local wildlife and should be retained. PRoW is a popular route	2	The development requirements state that the PRoW must be retained.

Comment	Site referred to	Detail	Number of reps	Officer response
No need for further housing in the area	87	Additional 25 houses in unnecessary where there are already so many being built in Coton Park	1	Housing need is discussed elsewhere in this report and in the evidence base.

Rugby sites

N.b. summaries relating sites 40 (Land east of Kilsby Lane) and 334 (Land off Barby Lane) are included previously under 'Hillmorton'. Summaries relating to site 59 (Newton Manor Lane, Brownsover) are included under 'Brownsover'.

Settlement name:	Other Rugby
Number of representations referencing settlement:	Site 338, Crick Road Houlton - 5 individuals Site 62, Morgan Sindall building - 1 individual Site 122, Old Laurentian Fields - 6 individuals Site 114, Cosford (Omission site) - 12 individuals

Comment	Site referred to	Detail	Number of reps	Officer response
Request to include community facilities	338	Lack of community facilities or services at Houlton to match the size - this site offers chance to add family pub or restaurant facility or other services such as dentists and doctors	2	See body of report – Land south of Crick Road, Houlton

Comment	Site referred to	Detail	Number of reps	Officer response
Site should be used for commercial opportunities, not housing	338	Poor quality site for housing. Land would be better suited to a commercial site with retail facilities, reducing traffic through Hillmorton	1	See body of report – Land south of Crick Road, Houlton
Site should not be used for social housing	338	Respondent opposes social housing at the site but does support market-rate housing	1	See body of report – Land south of Crick Road, Houlton
Cycle access and controlled pedestrian cycle crossing required	338	Take advantage of location near to a proposed station and ensure good active travel access	1	See body of report – Land south of Crick Road, Houlton
Site development should improve access from New Bilton to town centre	62	Current access routes are car focused, consideration for pedestrian access and better connectivity needed in site design	1	See body of report – Morgan Sindall House
Poor location and relationship with Rugby town	114	Separation from the town and proximity to employment land and motorway makes the site unsuitable	1	See body of report – Omission sites
Viability issues to meet draft policy H2	114	Unclear if developer can fund the required civil engineering works required	1	See body of report – Omission sites
Impact on strategic Green and Blue Infrastructure Network	114	Swift River Valley is identified as Green and Blue Infrastructure Network which would be adversely affected by construction and development	1	See body of report – omission sites

Comment	Site referred to	Detail	Number of reps	Officer response
Scale of development is inappropriate for Green Belt	114	Proposal would constitute urban sprawl and lead to substantial loss of Green Belt, compared to smaller losses at villages	3	See body of report – Omission sites
Close to an already dense urban area	114	Lodge Farm would be a preferable larger site due to be further from already populated areas	4	See body of report – Omission sites
Industrial estates would be at the centre of the proposal	114	Effectively creates a new town with industrial estates in the centre	1	See body of report – Omission sites
Cosford is a suitable proposal	114	Site has benefits such as proximity to M6, train station, new primary schools and retail parks. Potential for increasing public transport links to this area or implementing a park and ride service to reduce overall town centre traffic	2	See body of report – Omission sites
Potential for increased flooding	114	Respondent has seen reports of increased flooding if the site goes ahead - climate change makes this even more concerning	3	See body of report – omission sites

Comment	Site referred to	Detail	Number of reps	Officer response
Should be covered by the adopted SW Rugby Masterplan SPD	122	Strengthen aspects such as protection of hedges, not just mature trees, delivery of cycle routes to key destinations as per the SPD	1	This site is located outside (but close to) the existing allocation of South West Rugby. It is not included in the masterplan for this reason.
Loss of local community facility	122	New site for the Old Laurentians is not guaranteed to genuinely be suitable or accessible to current users. Should not be a green belt site	4	See body of report – Land at Fenley Fields
Site should be retained as playing fields for SW Rugby	122	Even if current team vacate the site it should be used for recreational land for the SW Rugby development	1	Noted. Our latest information means that this will not be taken forward as an allocation.
Binley Woods does not have sufficient infrastructure	Not specified	No further details	1	It is not clear what this comment refers to as no allocations were included at Binley Woods in the Preferred Option consultation.

Stretton-upon-Dunsmore

Settlement name:	Stretton-on-Dunsmore
Number of representations referencing settlement:	48 individuals
Names of organisations referring to settlement:	Stretton-on-Dunsmore Parish Council

Comment	Site referred to	Detail	Number of reps	Officer response
Lack of road/other infrastructure to support additional population and associated journeys	6, 81, 134	The intrinsic infrastructure in Stretton is not capable of servicing additional homes in the numbers proposed. The roads in and around the village are narrow and maintained with the priority of village lanes. Many are single track roads with limited pull ins and existing damage to verges and passing places. An increase in traffic would further damage the shoulders, verges and the amenity of the village as a whole. Many residents and visitors have to use on street parking. Expansion of Plott Lane would be essential	47	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Omission of Old Orchard site from allocations	NA	Old Orchard site was included in adopted Local Plan and has not been carried forward. Planning permission was refused in 2020 but the site is still available for development and is no longer in the Green Belt	2	This site has not been carried forward into the new plan. Deliverability is unclear.
Proposed allocation was previously dismissed in 2016 due to WCC Highways	81	WCC Highways refused to consider direct access to the B4455 Fosse Way in 2016 - possible that this would still be the case and should be investigated first	1	Warwickshire County Highways reviewed proposed allocations at Preferred Options Stage. We have received no indication that access would not be feasible.
Preservation of the Northern and Eastern boundaries to maintain rural character	81	Landscape view on the southern approach from the B4455 is a barrier between A45 and the village. Loss of the Northern and Eastern green boundaries would urbanise the village. Damage to the well head and brook source	3	A landscape assessment was undertaken and informed the Stage 2 Site Assessment.

Comment	Site referred to	Detail	Number of reps	Officer response
Housing density is potentially too high to maintain open or green space	134	C.125 dwellings is potentially too many for the rural setting and would not allow sufficient recreational space. There have been issues with open space at neighbouring Squires Cross development. Tree canopy cover and green corridors are essential	2	In estimating the capacity of allocation sites, allowance has been made for the provision of open space, though detail would be considered on a site-by-site basis at application stage. Tree canopy cover and biodiversity net gain are addressed in other policies in the plan.
Lack of road capacity on single carriageway Plott Lane access point	134	Currently several pinch points entering the village from the northwest. Modelling of local traffic movements and not just junctions would provide a better understanding of cumulative traffic congestion	7	This site is no longer included as an allocation in the proposed Submission Plan.

Comment	Site referred to	Detail	Number of reps	Officer response
Overstretching of foul water infrastructure	134	Foul water sewers flow through the town followed by pumps to Ryton. Severn Trent should be consulted on potential to upgrade and the scale and timeframe. Incidents of overflow in recent years	17	See body of report
Green Belt exceptional circumstances not met	81, 134, 6	Unsustainable Green Belt location which is contrary to national policy. The need for faster development timelines does not justify building on Green Belt	24	See body of report
50% of homes should be affordable due to Green Belt location	81, 134	Minimum 50% of houses should be affordable homes to meet NPPF para 67 requirements for Green Belt development	1	The plan has been updated to reflect the 'golden rules' in the NPPF.
Lack of capacity at primary school and GP surgery	81, 134	Primary school is close to full and GP surgery is already overstretched. Unable to accommodate another 500+ people in the village. Services are used by many other villages too. Village hall is overcapacity	24	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Impact on visual character and setting of the village	81, 134	New housing will be out of character for adjacent housing areas and spoil village identity. Loss of peaceful, rural setting within the Green Belt and sense of community	27	See body of report
Increase in traffic will cause noise and air pollution	81, 134	Harmful to residents physical and mental health. Loss of acceptable air quality and tranquil setting	3	Cumulative traffic impacts are considered in the Strategic Transport Assessment. Policy EN8 addresses air quality.
Potential increase in flood risk	6, 81, 134	Village is at the foot of a slope and therefore at risk from flooding. Increase in impermeable surfaces will exacerbate this further. There is heavy runoff from Plott Lane	33	See body of report
Impact on house prices for homes near green belt land	81, 134	Homeowners paid a premium to be close to Green Belt land and should be compensated for reduction in house values and loss of privacy and views	1	Property prices are not a material planning consideration.

Comment	Site referred to	Detail	Number of reps	Officer response
Proposals should include some lower cost starter homes	81, 134	Inclusion of some smaller homes for local first time buyers or for older people to downsize or move to bungalows as this is currently absent from housing stock. No appetite for more 4-5 bedroom luxury homes	5	Policy H1 addresses housing mix, and H2 provision of affordable housing. Neighbourhood plans can also influence such matters.
No understand yet of the impacts of 83 properties yet to be built	81, 34	55 homes north of Squires and 28 homes at the Old Orchard have not yet been built but will create cumulative impacts on residents and wildlife - no clear view of the extent of these effects	8	See body of report
Very limited public transport and no walking/cycling routes	81, 34	Inevitable car dependency due to lack of active travel or bus options goes against net zero targets and will increase emissions from cars	8	See body of report
Support for site 120	348	Suggestion that site 120 is actually better located for accessing the village	4	See body of report
Impact on natural habitats	134	Potential damage to vegetation, birds and local wildlife habitats including newt habitats on Plott Lane	10	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Site is productive agricultural land	134	Allocation of the site is at odds with policies which promote protection of agriculture and rural economy	4	Site 134 is not included in the proposed Submission Plan.
Site is outside the village boundary	134	Constitutes sprawl/piecemeal expansion. Outside the settlement boundary and of a scale which is inappropriate	3	Allocations are outside the boundary set out in the adopted local plan. In planning to accommodate identified needs, the settlement boundary may be amended in a new local plan.
No employment opportunities locally necessitating car-based commuting	134, 81	New housing will be purely for dormitory settlement purposes due to lack of employment within the village	2	The strategy seeks to allocate housing at Rugby and at Main Rural Settlements, where there are existing services and facilities.

Comment	Site referred to	Detail	Number of reps	Officer response
Village life is not wanted by many	134, 81	Limited access to amenities close by can put many off living in a village. Limited demand therefore for housing in these locations	1	The plan identifies allocations in a range of locations.
Request for access to EV charging facilities and parking	134, 81	Significant increase in car ownership in the village will require increase in parking provision and EV charging for the future	1	Noted. The plan seeks to align with Building Regulations in respect of EV charging.
Development will convert Stretton from a village to a Rugby suburb	134, 81	Transformation of the village with large scale developments will make it an extended suburb of Rugby	1	We disagree.
Current homeowners struggling to sell properties	134, 81	Potential buyers are put off by the current building proposals in the village. Many original homes are not selling suggesting lack of demand / impact on village appeal	1	Allocations are identified to meet the overall development needs of the borough.
Site access issues	6	Traffic often exceeds the 30mph limit along Knob Hill and Frankton Lane, possible traffic calming measures needed at the other end of Fosse Way to ensure safe access and egress	2	Noted. This is a detailed matter that may be considered through the planning application process.

Wolston

All comments attributed to Wolston are included in the body of the report.

Wolvey

Settlement name:	Wolvey
Number of representations referencing settlement:	308 individuals
Names of organisations referring to settlement:	Burton Hastings Village Meeting, Withybrook Parish Council, Stretton under Fosse Parish Council, Wolvey Parish Council

Comment	Site referred to	Detail	Number of reps	Officer response
Major loss of Green Belt land	84, 96, 309, 318, 104	Proposals would result in major loss of Green Belt land which is contrary to NPPF guidance and there has not been adequate exploration of alternatives. Updated landscape evidence contradicts previous sensitivity evidence when there has been little material change to the area. Allocation based on the assumption Green Belt boundaries may change is wrong. Green Belt should only be used as a last resort and should prevent urban sprawl.	205	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Disproportionate levels of growth which are unsustainable and over the limits of local infrastructure	84, 96, 309, 318, 104	Addition of 710 dwellings increases Wolvey Village by 200% which is not supported by RBC evidence. Services and infrastructure such as retail, medical care and schooling cannot support this locally. GP surgery in Brinklow is the provider for Wolvey meaning combined 1116 homes proposed for their catchment area. Nearest secondary school is 4.5 miles in Bedworth which would add transport costs to WCC	262	See body of report
Lack of dialogue with relevant stakeholders	84, 96, 309	It is felt that there was no meaningful dialogue with Wolvey or other Parish Councils, nor Neighbourhood Planning groups. Neighbourhood Plan has not been considered	10	See body of report
Loss of village identity and heritage	84, 96, 309, 318, 104	Rural lifestyles are being lost across the country and cannot be recovered. Very few small settlements now which don't have new estates added. Landscape prominence of Grade II* listed church in the village would be affected by site 84	116	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Traffic issues	84, 96, 309, 318, 104	Local roads are insufficient to handle extra traffic. Mainly narrow roads in the area and key junctions are already congested. Increase in traffic will make roads unsafe for all users. Increase in pollution.	231	See body of report
Detached from the rest of the village	84	Site is detached from main body of the village encouraging use of private vehicles to access local amenities	2	It is proposed that this allocation will not be carried forward.
Riverside walk and nature park do not offset landscape impacts & entrance is unsuitable	84	No certainty the park would be delivered nor any indication who is responsible for its upkeep. The PC are unable to finance this. Vehicular access to walk should be via Outfield Way not Wolds Lane. Doesn't represent 10% biodiversity gain required by policy EN4.	14	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Small-format supermarket is purely aspirational and may be unwarranted	96	Supermarket operator does not appear to have been identified and is not a guarantee, unlikely to be sufficient custom for one. If one did open this would likely put the current village store, which is an appropriate size for the population & has a much-needed Post Office, out of business. Pharmacy would be preferable	73	See body of report
Flood risk in proposed areas	96, 309, 318, 104, 84	Development will increase flood risk by removing natural boundaries, chosen sites regularly flood. Kingmakers development has already led to increase severity of flooding.	185	See body of report
Impact on local wildlife & biodiversity	96, 309, 318, 104, 84	Wolvey currently has high levels of biodiversity which will be damaged by the development		See body of report
Water, sewage, drainage and water treatment facilities are over capacity	96, 309, 318, 104, 84	High potential for CSO overflows within the village and overloading of wastewater treatment centre at Rugby Newbold. Inadequate water supply, already creates issue with pressure which will worsen.	156	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
GP & dentist services are under strain	96, 309, 318, 104, 84	Wolvey surgery is not taking on new patients and Brinklow & Bulkington surgeries are strained	190	See body of report
Lack of energy capacity	96, 309, 318, 104, 84	Demand for EV charging & heat pumps coupled with the new developments will exceed local electricity and energy supply capacity without costly upgrades	95	See body of report
Limited public transport and no active travel potential	84, 96, 309	Scores 3 out of 10 for public transport in RBC assessment and has no pedestrian or safe cycle access to major service centre	121	See body of report
50% of homes should be affordable due to Green Belt location	84, 96, 309	Minimum 50% of houses should be affordable homes to meet NPPF para 67 requirements for Green Belt development	2	This is addressed by the updated policy H2
Lit cycle path to Hinckley should be provided	96	Lit cycle path alongside existing hedgerows (field side) should link with major service centre of Hinckley	1	Noted. It is proposed that site 96 will not be carried forward in its entirety.
Loss of agricultural land	96, 309, 318, 104, 84	Reduction of local food production , loss of land for future generations of farmers & loss of agricultural jobs	89	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Impact on local recreational sites	96, 309, 318, 104, 84	Recreational sites, e.g. Makins Fisheries, may suffer due to increased human activity & potential environmental damage or be destroyed	37	See body of report
Loss of green space/public bridleways/dog/walking routes/footpaths	96, 309, 318, 104, 84	Loss of enjoyment of these by locals and visitors, impact on mental & physical well-being.	89	See body of report
Lack of high speed internet connection	96, 309, 318, 104, 84	Wolvey currently lacks fibre connectivity, development is unsustainable without this. Disruption would be caused by installation.	16	See body of report
Inadequate assessment of alternative sites	96, 309, 318, 104, 84	Alternative sites that would not encroach on Green Belt land have not been sufficiently explored	29	See body of report
Precedent for future developments	96, 309, 318, 104, 84	Approving this would set a concerning precedent for future developments within Green Belt	8	See body of report
Proposed new community centre not wanted or needed	96	Proposed new community centre is unwanted competitor to existing, extremely popular village hall	17	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Lack of demand for properties in Wolvey	96, 309, 318, 104, 84	Houses at Kingmakers View have not sold well so why would ones on proposed developments? Empty properties could lead to squatting and increase in crime and litter. Housing is for new workers but are the amount of new jobs being overestimated? Some new warehouses are sat empty. Also, will warehouse workers be able to afford houses in Wolvey.	38	See body of report
Wolvey has already had it's share of development	96, 309, 318, 104, 84	Over 100 new homes on Gallifords/Kingmaker's Site	10	See body of report
Danger of joining Coventry & Wolvey with Burbage & Hinckley	96, 309, 318, 104, 84	Plans combined with Ansty Campus, expansion of Hinckley Park & proposed new service area at J1 of M69 make this a possibility through B4109 corridor	2	We disagree that there is a risk of coalescence.
Scale of development proposed contradicts S1 of the Preferred Options Document	96, 309, 318, 104, 84	This states "Development to be of a scale commensurate with the services and facilities of the settlement in which it is located" Wolvey is the smallest settlement and the lowest ranked and yet has the highest allocation	16	See body of report
Wolvey Village Expansion Design Code not yet written	96	Questioning integrity if written after Preferred Options agreed	1	Addressed elsewhere in the Wolvey section

Comment	Site referred to	Detail	Number of reps	Officer response
Car needed to live in Wolvey	96, 309, 84	Lack of local employment, oversubscribed local services and lack of amenities means you need to drive to live in Wolvey, therefore more houses means more private car journeys. As such, plans contradict H2 (Affordable Housing) & I2 (Parking) of Preferred Options and environmental objectives of plan.	30	See body of report
Parish/Neighbourhood plan disregarded	96, 309, 318, 104, 84	All proposed sites ignore or depart from Wolvey's Parish/Neighbourhood Plan, this should inform planning decisions.	10	See body of report
Visual outlook & landscape character impacted	96	Wolvey Playing Field, Cricket Pavilion, fisheries & village from people's houses would be affected	14	See body of report
Development would effectively join Wolvey & Wolvey Heath	84	The 2 should remain distinct	3	The relationship of Wolvey and Wolvey Heath is discussed under S1
Empty buildings nearby could be adapted to dwellings	96, 309, 318, 104, 84	Hinckley & places within Rugby borough have many empty buildings that could be utilised for this purpose, more facilities there.	4	Noted. We have to identify sufficient supply of homes to meet the borough's housing need.

Comment	Site referred to	Detail	Number of reps	Officer response
Lack of Legal and Policy justification	96, 309, 318, 104, 84	No clear demonstration that development aligns with Local Plan or regional housing needs assessments. Conflicts with spatial strategy for rural settlements.	2	The rationale for the strategy has been set out in the evidence base
Emergency services - more demand means increased waiting times	96, 309, 318, 104, 84	This will have a detrimental effect on existing population, especially the elderly.	5	The needs of the health service are being considered through the duty to cooperate.
Disruption caused by long-term construction	96, 309, 84	Disruption caused by long-term construction a problem for current residents - traffic, noise etc	12	Construction management is addressed by conditions to planning applications.
Local sports club may be forced to close down	96	The proposed developments surround Wolvey Playing Field, where these clubs are based, and the new residents would not want ball sports being played due to potential of damage	5	We do not agree. Any new housing would need to be designed to respond to surrounding uses, and there is no reason for this to be a threat to the existing sports club.

Comment	Site referred to	Detail	Number of reps	Officer response
Noise & light pollution	96, 309, 318, 104, 84	Noise pollution from vehicles, people & domestic activities. Light pollution from new street lights & security lighting. Both will disturb residents & wildlife.	3	Changes inevitably result from any development, though policies seek to minimise and mitigate impacts as far as possible.
Increase in crime	96, 309, 318, 104, 84	Safety of properties at risk if village size increases & safety of existing residents, many of whom are elderly.		The intention of residential allocations and policies is to deliver new homes for people to be interested in the area and develop a strong community. We do not therefore agree that there is a direct correlation with increased crime.
Public houses	96, 309, 318, 104, 84	What happens to existing ones if development brings new 'eateries'?	1	This is not included in draft policies and would be market led.

Comment	Site referred to	Detail	Number of reps	Officer response
Confusion over the fact that Wolvey sits between Leicestershire & Warwickshire would be exacerbated by so many new residents	96, 309, 318, 104, 84	Refuse & education through Warwickshire, Post Code & health provision is Leicestershire	2	It is acknowledged that whilst in Warwickshire, Wolvey has some services delivered in conjunction with Leicestershire - for example primary care.
Close proximity to landfill site	96	Villa Farm - site was extensively used for Liquid Chemical Waste disposal up to 90s so this could present a risk	1	Noted. This site allocation has been substantially reduced in size.
Impact on Residential Amenity	84, 96, 104, 309, 318	Loss of privacy, overshadowing of adjacent properties & significant increase in noise levels	1	The design of any allocations would need to demonstrate no unacceptable impacts on existing amenity. This would be considered at planning application stage.
Cost of home insurance will increase for existing residents	96, 309, 318, 104, 84	Cost of home insurance will increase for existing residents	2	We disagree - not a material planning matter.

Comment	Site referred to	Detail	Number of reps	Officer response
Devaluation of existing properties	96, 309, 318, 104, 84	Less demand for existing houses	4	Property prices are not a material planning consideration
Lack of burial/cremation facilities	96, 309, 318, 104, 84	Already running out of these, no facilities to cater for the extra number required due to additional homes.	2	The plan does not specifically address burial space.
Development may not comply with canopy cover requirements	84, 96, 309	Policy EN5 requires major developments to achieve at least 20% post-development canopy cover, Wolvey's field boundary trees & hedgerows may not be able to meet this.	1	This would be assessed in any planning applications.
Mobile phone connectivity is already poor, more homes will further impede this	96, 309, 318, 104, 84	This is critical for day-to-day communications in a rural village, could be perceived as a risk to life	1	Communications infrastructure is addressed in policy I3.
Need for affordable properties in Wolvey is not met by proposals	96, 309, 318, 104, 84	A survey several years ago established this need	1	Affordable housing is addressed in policy H2.
Wolvey is village farthest from Rugby Town Centre	96, 309, 318, 104, 84	Therefore development costs will be higher	1	The relative distance is noted, but do not agree that this impacts development costs.

Comment	Site referred to	Detail	Number of reps	Officer response
Concerned that piling may cause structural damage to existing property	84	Existing property is 250 years old &, as such, the foundations are also so cracking may occur	1	This site is not proposed as an allocation in the proposed Submission Plan.
Neighbouring property would have to erect security fence inside garden which would block access to river	84	This would stop log jams being cleared and contribute to flooding issues	1	This site is not proposed as an allocation in the proposed Submission Plan.
Impact on Wolvey cemetery	84	People visit for the quiet, peace and beauty which will all be lost	1	This site is not proposed as an allocation in the proposed Submission Plan.
Development in Wolvey contradicts aim of rejuvenating Rugby town centre	96, 309, 318, 104, 84	Wolvey residents will not visit Rugby when Hinckley, Coventry & Fosse Park are similar distances	4	Noted.
Safeguarding issue as houses overlook school	96	Don't know who could be watching while children playing	1	This site has been reduced in size, and the retained area is not adjacent to the school.
Natural territorial boundaries will be abandoned	96, 309, 318, 104, 84	Wolvey has natural boundaries & expansion of them makes no sense & will blur the area into the surrounding ones	1	The amount of housing allocations are being reduced at Wolvey.

Comment	Site referred to	Detail	Number of reps	Officer response
Important that profile of new housing aligns with current housing	96, 309	Density of housing must not be so great as to be at variance with the rest of the village	1	Noted.
Contradiction of planning decisions	96, 309, 318, 104, 84	Planning permissions from residents of Wolvey have been rejected on the grounds of the location being in the Green Belt and because the only mode of transport is via car. This is also the case for the proposals.	1	Evidence related to green belt and exceptional circumstances will be published at the next consultation stage. The housing allocations at Wolvey are being reduced however.
Level of development is above projected population growth	96, 309, 318, 104, 84	Projected population growth for the UK over next 25 years is 15% so proposed development is unnecessary	1	The evidence underpinning the local housing need requirement is addressed in the evidence base.
Effect on Bulkington	84, 96, 309	Local shops there already do not have sufficient parking, increase of properties in Wolvey would add further strain.	1	The housing allocations at Wolvey have been substantially reduced.

Comment	Site referred to	Detail	Number of reps	Officer response
Risk of rat infestation	84, 96, 309	The agricultural land surrounding Wolvey has established rat colonies. If disturbed, the rats may infest the new houses or go elsewhere in the village. Also risk the outbreak of Weill's Disease.	1	This is not a material planning matter.
Fire risk	84, 96, 309	New houses will be full of lithium battery-powered gadgets which can explode and cause fires.	1	This is not a material planning matter.
Problems caused by increased dog ownership in village	84, 96, 309	Increased levels of barking and potential for more aggressive behaviour. Effect on the dogs themselves.	1	This is not a material planning matter.

Appendix 10 – Policy S7 Community Feedback – Preferred Option Employment Sites

Coton Park East – Site 64

Site name:	Coton Park
Number of representations referencing settlement:	140 individuals
Names of organisations referring to settlement:	Newton & Biggin Parish Council

Comment	Site referred to	Detail	Number of reps	Officer Response
Appropriate location and development proposal	64	Site should be prioritised to avoid green belt development	1	Noted.
Development should be concentrated at DIRFT	64	Proximity to DIRFT should be prioritised to enable use of rail transport and net zero	1	DIRFT is not within the borough
Increase in HGV and other traffic is a hazard	64	Major safety concerns about an increase in traffic, especially HGVs, close to a primary school and residential area. Safety and environment concerns from the Lorry Park. Newton Manor Lane is too narrow for the levels of traffic. Not at a green flagged junction.	34	See body of report
Loss of habitats from around a built-up area	64, 59, 87	Damage to wildlife ecosystems and biodiversity through continual loss of green spaces	23	See body of report

Comment	Site referred to	Detail	Number of reps	Officer Response
Poor quality of recent developments and underoccupancy	64	Persimmon have failed to finish the current site off properly including exposed barbed wire in green areas. Not all homes have sold suggesting lack of demand	1	This comment appears to refer to housing development. This site is now proposed for employment development.
Lack of employment need locally	64	Many employment sites in this area already and many employees travel in from closer to Birmingham. Previous Plan's examination report found there was 'little justification' for a larger employment land area on the site	8	See body of report
Previous residential allocation is more suitable than employment and avoids green belt development	64	Employment land is unsuitable use for this area which is very close to residential properties in Coton East and would significantly harm the rural character of the approach to Newton village through its visual dominance. At odds with RBC's stance that more housing is required. Increase in light and noise pollution.	60	See body of report
Proposals do not make provision for protecting and strengthening Green Infrastructure close to site	64	Concept plan from developers lacks sufficient landscaping and strengthening of green areas and rural surroundings	14	See body of report

Comment	Site referred to	Detail	Number of reps	Officer Response
Gypsy and Traveller site is inappropriate amid employment land / close to Newton residential area	64	The 8 pitch site is unsuitable due to being within an employment area and there is no historic affiliation to the area for the Traveller community. Impacts on wildlife. Respondents report safety concerns and disruption to existing community	102	See body of report
Negative impacts on nearby primary school	64	Increasing industrial units around Rugby Free Primary School poses health and safety concerns and worsens the setting of the school	13	See body of report
Increased flood risk in the area	64	Increase in impermeable surfaces will lead to increased runoff and cause flooding from the River Avon tributaries	6	See body of report
Support for expansion of primary school	64	Extension to Rugby Free Primary School is supported to meet local need	5	See body of report
Employment site should be moved north towards Magna Park	64	Site is not suitably located being near existing residential areas. It should be moved towards Magna Park along the A5 away from the town.	4	See body of report
Non-residential buildings should be in town centre not in residential areas	64	Non-residential sites in town would help regenerate the town centres	1	Noted, though the scale of employment need cannot be accommodated wholly in the town centre.

Comment	Site referred to	Detail	Number of reps	Officer Response
Worsening of air quality	64	Increase in industrial sites and associated HGV traffic will further worsen air quality, close to a primary school	1	Air quality is addressed in policy EN8.
Increase in car travel to primary school	64	Concerns over safety from increase in industrial sites around RFPS will lead to more parents taking children to school by car	1	This is a matter for detailed proposals to mitigate
"Mixture of unit sizes" is misleading	64	Very little floorspace given to small units - only 3.5% of the proposed total area	1	The mix of unit sizes is discussed in the body of report in response to a comment raised by the site promoter.
Loss residential character of the area	64	Erosion of residential character of Brownsover and Coton Park	3	See body of report
Lack of engagement with Rugby Free Primary School	64	The suggestion that land has been "safeguarded" for the expansion of Rugby Free Primary School is deeply misleading. The school has made it clear that it has not been consulted, and the Council recently refused permission for a nursery expansion, directly contradicting any suggestion of support for the school's future growth.	6	See body of report

Comment	Site referred to	Detail	Number of reps	Officer Response
Previous school proposal should not be replaced with Gypsy and Traveller accommodation	64	Respondents write that replacing this essential educational provision with a Gypsy and Traveller site not only disregards the long-term needs of local families but also places additional pressure on already oversubscribed schools across the borough	3	See body of report
Support for PRow being maintained	64	PRow should be maintained and remain integrated with public open space and routes to the school, away from industrial traffic	2	Noted.

South West Rugby – Site 17

Site name:	Site 17 Safeguarded Land at SW Rugby
Number of representations referencing settlement:	129 individuals
Names of organisations referring to settlement:	Thurlaston Parish Council, Dunchurch Parish Council

Comment	Site referred to	Detail	Number of reps	Officer response
Reallocation of portion of surplus employment land such as site 17/safeguarded land in SW Rugby could provide significant housing requirement	17	Respondent suggests potential for 953 homes on part of the safeguarded SW Rugby site - this would reduce other allocations elsewhere	77	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
24/7 light pollution is harmful to wildlife	17	Light pollution from warehouses will harm local wildlife, contrary to national policy (198c NPPF). Allocating the site for homes would reduce light pollution impacts as homes are not lit 24/7	68	See body of report
Site is adjacent to Cawston Spinney	17	Woodland lies 15m of the site boundary, below the Natural England recommended buffer of 50-100m for large scale industrial sites. Potential damage to flora and fauna including protected species bats, badgers and nesting owls	57	See body of report
Lack of transport access and road congestion	17, 77	Site is incompatible with Policies S1 and S7 as no evidence that impacts on traffic can be mitigated and no suitable public transport provision	48	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Land is not safeguarded for the development proposed	17	The land is safeguarded by the adopted local plan but the Inspector did not address the suitability of the safeguarded land for the development proposed, merely that “such a safeguarding provision would not alter the Plan’s ability to meet the identified housing and employment requirements to 2031, nor undermine the viability of the SWR site”	41	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Ambiguity of funding for a link road at Potsford Dam	17	The SA explains that “there is now a well established need to support this site in order to fund and ultimately deliver a new link road crucial to the new SW Rugby Strategic Urban Extension (SUE) Vision” (Box 5.1 on p.18). At paragraph 122 of his Report [6], the Inspector states: “I am satisfied, based on the appraisal evidence, that the development could viably deliver the full cost of the SWR spine road network”. Therefore, the SA is not entitled to say “there is a well-established need to support this site in order to fund and ultimately deliver a new link road crucial to the SW Rugby Strategic Urban Extension (SUE) vision”.	41	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Lack of consideration of other options	17	Lack of evidence that other sites such as 8, 70, 114 and 132 have been assessed fully as alternatives to site 17. All options contain site 17, perhaps due to the misconception that it is committed. There is also no reasoning given for allocating all of Coventry's unmet need	1	See body of report
Harm to the landscape	17	Existing warehouses already harming the landscape which will be exacerbated by further expansion	1	See body of report
Land should be safeguarded for sustainable agriculture	17	Growing climate emergency means food security is more pressing, and the land should be used for agriculture instead	1	See body of report
Safeguarded employment land (site 17) should be retained as natural habitat land	17	Land should contribute to biodiversity and mitigate habitat loss	7	See body of report
Operational hours of warehouses should be limited and mitigation strategies enforcement for light and noise	17	Operations for the two warehouses closest Cawston Spinney should be limited to daytime and 5 days a week to mitigate impacts on the woodlands and nearby residents	3	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Impacts on property located within Cawston Woods	17	Noise and light pollution and landscape impacts on nearby property	2	Impacts on nearby properties would be a matter for detailed consideration at planning application stage.
Increased risks of wildfires	17	Lack of provision for reducing risks of fire in the proposals. Climate change and the location of the warehouses and flammable materials poses significant hazard	1	We have seen no evidence to support this assertion.
Warehousing is better suited to Coton Park and Magna Park	17	SW Rugby is an unsuitable location for warehousing	1	Coton Park has an allocation proposed (site 64). We have considered sites near Magna Park, but these are not proposed for allocation - see Sustainability Appraisal for further information.
Developers should plant equivalent size of woodland elsewhere	17	Woodland the size of Cawston Spinney should be required elsewhere from the developers to mitigate the damage	1	Other policies within the plan would require canopy cover and biodiversity net gains.

Comment	Site referred to	Detail	Number of reps	Officer response
Safeguarded land should be used for smaller scale tech or service industry	17	Site would be better suited for SMEs providing skilled employment in technology or service industries	1	The allocation is to contribute to identified employment need - see Development Needs Topic Paper
Worst connections for freight transport of all employment sites allocated with no provision for transport impact mitigations	17	Not at a green flagged junction. Currently no proposed restriction on travel of HGVs through Dunchurch from the site as there is with Symmetry Park Phase 1	1	The Strategic Transport Assessment addresses transport impacts and proposes mitigation. In the case of South West Rugby specifically, a suite of transport infrastructure is already planned as part of existing allocations and policy, including the Potsford Dam link.

Comment	Site referred to	Detail	Number of reps	Officer response
Insufficient evidence of workforce available in surrounding area or requirement for further employment space of this nature	17	Currently over allocating 205,000 sqm for employment and this could be allocated on areas outside of safeguarded area	1	The allocation is to contribute to identified employment need - see Development Needs Topic Paper
Potential inclusion of a country park is insufficient as a buffer with Cawston Spinney	17	Calls for a larger country park area were not progressed and any proposals for smaller country park allocation are insufficient as a buffer with Cawston Spinney. This scale of area should not be referred to as country park as is too small	2	The site plan included in the annex identifies an increased area of greenspace which would create a buffer to Cawston Spinney.
Lack of consideration of other options	17	Lack of evidence that other sites such as 8, 70, 114 and 132 have been assessed fully as alternatives to site 17. All options contain site 17, perhaps due to the misconception that it is committed. There is also no reasoning given for allocating all of Coventry's unmet need	1	This site area was safeguarded for development in the adopted local plan.
Country park is not guaranteed due to be under differing ownership	17	Tritax are claimed to be offering a country park but do not own the land on which they propose to deliver it	1	Landowners are aware of the inclusion of the country park land.

Ansty – Sites 14 & 95

Settlement name:	Ansty
Number of representations referencing settlement:	4 individuals
Names of organisations referring to settlement:	Ansty Parish Council

Comment	Site referred to	Detail	Number of reps	Officer response
Retention as Green Belt land if current proposals fall through	95	Request that the site be retained as Green Belt if Fraser Group application does not proceed, rather than allocated for speculative applications	1	Through allocation of the site, the green belt boundary will be amended. This forms part of the supply of employment land.
Overallocation in one area	14	Further allocation for Fraser Group near Ansty will have detrimental effect on residents and village identity. Largest allocation for employment land in the Borough equal to 1/3 of total allocation space. Village is very small with no facilities locally	1	Allocations in this area near the edge of Coventry are not intended as allocations associated with the village, and facilities existing there are not part of the consideration.

Existing congestion will be exacerbated	95, 14	One way traffic flow bridge will not be able to support the large increase in traffic from employees travelling in by car. National Highways gave High concern level for Site 14	2	The Strategic Transport Assessment (STA) models impacts.
Mineral safeguarding area within the site	14	Warwickshire Minerals Local Plan allocated part of the site for sand and gravel safeguarding	1	No allocation is identified in the Minerals Local Plan. We are aware of a map indicating mineral safeguarding areas (here). The safeguarded area covers most of the borough and date of publication is unclear.
Support for site for manufacturing use	14	Suitable for manufacturing due to low Green Belt contribution and high GVA of manufacturing sector. Proposals must include landscaping along eastern edge to match or surpass that on Ansty Park south	1	Noted
Site should not be removed from Green Belt to prevent further phases of development	95	Concerns that the application may be a 'trojan horse' to release Green Belt land for further warehouse-centric development without additional facilities and community benefits	1	Planning approval has been granted on this site, and the allocation reflects this. Similar to other allocations, the green belt boundary will be amended.

Good public transport links needed	95, 14	Especially from Wolvey & Brinklow if housing plans for there go ahead	1	Noted. We are exploring potential connections with Coventry's VLR proposals in this area.
Mixed employment profile needed	95, 14	Not just warehouses as there are a lot of these in the district already. Should include high grade jobs, artisan working spaces & premises for small businesses.	1	Site 14 in particular is being allocated for none-warehouse uses. This is included in the development requirements.
Large employment site will have significant impacts on traffic flow in surrounding villages	95	Increase in flow and size of vehicles will have impacts on wider area including Brinklow	4	The Strategic Transport Assessment (STA) models impacts. In addition, traffic impacts associated with site 95 have been considered in determining to grant planning permission.
Damage to the heritage and identity of Ansty village	95	Major disruption to the local area and permanently damage village of Ansty	1	Site 95 already benefits from planning permission.
Lack of demonstrated need for site	95	No need for this site which will further harm town centres and high streets. No evidence of need for 7000 jobs locally	1	Employment need is addressed in the evidence base. This site already benefits from planning permission.

Ryton-upon-Dunsmore – Site 328

N.b. the summary below includes a small number of comments relating to the single proposed housing allocation at Ryton-on-Dunsmore (site 100). These are each addressed in the body of the report under policy S6.

Settlement name:	Ryton-on-Dunsmore
Number of representations referencing settlement:	81 individuals
Names of organisations referring to settlement:	Ryton-on-Dunsmore Parish Council, Bubbenhall Parish Council

Comment	Site referred to	Detail	Number of reps	Officer response
Multi-site approach preferable to concentrated large scale development	328	Single large site magnifies impacts such as traffic and preservation of rural character, while multisite approach can provide employment options across the borough and distribute the impacts of traffic etc. Site is away from most of Rugby's population	31	See body of consultation report

Comment	Site referred to	Detail	Number of reps	Officer response
Potential to worsen flood risk at Bubbenhall and damage green space	328	Large size of the area, much of which is a flood plain, will lead to runoff and fluvial flooding at Bubbenhall which is already an issue. Paths may also be flooded much of the year reducing benefits from the country park. Potential to lead to habitat loss and ecosystem impact at nearby Ryton Pools	11	See body of consultation report
Major increase in traffic causing congestion on key roads	328	Addition of up to 3000 employees plus HGVs and service vehicles on the A445 will create safety and congestion issues for all road users. Existing congestion on the Tollbar End roundabout from the Segro Park which is not yet at full capacity would also be exacerbated and the current infrastructure is unable to support the proposals. Significant worsening of air quality and increased pollution, noise and vibrations. Hazardous for pedestrians and children going to school	73	See body of consultation report

Comment	Site referred to	Detail	Number of reps	Officer response
Lack of public transport connections makes location poor	328	Site has poor public transport and below average levels of car ownership nearby reducing potential labour pool or those who would use the training hub. No bus was implemented for the existing site despite employees making dangerous crossings walking from bus stops in Coventry	42	See body of consultation report
Ecology assessment claims there is no additional recreational pressure on site which is misaligned with country park proposal	328	Question as to whether RBC disclosed the country park proposals to ecology consultants	1	This site will not be an allocation in the proposed Submission Plan.
Ryton already has good access to green open space	328	Provision of country park facility is of less value in this location and fails to offset harms. Lack of safe pedestrian access undermines value	8	See body of consultation report
Wildlife corridor to Ryton Woods SSSI should be considered	328	Reference NPPF 192 to include wildlife corridor between country park and Ryton Wood SSSI	1	Noted. No further action taken due to the allocation not being taken forward.
Ryton already has many Traveller sites	328	Additional Traveller site at 328 would be disproportionate and create further social cohesion issues at Ryton	68	This site will not be an allocation in the proposed Submission Plan.

Comment	Site referred to	Detail	Number of reps	Officer response
Damage to natural environment and local habitats	328	Impacts on protected species and local wildlife from loss of habitat and green space. Proximity to SSSI concerning - impacts from light pollution and noise	66	See body of report
Landscape impacts from 'Coventry Way' public footpath	328	Change of view and setting of the footpath with development	18	See body of report
Site is on Green Belt land	328	Inappropriate on Green Belt land All non-green belt options should be considered first	32	See body of report
Coalescence and loss of semi-rural setting	328	Increase in built up area around Ryton will create coalescence with Coventry and harm the village's semi-rural setting. Impacts on amenities, peace and privacy for residents with noise and light pollution from warehousing	45	See body of report
No consultation of residents	328	Residents only informed of the proposals via the Parish Council with no active consultation events from RBC or notifications	33	See body of report

Comment	Site referred to	Detail	Number of reps	Officer response
Scale of site is disproportionate	328	Scale of the proposed facility will dwarf the village and harm the village setting	6	See body of report
Houses prices will fall	328	Negative impacts on the area will cause house prices to drop due to becoming less desirable	8	See body of report
Too few amenities in the village	328	No GP surgery, pharmacy and very few shops. Primary school is already at capacity	6	This was a strategic employment allocation, which is not related to facilities in the village. It is no longer being taken forward however.
Encirclement on homes on Oxford Road by industrial sites	328	Respondents' homes would be encircled by industrial sites with noise and light pollution and loss of views. Loss of tranquillity for over 55s and retirement housing	10	This site is no longer proposed as an allocation.
Development requirements needed to mitigate impacts	328	HGVs must be prevented from travelling through the village to access A45. Country park must have pedestrian and cycle links from the start rather than the end of the project	2	Noted and agreed. However, for reasons set out elsewhere, it is proposed that this site will not be taken forward for allocation.

Comment	Site referred to	Detail	Number of reps	Officer response
Site was previously refused and has poor access	100	Impacts of traffic, difficulty exiting from either end of High Street and strains on amenities	2	This housing allocation is identified in the neighbourhood plan, and has been subject to a planning application.
Increase in number of cars has potential for road accidents	100	Many houses in Ryton have 3 cars meaning a potential increase of over 80 vehicles trying to exit the junction in the mornings, risk of an accident	1	As above, this site is identified in the neighbourhood plan, so the principle is established. A recent planning proposal included detailed highways consideration.
Overnight lorry park could increase crime	328	Lorry parks are associated with increase in crime causing concern to residents. No mitigation of risks mentioned	1	This would be a matter for consideration at planning application stage.
Vacancies at existing site suggests lack of need	328	Additional warehousing not demonstrated to be required as existing sites are underoccupied	1	Evidence of need is addressed in the strategy section of the Consultation Statement.

Comment	Site referred to	Detail	Number of reps	Officer response
Plan goes against Neighbourhood Plan	328	Proposal is at odds with Neighbourhood Plan which protects the village's rural character and neighbouring greenbelt	2	This is the nature of the interaction between local and neighbourhood plans. Neighbourhood plans must align with the strategic priorities of the local plan, and may need to be updated to reflect the latest version once adopted.
Existing developments have reduced mobile phone signal	328	Potential to exacerbate worsening of mobile phone signal in the village which is causing disruption to residents, those working from home and services such as the school	1	This site will not be an allocation in the proposed Submission Plan.
Request for more mid-range homes over affordable housing	100	Respondent supports additional housing but requests inclusion of mid-range priced homes rather than only affordable housing to maintain existing house values in the village	1	The requirement for affordable housing is set out in policy H2 and policy H1 sets out requirements for housing mix.
Lengthy period of disruption and poor air quality during construction	328	Increase in dust in the air from major construction works will lead to worsening air quality for residents. Request that this be monitored	1	Monitoring would be something to be considered at planning application stage.

Comment	Site referred to	Detail	Number of reps	Officer response
Water pressure will be made worse	328	Water pressure is already low and will be made worse by the development	1	The Water Cycle Study provides the evidence base. However, this site is not being included as an allocation in the proposed Submission Plan.
Jobs created at the site would not align with village population	328	Large proportion of the local population are older or retired and not seeking work, local housing costs exceed affordability on wages from most jobs created by the site	1	The site would contribute to the strategic employment needs identified in the evidence base. Its proximity to the adjacent Investment Zone and Coventry City are amongst the reasons it was identified at Preferred Option Stage.
Land is unsuitable due to previous quarry use	328	Land is was previously a sand quarry and is unsuitable for large-scale building due to subsidence	1	We acknowledge that an area is identified in the Minerals Plan. We will update the Stage 2 Site Assessment accordingly.

Appendix 11 – Policy W1 Comments regarding Brandon Stadium

Site name:	Brandon Stadium
Number of representations referencing settlement:	1552 responses
Names of organisations referring to settlement:	N/a

Comment	Keywords	Detail	Number of reps	Officer response
Fully support protection of Brandon Stadium	Brandon Stadium, support	Site is of cultural significance and local identity and will help increase employment and economic growth. Request that no non-recreational uses to be supported on the site. Potential for other sports and leisure facilities onsite	23	Noted.
Site will be too costly to redevelop after long period of dereliction	Brandon Stadium, objection	10 years of dereliction will make it unfeasible to redevelop to a fully functioning facility again	6	The Council is keen to support restoration.
Impact on noise and air pollution	Brandon Stadium, objection	At odds with policies on air quality and environmental protection	13	The policy seeks to restore the use of the stadium.

Comment	Keywords	Detail	Number of reps	Officer response
Disruption to local residents	Brandon Stadium, objection	Significant disruption for local residents from noise and traffic. Reduction in house values. Majority of those supporting do not live nearby	9	Responses in support of bring the stadium back into use have been submitted in volume, including submissions from outside the area. The policy supports motor sports together with other community uses.
Harmful to local wildlife	Brandon Stadium, objection	Protected species such as bats now live on the site, other species in the wider area would be impacted by development	2	Reuse or redevelopment of any kind would need to address policy requirements in respect of protected species.
Better used as a brownfield housing site	Brandon Stadium, objection	Site would be better suited for residential development as a brownfield site	8	A planning application for residential development has previously been considered and rejected. It was dismissed on appeal.
Introduction of a time limit recommended	Brandon Stadium, condition	May be sensible to add a timeframe to ensure project viability and implementation. Otherwise site may be best utilised for housing as a brownfield site	2	See comments above.
Other more pressing priorities	Brandon Stadium, objection	Other wellbeing priorities such as the library and museum are more important	1	The policy refers to other community uses.

Comment	Keywords	Detail	Number of reps	Officer response
Intervention needed to reduce traffic in the areas	Brandon Stadium, condition	Current traffic levels are not manageable through Brandon so site must not be used for housing	1	See above.
Council is biased in support for the stadium due to member's own interests	Brandon Stadium	Respondent feels that those in support of the stadium receive unfair preference due to bias at the council	1	The Council's position is in support, this is clear. We reject the suggestion that this is based on personal interests.

Appendix 12 – Community feedback regarding omission sites

Lodge Farm – Site 73

Site name:	Lodge Farm
Number of representations referencing settlement:	248 individuals plus sets of 2069 letters and 469 letters from local action groups
Names of organisations referring to settlement:	Action 4 Dunchurch, Stand Against Lodge Farm

Comment	Detail	Number of reps
National Gas main makes it unsafe	National Gas main goes to Church Lawford and through the site making it unsafe to develop	1
Lack of change in circumstances or mitigation proposals since 2019	Majority of the concerns raised by the inspector in 2019 remain or have not been sufficiently mitigated, namely transport, landscape impact, and cost of infrastructure	40

Comment	Detail	Number of reps
Significant impacts on traffic and road safety as well as increased air pollution	Projected additional 16-25,000 new vehicle movements a day will lead to congestion and increased road hazards at spots such as Onley village-A45 junction, the Longdown Lane-A45 junction, and the 426 and A4429 crossroads in Dunchurch, the latter of which is in a conservation area. A45-M45 junction is already classed as High Concern by National Highways. Increase in traffic on narrow local roads in Willoughby due to congestion on the A45 through the development	61
Irreversible environmental and landscape impact, exacerbated since 2019 by increased scale	Visual impact on the landscape including Barby Hill and Rainsbrook Escarpment as well as Leam & Rainsbrook Valleys. Onley village would be engulfed and character of the parish will be damaged. Potential ecological impacts on Leam Valley corridor and effects on Draycote Meadows SSSI. The development would also intrude on the Oxford Canal Conservation area. Impacts on nesting sites for farmland birds and local wildlife such as hares and bats	61
Lack of short-term deliverability and risk of overdependence	Site is unable to deliver houses in the short term, nor can it provide the 30% affordable housing requirement. Other villages may come under pressure to allow development to meet the shortfall before the site begins to provide housing.	9
Unsustainable, isolated location with lack of potential to promote active travel or reduce use of the private car	Site is inherently car dependent. Bus from Daventry to Rugby is not a guarantee and is likely to go via South West Rugby which would limit its appeal and ridership. Site would become a dormitory village as there are no jobs nearby	60
Increase in run off and surface water flood risk	Increase in impermeable surfaces will lead to greater run off and surface flood risk, surrounding areas are in a valley floor and primarily clay	8

Comment	Detail	Number of reps
Lack of need for such a large housing estate in Rugby	Rugby is a small town with few amenities and does not require such a significant population increase. Already many new houses being built	5
Lack of on-site infrastructure	Increasing strain on GP surgeries, schools, buses, train station and Coventry hospital, lack of on-site provision. Goes against infrastructure-led objectives. Much of the infrastructure would not be in place for a long time and could never be delivered	23
Goes against the dispersal strategy which would be preferable	Dispersal approach better meets the needs of Rugby Borough residents	4
Risk to affordable homes provision	High infrastructure costs of £33.5 million for the site will add significant burdens to developers putting affordable housing delivery at risk	21
Lack of guarantee for mitigation proposals	No confirmed or funded infrastructure plan including cycle paths, bus stops or junction upgrades	3
Impacts on nearby wildlife sites	Proximity to Draycote Meadows SSSI and contravenes adopted plan policy NE3 and National Policy to protect biodiversity	34
Impact on priority and protected species, fragmentation of ecological corridors	Records of high densities of farmland birds, protected mammals such as brown hares and bats, as well as GCNs and barn owls which require green corridors	40
Examples of similar sites being rejected in other parts of the country	Comparable site Lodge Hill in Kent was rejected on grounds of habitat and landscape impacts	20
Harm to heritage assets	Medieval ridge and furrow and remains of deserted medieval villages in this location. Proximity to Oxford Canal conservation area	4

Comment	Detail	Number of reps
Use of a greenfield site and farmland	Loss of agricultural land and contrary to objective 6	12
Reintroducing the site undermines consultation process	Site has not undergone the same processes as those included in the Preferred Option	18
No evidence proposed mitigations will work	No funded infrastructure plan and many past developments have failed to deliver what was originally promised	23
Expansion at HMP Onley will generate increased traffic	Increased traffic from staff and deliveries to the expanded prison at Onley may not have been factored into traffic considerations	1
Ground type presents challenges for development	Heavy clay with high shrinkability will need deeper and more expensive foundations. Larger distance between built structures and retained trees needed. Separate drainage and sewer systems for either side of the A45	2
One school to the north of the site is insufficient	Insufficient education provision on site makes the propose unfeasible	1
Sustainability Appraisal acknowledges significant constraints	Sustainability Appraisal (2025) scores the site negatively or uncertainly on many key criteria	1
Lack of primary care provision	Dunchurch GP surgery is already operating over capacity and would struggle to accommodate new patients, leaving Lodge Farm residents with no primary care provision if no surgery opens on site	31

Comment	Detail	Number of reps
Council should incentivise residents to move on from new settlements after their children have grown up by also providing developments for older people	Residents who don't move out mean that new families cannot access homes close to schools and facilities necessitating long car journeys as has happened with settlements built in the 1960s	1
Separation by at A45 is inappropriate for a settlement	Difficulty in crossing the through road and joining from the settlement	4
New school not needed in the south	School is more of a pressing need in the north of the borough	1
Coalescence of villages	Dunchurch, Onley, Willoughby, and Grandborough would lose their separation and identity	1
Link road needed to connect the site to the M45		1
Development of the site will not contribute to town centre	Does not support aims for regenerating the town centre	1
Building only on the Onley side is more suitable	Loss of productive farmland when building on Grandborough side, Onley side is more suited to development due to existing housing	1

Comment	Detail	Number of reps
Impact on Dunchurch Pools Marina employment and tourism asset	Significant risk posed to the marina which employs 20+ local people and brings visitors to the area. Acts as access hub for countryside and other recreational uses	131
Housing estate in the middle of countryside is not feasible	Particularly when near woodland and no infrastructure	2
Negative impact on the historic environment of the Upper Leam Valley	Development is at odds with the historic Feldon landscape of open aspects & small settlements, damages the setting of the nationally important R&F (Ridges & Furrows) landscape and works against the intentions of the Oxford Canal Conservation Area	12

Summary of hard copy letters submitted in relation to Lodge Farm

Letters were delivered as summarised below. A number of letter templates were submitted, which although broadly raising similar issues, differ slightly.

Summary of content	Number received - Stand against Lodge Farm	Number received - Action for Dunchurch
<ul style="list-style-type: none"> • Unsustainable car dependency - isolated location which offers no option for active travel or public transport use, going against national policy • Up to 25,000 extra vehicle movements a day - each household may generate 6-7 trips per day across commutes, school, errands and deliveries. Places burden on already congested parts of the road network including Dunchurch Crossroads and A45 and M45 junctions • 'High Concern' status from National Highways - impact on the SRN has already been flagged as high concern and the proposal would create increase in journey time and accident frequency • Effects on local services and roads - Reduced access to local services for existing residents due to longer journey times <p>No evidence mitigation will work - developer only makes vague references to improvements but these are not funded and previous promises have not been delivered</p>	621 letters	114 letters

Summary of content	Number received - Stand against Lodge Farm	Number received - Action for Dunchurch
<ul style="list-style-type: none"> • Isolated and unsustainable location - detached from existing towns and settlements with no active travel links requiring car dependency for all journeys • Delayed delivery and long-term infrastructure gaps - site will take minimum of 7-10 years to deliver infrastructure on site meaning residents will have to travel in the meantime. Precedent of delays at other large sites such as Houlton and SW Rugby • Affordable housing delivery at risk - site-specific infrastructure costs of £33.5 million adds c.£13,400 per dwelling on top of standard costs meaning developers are likely to be unable to deliver affordable housing originally promised. Houlton is an example of this • Cumulative strain on local services - increase in residents will overstretch healthcare, education and emergency services in the area • Lack of community consultation - adding this site after the preferred options consultation will undermine the role of community consultation 	596 letters	118 letters

Summary of content	Number received - Stand against Lodge Farm	Number received - Action for Dunchurch
<ul style="list-style-type: none"> • Surrounding Leam Valley has pattern of historic small-scale settlement development with medieval fields creating ridge and furrows. • English Heritage provided advice to ministers stating that the entire landscape of ridge and furrows around the village of Willoughby is of national importance • Scale of proposed development would intrude on the valley landscape and extend the urban edge from Dunchurch beyond the M45, damaging the setting of the nationally important ridge and furrow • Further impacts on the edge of the Rainsbrook Valley 	<p>165 letters plus one letter which also included a copy of the English Heritage report</p>	<p>102 letters</p>

Summary of content	Number received - Stand against Lodge Farm	Number received - Action for Dunchurch
<ul style="list-style-type: none"> • Leam Valley is a protected and sensitive landscape - surrounding landscape features ancient hedgerows, small-scale historic settlements and a high richness of species. Goes against national policy to preserve character and beauty of the countryside • Impacts on species and habitats - many priority species such as skylarks and yellowhammers would be affected alongside protected mammals such as hares and bats. Damage to green corridors would harm great crested newts • Fragmentation of ecological corridors - Leam Valley is a strategic ecological corridor which is key for pollinators, flood resilience, genetic exchange and migration in response to climate change. 2800 homes would block this corridor • Proximity to Draycote Meadows and sensitive sites - impacts on SSSI from noise, pollution, surface runoff and disruption to the corridor • Inspector has already noted the landscape impact - site was rejected at the 2019 Local Plan examination on the grounds that it would cause 'major adverse landscape effects' that cannot be mitigated • Other similar sites have been rejected - comparable sites such as Lodge Hill in Kent have been rejected due to harm to rare species and landscape. Precedent set from previous rejection of Lodge Farm 	605 letters	115 letters

Summary of content	Number received - Stand against Lodge Farm	Number received - Action for Dunchurch
<ul style="list-style-type: none"> • Projected additional 16-25,000 vehicle movements will worsen delays and congestion on surrounding roads • A45/M45 junction is already flagged as 'high concern' by National Highways • Development will break up the Leam Valley ecological corridor and harm wildlife including farmland birds, bats, hares and barn owls • Development poses threat to nearby Draycote Meadows SSSI • Planning Inspector rejected the site during the 2019 Local Plan Examination on account of its 'major adverse' landscape impact • Site does not meet RBC's requirement for sites to be deliverable in the short term and the cannot feasibly deliver 30% affordable housing 	82 letters	N/A

Summary of content	Number received - Stand against Lodge Farm	Number received - Action for Dunchurch
<ul style="list-style-type: none"> • Development would cause harm to Dunchurch Pools Marina, a nationally significant inland waterways facility • Urbanisation of the surrounding area would harm its setting and discourage future users who value the surrounding tranquil environment • Loss of valuable access to countryside for the local community through its 44 acres of parkland and access via public footpaths • Harm to ecosystems and local wildlife including key ecological sites such as Draycote Meadows SSSI and the Oxford Canal ecosite. Home to many rare and endangered species <p>Canals and associated tourism are a key part of the local economy which will be harmed by the proposals</p>	N/A	6 letters

Summary of content	Number received - Stand against Lodge Farm	Number received - Action for Dunchurch
<ul style="list-style-type: none"> • Oxford Canal area within West Northamptonshire is a designated conservation area. Proposals would have significant harmful impacts on this conservation area and would not complement the canal-based economy - acts against the Oxford Canal Conservation area • Although not currently designated, the setting of the canal through Willoughby parish is rural and passes through nationally important ridge and furrow landscapes <p>Development of Lodge Farm would damage the historic environment of the upper Leam Valley and runs counter to local and national policy</p>	N/A	6 letters

Summary of content	Number received - Stand against Lodge Farm	Number received - Action for Dunchurch
<ul style="list-style-type: none"> • Impacts from existing allocations in South West Rugby still not fully known and will create major upcoming pressures on the road network around Dunchurch which already experience significant strain • National Highways have classified the proposal as 'High Concern' due to impacts on the SRN • Site is in a rural location with no public transport links, necessitating car use and at odds with national and local policy. Potential to create up to 25,000 additional trips per day • No confirmed funding for transport infrastructure upgrades referenced by the developer • Dispersal strategy will better meet Rugby's needs • On-site infrastructure is likely to be delivered after the site has been fully built out with residents unable to access services in the meantime • Site-specific infrastructure costs total £33.5 million making affordable housing challenging • Increase in homes would place additional pressures on local services • Previous applications for other uses e.g. abattoir on the site have been refused on grounds of sustainability, and previous Plan examination had the residential proposal removed • Setting contains historic features such as medieval ridge and furrow and makes up part of the historic Leam Valley and Rainsbrook Valley area • Development would change the appearance of the Leam and Rainsbrook Valleys and is out of character with the small-scale settlements of the area • Proximity to the Oxford Canal Conservation Area would have serious impacts on its setting through open countryside • Area is home to priority and protected species such as hares, bats and owls - development would lead to major loss of habitats and disruption to ecosystems • Development would result in the urbanisation of approximately one quarter of the landscape, severing ecological and visual continuity. At odds with national policy • Parts of the site are prone to flooding due to valley location. Increase in impermeable surfaces will worsen the impacts and increase risk at other settlements • Proposal would lead to loss of arable farmland of grade 3 quality 	N/A	8 letters (2 respondents)

Summary of content	Number received - Stand against Lodge Farm	Number received - Action for Dunchurch
TOTAL	2069 letters	469 letters

Cosford - Site 114

All comments attributed to this site in the community feedback are included in the summary under 'Rugby sites' in appendix 9.

Clifton-upon-Dunsmore – Sites 83 and 238

All comments attributed to the above omission sites in community feedback are included in the Clifton-upon-Dunsmore summary in appendix 9.

Thurlaston employment sites – sites 18, 77, 133

Settlement name:	Thurlaston
Number of representations referencing settlement:	44 individuals
Names of organisations referring to settlement:	Thurlaston Parish Council

Comment	Site referred to	Detail	Number of reps
Harm to the landscape and rural setting	77	Further warehousing will erode the landscape and rural setting of Thurlaston village	41
Lack of transport access and increase in road congestion	77	Site is incompatible with Policies S1 and S7 as no evidence that impacts on traffic can be mitigated and no suitable public transport provision	40
Unreasonable to harm Thurlaston to meet Coventry's unmet need	77, 133, 18	Disproportionate impact on Thurlaston if these sites go ahead to meet Coventry's need	40
Green Belt location	77	Against national policy to use Green Belt location	41

Comment	Site referred to	Detail	Number of reps
Proximity to SSSI	77	Risk to ecosystems and local biodiversity sites	40
Access through Thurlaston and limited transport provision	133, 18	Access to the site would be too close to Thurlaston or partly through the village. The site has a very low transport score	1
Major impact on landscape and rural character	133, 18	Previous inspectors report stated Symmetry Park needed extensive mitigation of the visual impact on the landscape. Site 133 would have greater impacts as is closer to the village	40
Residents already have to drive through an industrial estate to access the village	133, 18, 77	Already too many warehouses close to Thurlaston which are hindering access and causing noise and light pollution	3
Objection to any further housing sites at Thurlaston	Unspecified	Respondent objects to even more housing sites given the 5000+ already proposed. This will overburden local facilities such as GP surgery and primary school	1