



CONSULTATION STATEMENT

ADDENDUM

APRIL 2026

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1. INTRODUCTION

- 1.1. This document is an addendum to the consultation statement dated December 2025 which details prior stages of consultation on the emerging local plan.
- 1.2. This consultation statement addendum provides details of the number of representations made pursuant to Regulation 20 of The Town and Country Planning (Local Planning) (England) Regulations and summarises the main issues raised in those representations. This addendum also provides the Council’s brief responses to those main issues.

2. THE REGULATION 19 CONSULTATION

- 2.1. The consultation on the Proposed Submission Local Plan 2025-2042 for Rugby Borough ran for six weeks from Friday 30 January 2026 to Friday 13 March 2026.
- 2.2. Copies of the Proposed Submission Local Plan, policies map, Sustainability appraisal report, Consultation statement and all other supporting documents were made available on the council’s website and in hard copy at the following locations:

Rugby Borough Council’s offices, Town Hall, Evreux Way, Rugby, CV21 2RR
 Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ
 Dunchurch Community Library, The Green, Dunchurch, Rugby, CV22 6PA
 Wolston Library & Information Centre, Manor Estate, Wolston, CV8 3GX
- 2.3. The consultation was publicised through the council’s social media accounts, through a notice published in the Rugby Observer newspaper on Friday 30 January. The promotional material for the consultation included a YouTube video which is 2:35 minutes in length and details the changes from the spring 2025 preferred options consultation document and outlines how interested persons can respond to the consultation. That video has had 847 views.
- 2.4. Emails were sent to 3,465 email addresses on the council’s planning policy consultation database, which included all those who had responded to the Regulation 18 preferred options consultation in spring 2025. Hard copy letters were sent to a further 28 postal addresses.
- 2.5. In persons residents’ information events were held at the following times and places during the consultation period:

Event	Date/time	Location	No. of attendees
Parish Councils information evening	Wednesday 4 February 2026 7pm	Rokeby Room, The Benn Hall, Newbold Rd, Rugby, CV21 2LN	32
Coton Park East and Newton	Thursday 5 February 2026 6pm	Rugby Free Primary School, 1 Bailey Rd, Rugby, CV23 0PD	28
Brinklow (2 sessions)	Friday 6 February 2026 7pm and 8:15pm	Brinklow Community Hall, Broad Street, Brinklow, CV23 0LS	66
Wolvey and Barnacle	Tuesday 10 February 2026 6pm	Wolvey Village Hall, The Square, Wolvey, LE10 3LJ	72
Clifton and Houlton (2	Thursday 12 February	Townsend Memorial Hall, 1	45

Event	Date/time	Location	No. of attendees
sessions)	2026 6pm and 7:15pm	Lilbourne Rd, Clifton upon Dunsmore, CV23 0BD	
Long Lawford	Tuesday 24 February 2026 6pm	Lawford Lighthouse, School St, Long Lawford, CV23 9AT	35
Wolston and Stretton	Wednesday 25 February 2026 6pm	Wolston Leisure and Community Centre, Old School Fields, Manor View, Manor Estate, Wolston, CV8 3PD	57
Rugby	Wednesday 4 March 2026 6pm	Rokeby Room, The Benn Hall, Newbold Rd, Rugby, CV21 2LN	36
Total			371

2.6. The residents' information events comprised a presentation by the Development Strategy Manager (planning policy manager) and Chief Planning Officer and then a Q&A session chaired by the cabinet member for planning or the leader of the council (this varied for different events).

2.7. Respondents were able to respond to the consultation by three different means:

- Hard copy by post or handed in. Hard copy forms were deposited in libraries and were made available at the information events listed above.
- By email.
- By completing a webform on the council's website

2.8. Respondents to the consultation were encouraged to use the Planning Inspectorate model response form, which we adapted for the Rugby Borough Proposed Submission Local Plan.

2.9. The statement of representations procedure is included as **Appendix 1**.

3. NUMBER OF RESPONSES TO THE CONSULTATION

3.1. 680 respondents submitted representations. Of these 46 were group representations submitted on behalf of a named list of respondents with names and addresses supplied. Therefore, representations in response to the consultation were submitted by or on behalf of 6,025 individuals and other entities.

3.2. Of the representations, 443 were received by email, 136 were received by webform, and 101 were received by post or were hand-delivered. *Note that some respondents submitted via multiple methods and have not been double counted in these totals.*

3.3. Core Document 9 provides a full alphabetical list of the representations received. Core Document 10 provides a list of the representations received by policy.

3.4. Of the representations received, 553 were made by residents or other individuals, 19 were made by parish councils, eight were made by statutory consultees, three were made by neighbouring authorities, 30 were made by other organisations, and 67 were made by landowners or site promoters.

4. MAIN ISSUES RAISED IN REPRESENTATIONS

4.1. The following sections summarise the main issues raised in representations made under Regulation 20 in response to each policy of the Proposed Submission Local Plan. The requirement of Regulation 22 is for the council to provide a **summary** of the **main issues**. Therefore this statement does not include every issue raised in every representation. Similarly, the issues are summarised rather than repeated verbatim from the representations in which they are raised.

4.2. In some instances a representor did not identify which policy their issue related to. In such instances the issue was attributed to the policy to which it is most relevant.

4.3. In line with Planning Inspectorate guidance, a brief council response to each main issue is provided.

OBJECTIVES AND PRIORITIES

4.4. 12 representations on behalf of 12 people or organisations argued that the plan’s objectives and priorities section is unsound. The following main issues were raised:

Issue	Objectives have not been followed in the rest of the plan e.g. third largest allocation is at the least sustainable settlement Wolvey contrary to objective 1, scale of allocations in rural areas requiring car travel contrary to objective 3, lack of new infrastructure being proposed is contrary to objective 5, loss of Green Belt and greenfield land contrary to objective 6
Who raised the issue	Warwick, Adrian; Wolvey Parish Council; Eaton, David
No. raising the issue	3
Council response	This is principally an objection to Policy S6 and specifically the residential site allocations in Wolvey and as such is dealt with in issues raised under that policy. The Council considers that there is no conflict between the proposed allocation of 210 new homes in Wolvey and objectives 1, 3 and 6.

Issue	Omission of a positive vision for the plan or direct reference to delivery of new homes (including affordable homes), as required by NPPF
Who raised the issue	Catesby Strategic Land; Catesby Estates; Vistry Group; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Richborough (Clifton upon Dunsmore); Warwickshire Property and Development Group (site 90)
No.	7

raising the issue	
Council response	<p>There is no inconsistency with national policy. Paragraph 15 NPPF sets that “plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings”. This paragraph is clearly referring to the plan as a whole, not a separate “vision statement” within the plan. Therefore, no additional vision needs adding.</p> <p>The objectives are for the council to determine subject to consistency with national policy. The objectives also draw more widely on the council’s Corporate Strategy 2025-2035, Economic Strategy 2025-2035 and Climate Change Strategy.</p> <p>It is not necessary of desirable to adopt objectives that simply repeat national policy requirements. This would conflict with NPPF para 16f) and would result in every local plan in the county having the same objectives. If government intended all plans to have uniform objectives which reiterate national policy, it would have said so.</p>

Issue	The third strategic priority on page 7 is inconsistent with national policy because it is ambiguous as to what it means
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	<p>This is a reference to the strategic priorities on page 7. The strategic priority objected to is “Overall pattern and scale of development and conservation”. As explained in the text on local plan page 7, NPPF paras 20-21 define that strategic policies are those which address strategic priorities. NPPF para 20 states that strategic priorities should set out (amongst other things) “an overall strategy for the pattern, scale and design quality of places” and “conservation and enhancement of the natural, built and historic environment”. The table on page 7 merely identifies which of the policies in the plan address these NPPF strategic priorities and are therefore “strategic”.</p> <p>Accordingly there is no ambiguity, the table merely tells us which strategic policies address the overall pattern and scale of place and which address conservation of the natural/built/historic environment.</p>

Issue	Section 1 does not reference population growth, current employment rates and predicted employment rates over the plan period.
Who raised the issue	SEGRO
No. raising the issue	1

Council response	<p>The respondent seeks inclusion of these details in this section to show how employment site allocations will support proposed job growth in the borough and how the employment sector can create more skilled jobs.</p> <p>The plan doesn't set a job creation target. This is because the requirement for employment land is in significant part regionally derived rather than being based on econometric projections for jobs growth in the borough.</p> <p>The context for employment growth is a functional economic market area and housing market area that covers Coventry and Warwickshire, not just Rugby Borough. The balance of jobs to homes in that wider area is set out in the Homes-Jobs Alignment paper (SD7).</p> <p>For these reasons it isn't considered possible or necessary to provide materials which tie the plan's employment allocations to a job creation target for Rugby Borough.</p>
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4.5. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Make explicit reference to objective of meeting housing and commercial needs of the borough and increasing housing supply as part of an objectives and vision statement	Catesby Strategic Land; Catesby Estates; Vistry Group; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Richborough (Clifton upon Dunsmore); Warwickshire Property and Development Group (site 90)
Third strategic priority on page 7 should be rewritten to make clear what the priority is.	Richborough (Clifton upon Dunsmore); Warwickshire Property and Development Group (site 90)
Add details to Section 1 of Rugby's population growth, current employment rates and predicted employment rates over the plan period	SEGRO
Table on p7 should list S3 not S2 under provision of employment land	Panattoni and AC Lloyd
Council response to modification proposals: The Council considers that the current objectives and strategic priorities are compliant with national policy and are sufficient to set out the aims and vision of the Local Plan. The typographical error in the table on p7 is noted and will be an additional modification.	

POLICY S1 SETTLEMENT HIERARCHY

4.6. 157 representations on behalf of 907 people or organisations argued that policy S1 is unsound. Seven representations on behalf of seven people or organisations argued that it is sound. The main issues for this policy are listed below.

Issue	Proposal for significant planned development at main rural settlements (1.17) is contrary
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	to national policy and is not justified by supporting evidence
Who raised the issue	Currington, Ian; James , Charles; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Court, Gerry & Carol; Spencer, June; Ling, Philip; Griffin, Colin; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Penman, Judith; Hilliard, Robert; Higginson, Helen; Gronow, Yvonne; Yates, Alan; Hawkins, John; Crosby, Ralph; Crosby, Sheila; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Black, John; Hawkins, Rachel; Bassett, Graham; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Gillman, Sarah Elizabeth; Lumsden, Peter; Parsons, Chris ; Persimmon Homes (Central); Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Long Lawford Residents ; Catesby Strategic Land; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; Gillman, Keith Neville; Reeve, Michael David; Lumsden, Jennifer; Wolston Parish Council
No. raising the issue	817 (including group responses)
Council response	<p>This is principally an objection to Policy S6 residential allocations and specifically the scale of residential allocations in villages, rather than to the settlement hierarchy itself. As such this issue is principally addressed under Policy S6.</p> <p>Notwithstanding that, the scale of housing allocations in main rural settlements, as explained in page 9 of the local plan, is not considered to be disproportionate to the position of these settlements as the second tier in the settlement hierarchy behind Rugby.</p> <p>1,653 new homes are allocated on sites in the borough’s rural settlements. However, the balance of housing planned in the period to 2042 is heavily weighted towards the town of Rugby. Excluding small site (<5 dwelling) windfalls, the location of which are unknown, 82% of the remaining 10,879 homes planned 2025-2042 would be at the town of Rugby versus 18% in the borough’s rural settlements. In 2021 26% of the borough’s population lived in rural areas versus 74% in the town of Rugby.</p> <p>The Green Belt Exceptional Circumstances Topic Paper (GBD4) and Sustainability Appraisal report (CD5) provide explanation of the consideration that has been given to further development options at the town of Rugby.</p> <p>Some objections state that the scale of development in main rural settlements conflicts with the statement in policy S1ii. that development at “main rural settlements should be in proportion to the settlement and would likely be small scale”. However, this statement is clearly referring to “further non-plan-led development” it does not apply to the allocations proposed under the plan.</p>
Issue	Insufficient consideration has been given to urban extension or non-greenbelt development nearer urban areas or other alternatives to growth in rural villages
Who raised	Currington, Ian; James, Charles; James, Catharine; Wolvey Parish Council; Ling, Philip; Mooney, Diane; Jackson, Geoff; Kimberley, Peter; Kimberley, Diane; White, Claire; White,

the issue	Garrie; Pitt, Michelle; Persimmon Homes (Central); Mistry, Bipin; Wolston Parish Council, CPRE
No. raising the issue	243 (including group responses)
Council response	As with the previous issue, this is principally an objection to Policy S6 rather than to the settlement hierarchy itself. The Green Belt Exceptional Circumstances Topic Paper (GBD4) and Sustainability Appraisal report (CD5) provide explanation of the consideration that has been given to further development options at the town of Rugby. More detail on the consideration of specific site options is set out in the Stage 2 Site Assessment Report (SS8).

Issue	Inclusion of Wolvey as a Main Rural Settlement is unsound - it is the smallest & least well served of the villages
Who raised the issue	James , Charles; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Court, Gerry & Carol; Spencer, June; Ling, Philip; Griffin, Colin; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crosby, Ralph; Crosby, Sheila; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Baker, Michael; Baker, Irene; Russell, Pauline; Hawkins, Rachel; Bassett, Graham; White, Claire; White, Garrie; Pitt, Michelle; Billington, Glynis; Chrimes, Brian; Trevelyan, Michael; Haughain, Mark; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Bates, David; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Gillman, Sarah Elizabeth; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Coope, Joanne; Miller, Stuart; Collins, Sarah; Collins, Michael; Billington, Richard; Gillman, Keith Neville; Reeve, Michael David; Reeve, Kathleen; Fisher, Hilary; Fisher, Michael; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Kelly, Patrick and Linda; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Hilliard, Sharon; Bates, Malcolm; Lovett, Lorna; King, Andrew; King, Alison; Briggs, Georgina; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Woolford, Wayne; Lee, Joanne; Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Alan; McCormack, Gemma; Myers, Alex; Price, Heather; Shaw, Wendy; Jones, Alan
No. raising the issue	130 (including group responses)
Council response	Wolvey was identified as a main rural settlement in the Rugby Borough Local Plan 2011-2031 (adopted June 2019) and before it in the Core Strategy (June 2011) and Rugby Borough Local Plan (July 2006). It is considered to remain appropriate for Wolvey to be identified in this settlement tier. More information is provided in the Rural Sustainability Study Report (SD14).

Issue	Inclusion of Brinklow as a Main Rural Settlement is unsound
Who raised the issue	Ashcroft, Sarah; Johnson, Linda and Gary
No. raising the issue	3
Council response	As with Wolvey, Brinklow was identified as a main rural settlement in the Rugby Borough Local Plan 2011-2031 (adopted June 2019) and before it in the Core Strategy (June 2011) and Rugby Borough Local Plan (July 2006). It is considered to remain appropriate for Brinklow to be identified in this settlement tier. More information is provided in the Rural Sustainability Study Report (SD14).

Issue	Inclusion of Wolston as a Main Rural Settlement is unsound
Who raised the issue	Wolston Parish Council
No. raising the issue	229
Council response	As with Wolvey and Brinklow, Wolston was identified as a main rural settlement in the Rugby Borough Local Plan 2011-2031 (adopted June 2019) and before it in the Core Strategy (June 2011) and Rugby Borough Local Plan (July 2006). It is considered to remain appropriate for Wolston to be identified in this settlement tier. More information is provided in the Rural Sustainability Study Report (SD14).

Issue	The restriction of non-plan led development at main rural settlements to being “small scale” is not justified. The plan should flexibly allow larger unplanned development at main rural settlements.
Who raised the issue	Archdiocese of Birmingham; Richborough (Clifton upon Dunsmore)
No. raising the issue	2
Council response	<p>Providing “flexibility” for major unplanned development in the borough’s rural areas would be contrary to NPPF para 15 which states that the planning system should be genuinely plan-led.</p> <p>It would also undermine/remove the ability of communities to meaningfully shape the future development in their areas through the democratic processes of local plan and neighbourhood plan making.</p>

Issue	S1 is unsound because it prevents modern technology and infrastructure such as data centres, which are essential to the modern economy, from being built outside of settlements.
Who	Everwell Development and Mactaggart Family & Partners

raised the issue	
No. raising the issue	1
Council response	This comment is more appropriately dealt with as an objection to policy S5 (countryside protection) and E2 (Employment Development) the issue of employment development in the countryside is dealt with under those policies. Data centres are for these purposes considered to be an employment use.

Issue	The statement regarding Crowner Fields Farm made in para 1.18 does not justify why that allocation is at odds with the settlement hierarchy.
Who raised the issue	Ansty Parish Council
No. raising the issue	1
Council response	The statement in the supporting text that employment allocations on the edge of Coventry, which is a large urban area but being in a different local authority district does not form part of the borough's settlement hierarchy, fall outside of the settlement hierarchy is not considered to conflict with the settlement hierarchy.

Issue	The plan fails to justify how higher house prices lead to more affordable housing And The plan offers no justification in response to the serious objection to the strategy documented in WCCs response to the previous consultation
Who raised the issue	Yates, Alan
No. raising the issue	1
Council response	Although not really comments on Policy S1, these comments are addressed here. This first comment is understood to be a reference to the position put forward in the Green Belt Exceptional Circumstances Topic Paper (GBD4) that the proposed Green Belt allocations would lead to higher affordable housing delivery. The basic principle is that higher house prices mean more development value and this in turn means more potential for developer contributions, including affordable housing. This is shown in the viability assessment (document I1). The second comment refers to the issues raised by Warwickshire County Council (WCC) in its response at Regulation 18 stage. An updated response has been submitted by WCC at Regulation 19 stage (see document CD10) and a statement of common ground

	prepared (SOCG7).
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4.7. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Settlement boundaries must be amended to include allocations, or the wording of S1A(ii) must be amended to clarify that plan-led development is	Inside Land Group
The policy should include a specific exception for essential modern technology, digital and data-processing infrastructure.	Everwell Development and Mactaggart Family & Partners
S1(ii) should be removed and all rural settlements listed in S1(ii) added to S1 (iii)	CPRE
Amend wording to ii to require further development to be in proportion to local infrastructure and change 'would likely be small scale' to 'should be small scale'	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
The second sentence of A. ii. should be amended to remove ‘and would likely be small scale’.	Richborough (Clifton upon Dunsmore)
Paragraph 1.17 should be amended to prioritise gradual small-scale and infill developments rather than larger scale developments	Parsons, Chris
<p>Council response to modification proposals: The council does not consider that these modifications are necessary to address issues of soundness. It is clear from the wording of Policy S1a.ii. that further non-plan-led development refers to development not allocated through the local plan or a neighbourhood plan.</p>	

POLICY S2 STRATEGY FOR HOMES

4.8. 115 representations on behalf of 1,163 people or organisations argued that policy S2 is unsound. Nine representations on behalf of nine people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	<p>Housing requirement should be increased above LHN based on:</p> <ul style="list-style-type: none"> - economic growth and/or demographic trends and/or - acute affordable housing need - and/or potential unmet need from Coventry - and/or updated standard method calculation before plan is adopted - and/or a past track record of housing delivery that is higher than LHN
Who raised the issue	<p>Ashberry Strategic Land; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Persimmon Homes (Central); Kang, Jane; Critchley, P; Miller Homes; William Davis Homes (site 315); Catesby Estates; Russell, Ridgley, Pugh and Pugh; Vistry Group; Vistry Group; Storm Consulting; Miller Homes (Brownsover Road); Rosconn Group; Richborough (Clifton upon Dunsmore); Rosconn Group; Mackenzie Miller Homes; Warwickshire Property and Development Group (site 90)</p>

	Note not every respondent listed above raised every one of the arguments for a higher housing requirement listed under this issue
No. raising the issue	28
Council response	<p>Section 2 of the Development Needs Topic Paper (SD11) considered most of these issues.</p> <p>The argument made by some respondents that the housing requirement should be increased because the trends-based 2022-based household projections indicate higher growth is effectively a variant on the argument that high past rates of delivery should be projected forward into a higher requirement. Both are arguments for past-trends-based projection of future housing needs. As stated in the Development Needs Topic Paper these arguments are no longer consistent with national policy. The topic paper states:</p> <p>“Had government intended that housing requirements should be based on past trends then it would have continued with a standard method for calculating local housing need which was based on trends-based household projections (as was the position pre 2024). Instead, the 2024 NPPF introduced a new standard method which isn’t trends based but is instead stock based. The new standard method applies a 0.8% annual increase in dwelling stock and then adjusts this upward depending upon the extent to which the ratio of median house prices to median earnings exceeds</p> <p>In short, it should not be assumed that areas experiencing fast growth will continue to maintain that rate of development in perpetuity. Equally it should not be assumed that lower growth areas will continue that trajectory. This is clearly not the intention of national policy and the new standard method.</p> <p>Therefore, historically very high rates of housebuilding in Rugby Borough do not present a convincing argument for setting a housing requirement above local housing need.”.</p> <p>In relation to local housing need needing to be updated, the Planning Practice Guidance (Paragraph: 008 Reference ID: 2a-008-20241212) states: “local housing need calculated using the standard method may be relied upon for plan making for a period of 2 years from the time that the plan is submitted to the Planning Inspectorate for examination”.</p> <p>Updated housing affordability ratios were published on 26 March 2026 showing a marginal improvement to the average median affordability ratio and a change to the standard method requirement from 636 to 635 homes per year. Updated dwelling stock estimate figures – the other data that feeds into the standard method and is updated annually – are not expected until May 2026. Therefore, local housing need will be fixed at 635 for two years from submission. It is not considered necessary to amend the requirement figure from 636 to 635.</p>
Issue	Past delivery of affordable housing has been low, and the proposed submission local plan cannot meet full need - this justifies setting the housing target higher
Who raised	Miller Homes; Vistry Group; Storm Consulting; Rosconn Group; Richborough (Clifton upon Dunsmore); Rosconn Group

the issue																																																													
No. raising the issue	6																																																												
Council response	<p>This is effectively a subset of the first main issue highlighted under this policy, but it is worth commenting on in a bit more detail.</p> <p>Identifying past affordable housing delivery rates is not straightforward because this data includes new build and acquisitions and includes s106 housing and housing funded through Homes England grant. This is not monitored directly by planning officers but is reliant on data collected by the council’s housing team from registered providers and data collected separately by Homes England. The data is also subject to frequent revision as information is updated/revised. This means that government published statistics do not accord with local Authority Monitoring Report data.</p> <p>Using the government statistics in Table 1011 (additional affordable housing supply, detailed breakdown by local authority) historic affordable housing delivery in the borough is recorded as follows:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>11-12</th> <th>12-13</th> <th>13-14</th> <th>14-15</th> <th>15-16</th> <th>16-17</th> <th>17-18</th> <th>18-19</th> <th>19-20</th> <th>20-21</th> <th>21-22</th> <th>22-23</th> <th>23-24</th> <th>24-25</th> </tr> </thead> <tbody> <tr> <td>New build</td> <td>192</td> <td>85</td> <td>42</td> <td>161</td> <td>22</td> <td>23</td> <td>42</td> <td>287</td> <td>377</td> <td>121</td> <td>185</td> <td>165</td> <td>101</td> <td>192</td> </tr> <tr> <td>Acquisitions</td> <td></td> <td>6</td> <td>2</td> <td>10</td> <td>5</td> <td>6</td> <td>6</td> <td>12</td> <td>45</td> <td>3</td> <td>4</td> <td>40</td> <td>33</td> <td>6</td> </tr> <tr> <td>Total</td> <td>192</td> <td>91</td> <td>44</td> <td>171</td> <td>27</td> <td>6</td> <td>23</td> <td>48</td> <td>299</td> <td>422</td> <td>124</td> <td>189</td> <td>205</td> <td>134</td> </tr> </tbody> </table> <p>This shows 1,975 additional affordable homes over the period compared to 1,844 reported in authority monitoring reports.</p> <p>Richborough (Clifton upon Dunsmore) have combined the additions data with published government data on social housing sales and demolitions. This data shows in Rugby Borough over the same 2011-2025 period 398 demolitions, 355 right to buy/right to acquire/other sales to sitting tenants, 149 low cost home ownership sales (this is typically where shared-ownership homes staircase to full ownership) and 46 other sales. This totals 948 losses over the 14 year period.</p> <p>In considering this net position, it is important to recognise that affordable housing is about tenure. Local authorities do not have the ability through the planning system to control the number of homes in specific tenures. This is because a significant proportion of the net change in stock in different affordable housing tenures reflects movement in the existing housing stock – for example dwellings being sold out of affordable housing tenures into other tenures or other dwellings being acquired and brought into affordable tenures. Similarly, the planning system can’t control the level of new build social housing that is grant funded by Homes England (i.e. is not s106) which depends on national government policy and individual RSL decisions. That leaves local planning authorities with a single tool – s106 affordable housing - and that tool can’t control net changes in stock in affordable housing tenures.</p>	Year	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24	24-25	New build	192	85	42	161	22	23	42	287	377	121	185	165	101	192	Acquisitions		6	2	10	5	6	6	12	45	3	4	40	33	6	Total	192	91	44	171	27	6	23	48	299	422	124	189	205	134
Year	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24	24-25																																															
New build	192	85	42	161	22	23	42	287	377	121	185	165	101	192																																															
Acquisitions		6	2	10	5	6	6	12	45	3	4	40	33	6																																															
Total	192	91	44	171	27	6	23	48	299	422	124	189	205	134																																															

This absence of control is why national policies and guidance do not require planning policies to set targets for net changes in the stock of affordable housing tenures.

Notwithstanding those limitations, it will be argued - by land promoters seeking to use social housing statistics to push up overall housing numbers to secure the allocation of omission sites – that the net affordable housing record is indicative of an acute Rugby Borough-specific problem with affordable housing delivery that calls for more housebuilding.

This argument is called into question by looking at the national and regional picture for changes in the dwelling stock in different tenures and then comparing this to Rugby Borough.

Government live table 104 shows net changes in dwelling stock by tenure in England 2011-2024. This shows a decline in the number of dwellings rented from local authorities in England of 151,814 over that period which is offset by an increase in 347,251 in the number of dwellings rented from registered providers, making a net increase of 195,437 in affordable rented tenures. Over the same period, the total dwelling stock in England is shown as growing by 2,641,347 dwellings. This means that 7% of the national increase in dwelling stock has been in affordable rented housing. The overall dwelling stock has grown by 11%, while the stock in affordable rented tenures has grown by 5%.

For the West Midlands region the picture shows more modest growth in affordable housing of 17,069 (2011-2024) a 3.8% increase, compared to 10.2% increase in all dwellings. With growth in affordable rented dwellings making up, similarly to the national picture, 7% of the net increase in dwelling stock.

Using government live table 100 we can see that for Rugby Borough 2011-2024 the total stock of affordable rented dwellings (combined local authority and registered provider) increased from 6,021 to 6,748, a 12% increase. Over the same period the total dwelling stock grew by 20.8%. 8% of the net increase in dwelling stock was in affordable rented tenures.

This shows Rugby Borough delivering 2011-2024 a net increase in dwelling stock of 21% compared to 11% for England and the 10% for the West Midlands and a net increase in affordable rented dwelling stock of 12% compared to 5% and 4% respectively. The proportion of the increase in dwelling stock that is in affordable rented tenures in Rugby was 8% compared to 7% regionally in nationally.

In other words, Rugby Borough's net affordable housing position is considerably better than the regional and national picture. That regional and national picture is principally influenced by national government decisions in terms of the affordable housing grant programme and policies like right to buy and right to acquire rather than by local authority planning decisions.

So the net stock position doesn't support Richborough or others' argument that there is an unusually bad affordable housing position in Rugby Borough. In fact, it suggests the opposite.

	<p>However, Rugby Borough has delivered over the past 14+ years the very high increase in overall all tenures dwelling stock that Richborough and others arguing for an increase in housing requirement call for, but this hasn't delivered a similarly big increase in affordable housing tenures. In other words the past record disproves their thesis that increasing overall housing numbers is the solution to affordable housing delivery challenges. Despite housebuilding that has been in the top 5% of local authorities in England over the last 20 years, Rugby Borough has seen a <i>decline</i> in the proportion of its dwelling stock that is in affordable tenures from 14% to 13%.</p>
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Issue	The windfall figure is too low compared to historic figures
Who raised the issue	Hillmorton Voice Residents Association; CPRE; Allanach, Richard
No. raising the issue	300 (including group responses)
Council response	<p>The windfall figure is justified in the Windfall Allowance Report (document SD13) and is discussed in the Development Needs Topic Paper (SD11). Windfalls are currently only claimed based on past delivery for sites of fewer than 5 units. A higher windfall allowance would need to expand to larger sites. Doing this would create a risk of double counting given that the plan makes allocations in the urban area. Additional analysis could consider if the windfall allowance could be expanded to units of 5-9 dwellings to reduce this double counting risk. This could add a modest number of homes. However, the council doesn't at this stage consider this to be necessary.</p>

Issue	The windfall figure is too high and/or double counts with other sources of supply
Who raised the issue	Tarrant, John; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Kang, Jane; Critchley, P; Russell, Ridgley, Pugh and Pugh; Richborough (Clifton upon Dunsmore); Mackenzie Miller Homes
No. raising the issue	11
Council response	<p>The windfall figure is justified in the Windfall Allowance Report (document SD13) and is discussed in the Development Needs Topic Paper (SD11).</p> <p>There is no double counting as windfall is only claimed for sites of fewer than 5 dwellings and these are not included in the supply. The windfall allowance has been accepted in a recent s78 appeal: APP/E3715/W/25/3373251 Land North of Rounds Gardens, Rugby, CV21 2BS although it was not specifically contested or commented upon in that decision.</p>

Issue	The whole plan buffer is too low given SUE delivery risks and market absorption constraints, or to provide a resilient 5yHls throughout the plan period
Who raised the issue	Ashberry Strategic Land; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Davidsons Homes; Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Kang, Jane; Critchley, P; William Davis Homes (site 315); Russell, Ridgley, Pugh and Pugh; West Midlands Housing Association Planning Consortium; Storm Consulting; Archdiocese of Birmingham; Wearing, Steve; Brandon Estates Ltd

No. raising the issue	22
Council response	The level of whole plan supply buffer is justified in the Development Needs Topic Paper (SD11) paragraphs 2.8-2.23.

Issue	Absence of evidence to demonstrate claimed delivery rates on South West Rugby and Houlton will be achieved
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	<p>Houlton is a development to the east of Rugby with permission for the delivery of 6,200 homes together with a district centre, local centres, open space, secondary school and primary schools. It also provides space for retail, financial services, restaurants, a hotel, community uses, assembly and leisure, as well as commercial and employment uses. Outline permission was granted in 2014 and updated through a s73 in 2017. Urban and Civic are the master developer of the site and have already provided all the significant infrastructure e.g. the main vehicle, walking and cycling route. This has created serviced plots for house builders to acquire and submit reserved matters applications on. The plan below shows the development which has taken place to date within different key phases as of June 2025.</p> <p>The first completions on Houlton were in 2017/18 therefore the site has delivered consistently for 8 years (2017-2025) with an average of 239 dwellings per annum being delivered. Over the new plan period average completions of 180dpa are assumed on this site. As explained in the Development Needs Topic Paper (SD11) a more modest target has been assumed compared to past delivery, in line with Lichfields' <i>Start to Finish</i> research, however this has potential to be exceeded.</p> <p>For South West Rugby, first completions on the site are expected in 2026-27. This therefore implies a build rate of 219dpa across the site over the plan period. This is relatively high, compared to national averages, but is realistic in a borough with a strong track record of delivering large urban extensions including Houlton as detailed above. As detailed in the Development Needs Topic Paper The absence of a master-developer at South West Rugby and greater fragmentation of land ownership is likely to give rise to more competition and more sales outlets on site, driving more rapid delivery.</p>

Issue	205 units from 'other allocations in the Local Plan' do not have planning permission despite being allocated in the adopted plan and therefore cannot be considered deliverable.
Who raised the issue	Vistry Group
No. raising	1

the issue	
Council response	The other allocations under local plan 2011-2031 are as below (this is an extract from Appendix 1 to the Development Needs Topic Paper (SD11)). As can be seen, of the 205 units, 165 are on sites within planning permission. The remaining 40 units are on sites that do not yet have planning permission, but which were under the Local Plan 2011-2031 subsumed into settlement boundaries and can effectively come forward as windfall. As these sites are not claimed to deliver dwellings in the next five years, the NPPF test is not that they are deliverable, but that they are developable i.e. a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged. The point envisaged is by 2042. This test is met for these sites.

Site	Status	Number of units	Completed to date	total from 2025-2042
Main rural settlement allocations				
Wolvey Campus, Wolvey (Countryside Properties)	Detailed R22/0113 - 90 Units	90	89	1
Land at Coventry Road, Wolvey (O'Flanagan Homes)	Detailed R22/0670 - 11 units	11	0	11
Land North of Coventry Road, Long Lawford (Bloor Homes)	Detailed- R17/1089- 149 Units	149	51	98
Land off Squires Road, Stretton on Dunsmore	Outline- R17/1767- 55 Units	55	0	55
Plott Lane, Stretton on Dunsmore	Revised application not yet received	25	0	25
Linden Tree Bungalow, Wolston	Application not yet received	15	0	15

Issue	Affordable housing need figure is incorrectly based on a plan period of 2025-2043 - the annual requirement for a 2025-2042 plan period should be 478 dpa not 474
Who raised the issue	Mr and Mrs Hudson; Kang, Jane; Critchley, P; Russell, Ridgley, Pugh and Pugh
No. raising the issue	8
Council response	This comment is a reference to the Updated Housing Needs Evidence (document SD3) rather than to the plan itself. Document SD3 models affordable housing need over a period to 2043. However, the figures for estimated need are presented in the evidence as annualised. Therefore the exact plan end date makes very little difference. For completeness document H3 provides an addendum to document SD3 in relation to affordable housing need over the 2025-42 plan period.

Issue	No reference to potential to accommodate Coventry's unmet need carried forward from the adopted local plan which runs to 2031
Who raised the issue	Rosconn Group; Warwickshire Property and Development Group (site 90)
No. raising the issue	2
Council response	RBC has considerably over-delivered against the housing requirement in the Local Plan 2011-2031 in the plan period to date. As detailed in the Authority Monitoring Report 2024-25 (CD19) 9,639 homes have been delivered against a requirement of 8,421 homes. Over-delivery of 1,218 homes.

	<p>The Local Plan 2011-2031 set its housing requirement to include 2,000 homes in unmet need from Coventry but didn't ring-fence or identify specific sites to meet this part of the requirement.</p> <p>The 2011 Local Plan requirement was based on the Coventry and Warwickshire Joint Strategic Housing Market Assessment 2015 (SHMA 2015). That evidence, which formed the basis for the unmet need, is more than 10 years old and is not based on the standard method for calculating housing need set out in current national policy and guidance.</p> <p>As both Coventry CC's and RBC's existing local plans are greater than 5 years post adoption, both of their SHMA 2015-derived housing requirements are deemed by national policy to be out-of-date. Similarly, plan-making in both authorities is required by national policy to be based on up-to-date evidence applying current national policy and guidance.</p> <p>Based on that up-to-date position there is no unmet need from Coventry as confirmed in the Memorandum of Understanding between Coventry and Warwickshire authorities (SOCG17) and the statement of common ground with Coventry City Council (SOCG2).</p> <p>Therefore, the fact that in 2015 there was unmet need is now immaterial.</p>
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Issue	Need for care accommodation is not included in standard method - housing need should be uplifted to included assessed need for care units
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	<p>The standard method is based on two components, table 125 dwelling stock (including variants) and median workplace-based affordable ratios (for dwellings). Both inputs use "dwellings". Neither of these inputs defines what it means by "dwellings". For this, we need to look at Census 2021 information.</p> <p>The census definitions are here. A dwelling "is a unit of accommodation that may comprise one or more households. If it contains more than one household, then it is a shared dwelling. Most dwellings contain only one household.". A household is "one person living alone or a group of people, not necessarily related, living at the same address who share cooking facilities and share a living room or sitting room or dining area". In the census those not living in dwellings are generally living in communal establishment accommodation. A communal establishment is "An establishment providing managed residential accommodation. "Managed" in this context means providing full- or part-time supervision of the accommodation. Communal establishments exclude all sheltered accommodation, serviced apartments, houses rented to students by private landlords, and nurses' accommodation. These are defined as households.".</p> <p>Communal establishments do specifically include "medical or care establishments".</p> <p>Therefore, the dwelling-based components of the standard method do not include C2</p>

	<p>care homes. However, they would include other types of accommodation in the older persons' sector in which care is often provided, for example extra-care housing.</p> <p>So, to the extent that Vistry are arguing that housing (i.e. dwelling) need needs increasing to accommodate additional housing with support, this position is incorrect. As dwellings, this type of housing is already baked into the standard method which provides an undifferentiated housing need that is not broken down by type and tenure.</p> <p>The position is different for C2 residential care/nursing care bedspaces. These are not baked-in to the standard method but sit outside it. However, the Planning Practice Guidance (Paragraph: 026 Reference ID: 68-035-20190722) that these bedspaces can be counted as part of housing supply, stating: "Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market."</p> <p>The Updated Housing Needs Evidence (SD3) provides at Table 7.8 estimates for the need for specialist older persons' accommodation. This includes a need for 326 bedspaces in residential care and nursing homes by 2043. Using the housing delivery rulebook method, this would equate to 136 dwellings. Should the plan requirement for general housing be increased by this amount to try to deliver care homes? Our view is no. This would be an extremely blunt an ineffective method of delivering care homes because new allocations would be more likely to be taken up by general market housebuilders unless specific allocations for care homes could be made. But with no potentially suitable sites being promoted for the development of care homes, that is not likely to be an effective option. Therefore, simply levering up the overall housing requirement would not be an effective way to deliver care homes.</p>
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Issue	Plan period is too short to comfortably cover the 15-year requirement
Who raised the issue	Ashberry Strategic Land; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Persimmon Homes (Central); Catesby Strategic Land; Kang, Jane; Critchley, P; Miller Homes; Catesby Estates; Russell, Ridgley, Pugh and Pugh; Storm Consulting; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Latimer Developments Ltd; Richborough (Clifton upon Dunsmore); Rosconn Group; Mackenzie Miller Homes; Warwickshire Property and Development Group (site 90)
No. raising the issue	27
Council response	<p>The council aims to submit the plan for examination in late April 2026. If the plan proceeds through examination efficiently it can be adopted by the council before 1 April 2027 giving 15 years to run on adoption.</p> <p>If examination is more protracted and the plan cannot be adopted until (say) 1 May 2027, the plan would still have 14 years and 11 months to run from adoption. The additional 1 month of housing supply in 2042 that the plan would be missing from the 15 years would make little real-world difference because (1) all allocations in the plan are likely to be built out before 2042 anyway, (2) with rolling 5-year plan reviews a plan adopted in 2027</p>

	<p>would have been reviewed 2-3 times before 2042 is reached.</p> <p>Conversely, there are clear reasons why now is not the right time to plan to 2045 or beyond as is suggested by some representors:</p> <ul style="list-style-type: none"> - This plan is being prepared under a soon-to-be-superseded 2024 NPPF and under temporarily saved provisions of the Planning and Compulsory Purchase Act 2004. In other words, under the legacy system. A plan looking ahead to the mid-2040s or beyond would be better prepared under new national policy and the new plan-making system. - In July 2026 announcements are expected on both the geography of a new strategic authority for Warwickshire and a new unitary authority covering the area of Rugby Borough. Rugby Borough Council will cease to exist on the reorganisation date of 1 April 2028. Very long-term planning would be better done by the new strategic authority through its Strategic Development Strategy and by the new unitary authority through its new-style local plan. This will enable all the benefits that have led to a reintroduction of strategic planning to be realised in terms of looking at a broader area and coordinating with long-term infrastructure investment. Similarly, the new unitary authority that would be tasked with implementing the plan in the 2040s would be better placed to make the plan. Together, this would result in a more coordinated approach.
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4.9. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Policy S2 should specify that the housing requirement figure is a minimum, in line with NPPF para 62.	Inside Land Group; Catesby Strategic Land; Catesby Estates
Plan period should be extended to meet the 15-year requirement (most suggest to 2043 or 2045)	Ashberry Strategic Land; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Miller Homes; Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Catesby Strategic Land; Critchley, P; Vistry Group; Storm Consulting; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Latimer Developments Ltd; Rosconn Group; Warwickshire Property and Development Group (site 90); Brandon Estates Ltd
Buffer should be increased to at least 10% or 15-20% to reflect SUE delivery risks, market absorption constraints, and/or affordable housing needs	Ashberry Strategic Land; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Critchley, P; Russell, Ridgley, Pugh and Pugh; Storm Consulting; Archdiocese of Birmingham; Latimer Developments Ltd; Rosconn Group; Warwickshire Property and Development

	Group (site 90); Brandon Estates Ltd
Windfall provision should be reduced to accord with proportionate evidence.	Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Critchley, P; Russell, Ridgley, Pugh and Pugh
Ensure 205 affordable homes delivered per annum in order to meet 170 affordable homes shortfall in figures	Bilton Grange School; Mr and Mrs Hudson; Critchley, P
Increase housing requirement (and allocate further sites) suggested to 721pa (Richborough, Warwickshire Property and Development Group)	
Additional strategic policy should be added to ensure suitable homes are allocated within Neighbourhood Plans	Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Critchley, P; Russell, Ridgley, Pugh and Pugh
Remove previously allocated sites which have not come forward from the trajectory and total figure	Vistry Group
All sites over a certain size should offer plots for self-build or independent builders. The number of plots allocated for self-build/independent building must be stated in the plan and enforced.	O'Connell, Mark
Increase the windfall supply by 400 units to account for likelihood that windfall developments of 5 dwellings and over come forward (as has consistently occurred in recent years).	Allanach, Richard
Council response to modification proposals: Proposed modifications relating the plan period and housing requirement, buffers and windfall allowances have been addressed in the S2 main issues section of this statement. The Council considers its current strategy for homes is reasonable and justified.	

POLICY S3 STRATEGY FOR EMPLOYMENT LAND

4.10. 27 representations on behalf of 329 people or organisations argued that policy S3 is unsound.

Three representations on behalf of three people or organisations argued that the policy is sound.

The main issues for this policy are listed below.

Issue	West Midlands-wide study area fails to accurately consider the large-scale logistics development around Rugby, meaning the requirement exceeds genuine local need
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298 (including group responses)

Council response	<p>It is correct that the scale of large-scale logistics development around Rugby has been high. Appendix 2 of the Development Needs Topic Paper (SD11) records 314,838m² (3,338,888ft²) of B8 floorspace completed in the borough in just the last 5 years. We are also aware that this excludes large logistics developments close to the town of Rugby but outside of the borough boundaries at DIRFT and Magna Park.</p> <p>We are aware of resident concern about this scale of development of this development. Back at issues an options stage 36 responses including several parish councils expressed concern about this and this was also reflected at issues and options stage.</p> <p>It is also correct that the requirement for employment land incorporates a contribution to sub-regional rather than genuinely local need. However, this is in accordance with the duty to cooperate on strategic cross-boundary issues.</p>
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Issue	Emphasis on B8 logistics uses does not provide high quality employment for residents and is at risk from trend of automation.
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298 (including group responses)
Council response	<p>We agree that this is a risk for the borough and this was highlighted back at issues and options stage. This is why the first objective of the plan is to support the diversification of the borough's economy. This in turn is informed by the Rugby Borough Economic Strategy 2025-2035 (document SD17) which sets as a long-term goal "diversifying inward investment to ensure our ideal location for logistics and transport does not create an over-reliance on this sector."</p> <p>The plan seeks to deliver that diversity in the following ways:</p> <p>Requirements on the allocations at Coton Park East and Walsgrave Hill to deliver smaller units</p> <p>Ring-fencing the proposed Ansty Park north expansion for B2, light industrial and R&D uses</p> <p>Developing on the existing cluster of non-B8 uses at the edge of Coventry where the evidence suggested greatest opportunity for diversification exists. This is explained more in the Green Belt Exceptional Circumstances Topic Paper (GBD4).</p>

Issue	Policy S3 underestimates future employment land need because it fails to take account of recent trends or is out of date or otherwise underestimates need
Who raised the issue	Windsor Developments Limited; S&D Postlethwaite; BARJANE; Stoford Properties Ltd; Windsor Developments (Site 145); Warwickshire Property and Development Group (site 18); Warwickshire Property and Development Group (Site 20)
No.	8

raising the issue	
Council response	<p>There are three separate points here, not all of which were raised by every respondent listed. However, they are grouped together as they are interrelated points.</p> <p>In relation to recent trends, this point was responded to in Appendix A1 of the HEDNA – WMSESS Alignment Paper Addendum (SD6). Nurton, for example, argue for the use of a three-year trend. The use of a short-term trend would not be justified because it would not adequately capture the full economic and property market cycle. Additionally, in recent years, demand for strategic units has been driven by a number of exceptional, one-off factors, which are unlikely to persist in the longer term forecast period to 2045 and beyond. Factors such as Brexit, port disruptions such as the Suez Canal and the pandemic have driven stock holding requirements to secure UK supply chains. These drivers created a temporary uplift in demand that does not represent a longer-term trend.</p> <p>A similar criticism is made by Stford citing past trends in the borough. The evidence base is regional/subregional. The WMSESS sets out a regional requirement and apportions taking account of areas that have historically been constrained, rather than simply rolling forward past trends. As explained in the alignment paper addendum, it is inappropriate to focus narrowly on individual districts and assume that the pattern of past supply is replicated.</p> <p>The evidence is adequately up to date. The WMSESS was published in August 2024 and updated local needs evidence was prepared through the alignment paper in November 2024 and then again corrections were made in the alignment paper addendum in November 2025. The WMSESS is a complex piece of work undertaken on behalf of and with input from 25 local authorities and the West Midlands Combined Authority. The WMSESS used data up to April 2022, the latest data available at the time. Without a full update for the whole of the region, up to date data cannot be used to update the modelling. It is therefore suitable for RBC to net off any completions from April 2022 onwards, as the Council have done in the Development Needs Topic Paper. It is totally unrealistic to continuously update the WMSESS study on a rolling basis, the study is adequately up to date.</p> <p>Some of the specific critiques of the evidence on need are picked up as separate issues in this consultation statement addendum. As a general point, however, no projection of future need for employment need is <i>correct</i>. Projections are decision-aiding tools that try to anticipate what will happen in future. The requirement in national policy is to demonstrate proportionate evidence and an objective assessment of needs.</p> <p>The council has done that. It has recognised the larger-than-local nature of employment need and the limitations of pure trends-based planning. On that basis it has joined with authorities across the West Midlands to produce regional evidence which employs a replacement demand and freight volumes based model to derive non-trends-based regional need for larger sites. It has then combined this with trends-based ‘local need’ for smaller sites through an alignment paper which was then updated.</p> <p>The council is planning to meet the evidence identified in this evidence in full.</p>

Issue	Plan period is not sound as not positively prepared, consistent with NPPF or justified
Who raised the issue	Prologis UK Limited; Mountpark Logistics EU Sarl; Stoford Properties Ltd; Mitchell, Stuart
No. raising the issue	4
Council response	The same issue was raised by residential omission site promoters and is discussed above. The response is substantively the same here. The plan-period is not an issue of whether the plan is positively prepared or justified. It is purely an issue of consistency with the NPPF.

Issue	Inadequate contribution to Coventry unmet need and/or Coventry unmet need is higher than Coventry City Council assert
Who raised the issue	Tarmac Trading Ltd; BARJANE; Stoford Properties Ltd; Swanvale Developments Ltd; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes; Tritax Big Box Developments Ltd (Site 17); Prologis UK Limited
No. raising the issue	10
Council response	The calculation of Coventry unmet need is a matter for the examination of Coventry's plan which is ongoing. RBC needs to respond to the information provided by Coventry as to the extent of that unmet need. The plan can contribute to meeting Coventry's unmet need. It does that alongside delivering a step change in the level of large-site strategic development compared to the 2011-2031 Local Plan from an already high base. RBC is only one of Coventry's neighbouring authorities and North Warwickshire, Nuneaton and Bedworth, Warwick and/or Stratford districts may also be able to contribute. Ultimately, unmet need is for supply towards the back end of Coventry's plan period in the late 2030s/early 2040s. If this cannot be met through the current round of plan-making, then an SDS is being produced for the West Midlands Combined Authority and will be produced for Warwickshire. This would be an appropriate mechanism for dealing with any remaining shortfall.

Issue	Failure to accommodate unmet need from Harborough District Council of 146,000sqm
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising the issue	4
Council response	The council's evidence base is that Harborough District is in a different functional economic market area to Rugby Borough and therefore it is questionable whether it would

	<p>be appropriate to shift employment need between the two authorities. In any event Harborough is not reporting unmet employment need as confirmed in the statement of common ground (document SOCG3).</p> <p>If there is unmet need from Harborough this would be addressed in the Leicester and Leicestershire housing market area and functional economic market area.</p>
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Issue	The HEDNA-WMSESS Alignment Paper Addendum (SD6) identified an error in the WMSESS which had counted the country park at Coventry Gateway South in Warwick District as developable area. This resulted in a reduction of 90ha in the supply calculated in the WMSESS. The Alignment Paper Addendum recommended that 50ha of this supply should be made up in opportunity area 7 in which Rugby Borough lies with the rest to be made up elsewhere in the West Midlands. Respondents argued it should all be made up in Rugby Borough. Some of the responses claim other errors in calculating supply.
Who raised the issue	Manse Opus and Rolls Royce Plc; Prologis UK Limited; Mountpark Logistics EU Sarl; BARJANE; Stoford Properties Ltd; Ashfield Land; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes; Warwickshire Property and Development Group (site 18); Warwickshire Property and Development Group (Site 20); Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	13
Council response	<p>The alignment paper addendum identified a need for up to 2 additional 50 ha sites across region to meet the highest end of the need range (Para 2.9) and stated it would be appropriate for at least one to be apportioned to Area 7 (Coventry/Rugby).</p> <p>A further 50ha site to meet the highest end of the range could be considered within elsewhere in Coventry and Warwickshire or equally in another part of the region. 50ha equates to 1.5% of the need show at the higher end of the gross need and this is well within the margins of long-term forecasting.</p> <p>The council does not consider that there are other supply errors in Rugby Borough.</p> <p>One response argued that the Coventry airfield Gigafactory site shouldn't be counted as supply because it is reserved for battery manufacturing. We disagree; this is still a B2 use on a strategic scale site.</p>

Issue	Not enough land is allocated; there should be a non-implementation buffer
Who raised the issue	Barberry Ansty Limited; Mountpark Logistics EU Sarl; Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	3
Council response	The question of buffers for employment land was considered in the Development Needs Topic Paper (SD11) under the heading "Should an employment land headroom/buffer be identified". The council's position is set out there. In short, the evidence base already

	builds in supply buffers.
Issue	Plot ratios used in evidence are too high. Plot ratios are below 0.35
Who raised the issue	Windsor Developments Limited
No. raising the issue	1
Council response	This point was considered in section 4 of the HEDNA-WMSESS Alignment Paper Addendum (SD6) wherein it is concluded that the plot ratios are justified.
Issue	A single office allocation does not meet identified need (S&D Postlethwaite) S3 does not positively plan for digital-intensive employment, contrary to NPPF expectations (Everwell).
Who raised the issue	S&D Postlethwaite; Everwell Development and Mactaggart Family & Partners
No. raising the issue	2
Council response	These are two separate issues but are addressed together for convenience. As set out in the Development Needs Topic Paper, the level of office floorspace planned for is justified by the evidence base. In relation to digital-intensive employment, this is understood to be a particular sector. The local plan is a land use plan; it plans for land uses generally (in the case of employment land) by reference to use classes in the 1987 Town and Country Planning (Use Classes) Order (as amended). It is not possible to plan for particular occupiers or categories of occupiers because local planning authorities do not exercise control over who occupies buildings.
Issue	S3 is unsound because it fails to address the identified need for smaller employment units within the Borough
Who raised the issue	Mr N Williams and Miss E Williams the landowners of Land at Mill House, Dunchurch; Ansty Parish Council; Richborough Commercial (M45 J1); Mitchell, Stuart
No. raising the issue	5
Council response	Although the evidence base combines a need for strategic sites and a 'local' need for smaller units, a single industrial land requirement is set. Large units are built on small sites and vice versa. Setting different requirements for smaller and larger buildings would create a planning policy that would be impossible to implement and monitor, given that local plans and DM decisions seldom determine the specific size of units that can be built on sites, which is generally market-led.

	There is, however, clearly a quantitative and qualitative identified demand for smaller units. In response to this, the plan specifically requires smaller units to be delivered on the sites at Coton Park East and Walsgrave Hill.
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Issue	Brownfield recycling assumption in the WMSESS is too high
Who raised the issue	Prologis
No. raising the issue	1
Council response	<p>‘Replacement’ of older stock is a significant driver of demand – in the MDST model (used in the WMSESS), it drives 88% of the road-based need (WMSESS Para 10.34). Lichfields for Prologis misinterpret the WMSESS – they suggest the WMSESS is assuming 50% of need will be met brownfield recycling. This is wrong – the position is 25%. The MDST model has a recycling adjustment of 860ha (equivalent to 25% of need). This consists of 20% of total need (626ha) and a further 30% of pre-2015 stock on strategic sites (234ha). The 20% of total need component is based on all strategic units, not just strategic sites and is hence much higher. The 30% component is based on strategic sites. The gross completions model used in the WMSESS also has a recycling adjustment of 390ha = 50% of pre-2015 strategic site stock (equivalent to 13% of total need). As the MDST model is primarily driven by its replacement demand component, it was considered more suitable to apply a greater brownfield recycling component. It is realistic to assume that replacement of obsolete buildings occurs onsite, particularly on existing strategic scale sites, rather than on new green field land.</p>

Issue	Labour Demand and VOA models (used in the HEDNA 2022) should have been used in the Alignment paper
Who raised the issue	Prologis
No. raising the issue	1
Council response	<p>The labour demand and VOA models don’t allow any split between smaller and big box needs and therefore do not allow alignment between local need and the WMSESS strategic need to be considered. Furthermore, neither model captures the effects of replacement demand.</p> <p>In Tables 9.14 / 9.15 in the HEDNA these models were showing a significantly lower scale of need.</p>

Issue	The need being planned for now is lower than was shown in the HEDNA 2022 (particularly for local need)
Who raised	Prologis, Nurton, Stoford, Tritax Big Box

the issue	
No. raising the issue	1
Council response	<p>Analysis within the alignment paper shows that the local + strategic requirements do not hugely deviate from the 2022 HEDNA, the distribution between local and strategic needs is just more skewed to strategic sites.</p> <p>Para 3.22 of Alignment Paper 2024 states that the HEDNA 2022 set out total need of 1,173ha for Coventry and Warwickshire over the 2021-50 period.</p> <p>The Alignment Paper Addendum 2025 indicates C&W requirement of 1,466 to 1,648ha for 2021-50 period.</p> <p>Therefore, total employment land need is higher than was shown in the HEDNA 2022.</p>

Issue	The maths is wrong in Nov25 Alignment Paper Table 1.4
Who raised the issue	Prologis
No. raising the issue	1
Council response	Differences are marginal – 1-2 ha over 20-30yrs.

Issue	<p>Adjusting in the WMSESS for large units on small sites perpetuates a sub-optimal situation in under-providing strategic sites.</p> <p>The WMSSESS reduces the strategic site need by 25% (net) to reflect the fact that some large units will be built on smaller sites. However, the uplift to Coventry and Warwickshire local need to reflect strategic units on non-strategic sites is only 10-13%. There should be a greater uplift to C&W local need.</p>
Who raised the issue	Prologis
No. raising the issue	1
Council response	<p>This issue within Coventry and Warwickshire is addressed through the Alignment Paper which brings together strategic and non-strategic sites need. RBC has taken this into account in setting out employment land requirements in the plan. Allocations in the plan include new strategic sites and expansions to existing strategic scale sites.</p> <p>Paragraph A1.15 of the Alignment Paper Addendum (SD6) responded to this issue.</p> <p>The proportion of strategic units on smaller sites is lower in Coventry and Warwickshire than in other parts of the region.</p>

Issue	Savills demand estimates (submitted by the representor) show a higher need
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Who raised the issue	Tritax Big Box
No. raising the issue	1
Council response	<p>Savills use a suppressed demand model (at 8%) to forecast a 17-year need of 961ha for Coventry & Warwickshire = 56.5ha per annum Comparing this to Alignment Paper 2025 – total C&W need of 1,466 – 1,648ha for 2021-50 period = 50.6 to 56.8ha per annum. Iceni evidence is therefore broadly in line with Savills modelling at the upper end of the range.</p> <p>Savills state that 76% of need (727ha) should be met within strategic units – this confuses strategic sites and strategic units, and so is not directly comparable to WMSESS and Alignment Paper evidence.</p> <p>Savills then compare this to the 2022 HEDNA instead of the latest evidence presented in the Alignment Papers 2024 / 2025.</p> <p>Savills derive a Rugby Borough-based need based on historic demand - equivalent to 32% of C&W need = 305ha all industrial of which 230ha is for strategic units. This compares to 2025-42 gross employment requirement for large sites (note this is not the same as strategic units) of 226ha and an overall requirement of 284ha identified in Development Needs Topic Paper. Savills apportionment to Rugby is subjective and just rolls forward historical trends</p>

4.11. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Delete paragraph 1.26 on page 14	Manse Opus and Sir Thomas White's Charity
The policy should be reworded to caveat other types of development such as modern technology and digital infrastructure.	Everwell Development and Mactaggart Family & Partners
S3 should address the need for industrial units of uses (E(g)(iii), B2 and B8) smaller than 9,000m2 as identified in the WMSESS.	Mr N Williams and Miss E Williams the landowners of Land at Mill House, Dunchurch; Mitchell, Stuart
Extend plan period	Prologis UK Limited; Mitchell, Stuart
Correct supply side errors	Prologis UK Limited
Plan for 45ha of Coventry unmet need	Prologis UK Limited; Tarmac Trading Ltd
Express requirement as a minimum as required by NPPF	Prologis UK Limited
Split requirement for B2, B8 and E(g)(iii) uses into separate requirements for needs for Rugby and needs for the FEMA with	Richborough Commercial (M45 J1)

new rows for completions and supply numbers against these categories	
Specify that employment land need is between 0.5 million and 0.95 million sqm and that this shall be met with only two new allocations: Site 15 (North of Ansty Park) and Site 95 (Crownor Fields Farm).	Allanach, Richard
Council response to modification proposals: For the reasons explained above the council does not consider any of the proposed modifications are needed to address issues of soundness.	

POLICY S4 SITES FOR GYPSIES AND TRAVELLERS

4.12. Six representations on behalf of 113 people or organisations argued that policy S4 is unsound. Two representation on behalf of 299 persons or organisations argued that the policy is sound. The following main issues were raised with Policy S4.

Issue	Potentially too few pitches planned for the whole plan period with potential to call into question if the plan has been positively prepared in this regard
Who raised the issue	Rooney, John and Patrick
No. raising the issue	2
Council response	<p>This comment is understood to be raising the issue of inadequate supply rather than questioning the requirement evidence.</p> <p>In relation to supply, the supply position is set out in the Gypsy and Traveller Supply Position Note (SD10). This shows 68 pitches of supply identified against a requirement for 94 pitches 2024-2042. This is adequate to provide supply up to 2037 i.e years 1-14 of the plan period. Planning Policy for Traveller Sites para 10 requires, in producing a local plan, authorities to identify a supply of specific deliverable sited for years 1-10 and ‘where possible’ for years 11-15. The council has done this. Therefore, the plan submitted is consistent with national policy.</p>

Issue	Lost opportunity to allocate a larger number of pitches at Bryants Bungalow site to meet longer term needs and improve soundness of the plan
Who raised the issue	Rooney, John and Patrick
No. raising the issue	2
Council response	The council has assessed the ability to accommodate further pitches at Bryants Bungalow. The additional areas suggested by the landowner are affected by flood risk and so the council’s view is that there are not further opportunities for intensification at the site.

Issue	Policy should be expanded to require enforcement action by RBC for sites which are subsequently developed without consent
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	Enforcement action is taken when considered expedient. This needs to be assessed on a case by case basis. The council cannot through a local plan bind future decision-makers to take enforcement action.

Issue	S4 is unsound because it does not direct Gypsy & Traveller pitches towards the most sustainable locations where harm to the Green Belt is avoided/exceptional circumstances not demonstrated
Who raised the issue	Manse Opus and Rolls Royce Plc; Stoford Properties Ltd; BRAID (Barnacle Residents)
No. raising the issue	109
Council response	The Council's case on exceptional circumstances for Green Belt release for Gypsy and Traveller pitches is set out in the Green Belt Exceptional Circumstances Topic Paper (document GBD4).

Issue	It is unclear whether the Council has assessed the potential for additional pitch development on existing sites and the occupancy of permanent pitches to address the shortfall or considered the issue of unauthorised encampments in the Borough, both specifically recommended in the GTAA.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	<p>The council has assessed the potential for additional pitches on existing sites as identified in table 6.4 of the GTAA. This was how the opportunity for additional pitches at Bryants Bungalow and the new site at Wilshere Ranch which area proposed allocations were identified. These opportunities have been taken up.</p> <p>The GTAA also identified opportunities for the regularisation of temporarily permitted or unauthorised pitches. There were principally at Top Park, Barnacle (which at the time was part temporarily authorised and part unauthorised, but now all has temporary permission) and at Rosefields. All of these sites are proposed for allocation in the plan. Therefore, the council has taken up these opportunities.</p>

Issue	Five year land supply for gypsy and traveller pitches not identified as required by PPTS para 10.
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Who raised the issue	Miller Homes
No. raising the issue	1
Council response	The Gypsy and Traveller Supply Position Note (SD10) sets out the supply position. This shows a five year supply can be demonstrated on plan adoption. This document will be updated as necessary through the examination.

Issue	Allocations at Top Park are unsound because the existing pitches are primarily not occupied by members of the Traveller community (advertised for rent on the open market) and genuine need is therefore unjustified.
Who raised the issue	BRAID (Barnacle Residents)
No. raising the issue	107
Council response	The need assessment was based on the GTAA research with visits to sites and discussion with members of the Gypsy and Traveller community. If pitches are being rented to non-Gypsy/Traveller occupants in contravention of the terms of a temporary planning permission, then this should be reported as an enforcement enquiry which would be investigated by the council's planning enforcement officers.

Issue	Increase in areas committed to G&Ts around Shilton, Ansty & Barnacle will exacerbate existing problems to local community.
Who raised the issue	Foss, Jeremy
No. raising the issue	1
Council response	<p>The local plan proposed allocations of pitches in this area at Top Park, Barnacle (22 pitches) and at Wilsher Ranch, Shilton (4 pitches). The pitches at Top Park already benefit from temporary planning permission. Approximately half of the pitches on that site have been occupied for more than 20 years and the remaining half since approximately 2020. The 4 pitches at Wilsher Ranch are therefore the only “new” pitches proposed through the plan in this area.</p> <p>As discussed in the Green Belt Exceptional Circumstances Topic Paper (GBD4) and as has been made clear in responses to consultations undertaken in the preparation of this plan there are clear resident concerns about the concentration of pitches in this part of the borough. As set out in the topic paper, the council considers that the need to deliver supply tells in favour of the allocation of pitches where opportunities exist. However, this will be a matter to be considered through the examination.</p>

POLICY S5 COUNTRYSIDE PROTECTION

4.13. 100 representations on behalf of 1,144 people or organisations argued that policy S5 is unsound. Two representations on behalf of 885 people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Local Plan allocates 1500 homes on land to be released on Green Belt - policy to protect Green Belt is therefore not followed
Who raised the issue	James , Charles; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Spencer, June; Court, Gerry & Carol; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Penman, Judith; Cunliffe, Stephen; Hilliard, Robert; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Yates, Alan; Hawkins, John; Crosby, Ralph; Crosby, Sheila; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Leach, Wendy; Cox, Roger; Black, John; Hawkins, Rachel; White, Claire; White, Garrie; Nycz, Janina; Chrimes, Brian; Wiltshire, Lindsay; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; West, Annette; Gillman, Sarah Elizabeth; CPRE; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Long Lawford Residents ; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; William Davis Homes (site 315); Gillman, Keith Neville; Reeve, Michael David; Lumsden, Jennifer; Wolston Parish Council; Reeve, Kathleen; Ward, John; Fisher, Hilary; Fisher, Michael; Kelly, Patrick and Linda; Sheffield, Andy; Downes, Steve and Allyson; Hilliard, Sharon; Lovett, Lorna; Lovett, Peter; Lee, Joanne
No. raising the issue	817 (including group responses)
Council response	<p>The issue here is the proposed allocation of residential sites in the Green Belt (policy S6) and the overall strategy for homes (policy S2) rather than policy S5 itself. Matters relating to the Green Belt status of specific sites are dealt with in the section for policy S6 below, but the broader point is addressed here.</p> <p>National policy on the alteration of established Green Belts is laid out in NPPF (2024) paragraphs 145-148. In sum, these specify that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans, that such circumstances include instances where an authority cannot meet its identified need for homes through other means, and that the demonstration of exceptional circumstances is dependent on all other reasonable options having been fully examined. The NPPF then goes on to state that when Green Belt release is necessary, plans should prioritise previously developed land, then undeveloped grey belt, and finally other Green Belt locations – while keeping in mind the need to promote sustainable patterns of development.</p> <p>As explained in pages 21-32 of the Green Belt Exceptional Circumstances Topic Paper (GBD4), the Council’s position is that exceptional circumstances exist for the release of Green Belt for residential development. These circumstances are demonstrated via the assessment and subsequent rejection of all other reasonable options, and the sustainability and other benefits of the proposed Green Belt allocations.</p>

	Given the above, the Council's position is that the release of Green Belt for residential allocations proposed by the plan is consistent with national policy and does not undermine policy S5 which, if adopted, shall continue to afford protection to the Green Belt moving forward.
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Issue	The Council's evidence is contrived and seeks to identify large areas of Green Belt as 'Grey Belt' - these areas are needed to safeguard the countryside from encroachment.
Who raised the issue	Ling, Philip; Mooney, Diane; Jackson, Geoff; Penman, Judith; Hilliard, Robert; Winterburn, Gillian; Winterburn, Stephen; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crosby, Ralph; Crosby, Sheila; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Leach, Wendy; Cox, Roger; Ward, Samantha ; Hawkins, Rachel; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; West, Annette; Gillman, Sarah Elizabeth; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; Gillman, Keith Neville; Reeve, Michael David; Thompson, Ian & Angela; Lumsden, Jennifer; Reeve, Kathleen; Ward, John
No. raising the issue	60
Council response	<p>This issue is about the Green Belt Contribution Study (GBD1 and GBD2) which forms part of the plan's evidence base. The Study was undertaken by a suitably qualified team from an independent consultancy using a methodology that aligns with national guidance. The Study does identify much of the borough's Green Belt as potentially meeting the definition of grey belt; however, this is only a result of a dispassionate and transparent application of the methodology – the Study does not 'seek' or actively set out to identify any particular areas as grey belt. Furthermore, due to the way that grey belt is defined by national policy, the contribution that an area makes to safeguarding the countryside from encroachment (Green Belt purpose C) has no bearing on its grey belt status. Therefore, as is recognised by the Study, land can both contribute to purpose C and meet the definition of grey belt.</p> <p>In sum, the council deem the Green Belt Contribution Study to be a robust piece of evidence which aligns with national policy and guidance on the subject.</p>

Issue	Policy should be linked to EN3 and I5 to ensure there is no inappropriate development in Rainsbrook Valley
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	The policy already applies to the Rainsbrook Valley because it is outside of settlement boundaries. The council does not deem it necessary to explicitly link the policy to EN3 and I5.

Issue	S5 is unsound because it prevents the potential development of data centres and other essential digital infrastructure in rural locations.
Who raised the issue	Everwell Development and Mactaggart Family & Partners
No. raising the issue	1
Council response	It is unclear what “digital infrastructure” refers to. Telecommunications infrastructure would be covered by Policy I3 Communications infrastructure. Data centres are a form of employment development, often classified as a use class B8 use. S5 in combination with policy E2 does provide for circumstances in which employment development outside of settlement boundaries will be permissible.

Issue	Policy S5, and criterion A is contrary to the emerging NPPF Policy S5 criterion J, which applies to employment development where it is well related to an existing settlement, or it is for storage and distribution uses.
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The plan has been produced under the legacy planning system and therefore it is not reasonable to expect its policies to fully align with emerging national policies that are yet to be implemented. S5 in combination with policy E2 does provide for circumstances in which employment development outside of settlement boundaries will be permissible.

Issue	Level of grey belt designation is not consistent with the obligations in the NPPF to ensure separation of urban communities and prevent damage to wildlife & environment.
Who raised the issue	Thompson, Ian & Angela
No. raising the issue	2
Council response	This policy (S5) does not designate areas of grey belt, but the Green Belt Contribution Study (GBD1 and GBD2) does identify much of the Borough’s Green Belt as potentially meeting the definition of grey belt. This is the result of a transparent methodology that aligns with national guidance. Areas that are found to contribute strongly to preventing neighbouring towns from merging (Green Belt purpose B) are not identified as grey belt, and therefore it is not the case that the results of the study are inconsistent with the NPPF in this regard. Preventing harms to wildlife and the natural environment are not purposes of the Green Belt per national policy, these matters are dealt with by separate national and local planning policies.

Issue	Site 145 (Brandon Lane) should be assessed as a grey belt site, released from the Green
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	Belt and allocated for employment uses.
Who raised the issue	Windsor Development (Site 145)
No. raising the issue	1
Council response	The Council does not agree that the site meets the grey belt definition. Per the Green Belt Contribution Study (GBD1 & GBD2), it is deemed that the area in which the site is located makes a strong contribution to Green Belt purpose A. The Council has decided not to allocate the site, because of the reasons specified in the HELAA proforma (SS3, p.153), and therefore does not agree that there are grounds to release it from the Green Belt.

4.14. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
S5(A) should be clarified to specify that development will not be refused for being outside of settlement boundaries when it is on an allocated site.	Inside Land Group
The policy should specify that, when applying Green Belt policy, the delivery of nationally or regionally significant digital and data-processing infrastructure may constitute "very special circumstances"	Everwell Development and Mactaggart Family & Partners
Amend para B to require any development in the countryside to demonstrate that the character of the countryside is maintained to retain the countryside's setting and separate function	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Should take a more granular view on where development can occur in the countryside to be found sound	William Davis Homes (site 315)
Omission site should be identified as grey belt land and released from the green belt for allocated development	Windsor Developments Limited; Windsor Developments (Site 145)
Make cross reference to the spatial strategy and proposed grey belt and Green Belt release based on exceptional circumstances justifications	Miller Homes (Brownsover Road)
Boundaries of the grey belt should be redrawn closer to village of Wolvey and area from A5 down to intersection of B4114 & Temple Hill roundabout should remain green belt	Thompson, Ian & Angela
<p>Council response to modification proposals:</p> <p>It is not necessary for the policy to state that development on allocated sites outside of settlement boundaries will be supported because local plans are read as a whole.</p> <p>It is not necessary to reference specific potential very special circumstances.</p> <p>The policy is not a landscape/character policy and so introducing this creates duplication.</p> <p>The plan does not define green belt boundaries.</p> <p>Overall, the council does not consider modifications are needed to address issues of soundness.</p>	

POLICY S6 RESIDENTIAL ALLOCATIONS

- 4.15. 205 representations on behalf of 956 people or organisations argued that policy S6 is unsound. 24 representations on behalf of 322 people or organisations argued that the policy is sound.
- 4.16. Some respondents completed the representation form to comment only on the soundness of a specific site allocation and not Policy S6 overall. These representations are counted against the individual site allocations below but not against S6. As site allocations are listed in S6, this means that a higher number of respondents objected to S6 than is captured in the numbers above.
- 4.17. The following main issues were raised with Policy S6. Below the overall issues raised in response to Policy S6 are listed the main issues raised in respect of each of the proposed residential site allocations in the Proposed Submission Local Plan.

Issue	There isn't analysis under para 110 and 115 NPPF of how green belt allocations would promote sustainable development or how the requirement in 149e) that Green Belt boundaries will not need to be altered at the end of plan period. Stage 2 Green Belt evidence needed for the 10 Green Belt sites that were considered as 'grey belt'.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	<p>NPPF para 148 states in reviewing Green Belt boundaries the need to promote patterns of sustainable development should determine whether a site's location is appropriate with particular reference to paras 110 and 155 NPPF. NPPF Paragraph 110 is about actively managing patterns of growth to support the transport objectives in paragraph 109 and focussing significant development on locations which are or can be made sustainable. Paragraph 115 is about prioritising sustainable transport, safe and suitable access, the design of streets and mitigating significant impacts from development on the transport network.</p> <p>It is clear from the evidence base that the sustainability of site allocations in transport terms by reference to the considerations in paras 110 and 115 has been a major consideration in preparing the plan. For example, the Stage 2 Site Assessment Report (SS8) includes for every site as its first topic area "Transport". This section includes a discussion of transport considerations affecting the site, analysis undertaken using the DfT Connectivity Tool, PTAL and congestion analysis derived from transport network analysis by SLR (documents SS15-SS18), together with where relevant reference to the Strategic Transport Assessment (documents I3-I6) and site access considerations.</p> <p>The transport evaluation then features prominently in the overall evaluation of each site. The Strategic Transport Assessment prioritises sustainable transport measures in its mitigation proposals, and these are tied back to individual sites by their inclusion in the site development requirements in the site allocations annex to the plan.</p> <p>Similarly, within the Sustainability Appraisal (CD5) transport is one of the headings in the SA Framework and is prominent in the discussion of spatial strategy options and in some</p>

	<p>cases individual sites.</p> <p>Transport considerations are also prominent in:</p> <ol style="list-style-type: none"> 1. in the Rural Sustainability Study Report (SD14) which makes public transport accessibility an important factor in assessing the sustainability of rural settlements, and 2. in the Green Belt Exceptional Circumstances Topic Paper (GBD4), particularly in its discussion of the impacts of different spatial strategy options for employment on community patterns. <p>Green Belt release for housing is located at main rural settlements which are the most sustainable rural locations in terms of access to services and transport links. The largest Green Belt allocation is at Long Lawford which is the Green Belt settlement with the strongest public transport and active transport connections to Rugby.</p> <p>In relation to NPPF paragraph 149e), the plan identifies land to meet housing and employment needs in full. Where land is allocated for development in the Green Belt, this land is removed from the Green Belt now rather than identifying broad areas and leaving Green Belt changes to a later plan. New defensible Green Belt boundaries are identified and, where necessary (for example south of Long Lawford) proposed to be created/reinforced through development requirements. This approach is consistent with NPPF para 149e) in that it creates no obvious need to alter Green Belt boundaries at the end of the plan period.</p> <p>However, it is not realistically possible to make an assessment now of whether green belt boundaries will need to be altered in 2042. Such an assessment would be pure speculation, in the same way as plan-makers working on the Rugby Core Strategy in 2010 would not have been able to predict the need for Green Belt changes to be proposed in 2026.</p> <p>In relation to the ‘grey belt’ sites, the stage 1 contribution assessment identified these as lying within areas of the borough suitable to be defined as grey belt. In the borough the principal purpose determining whether sites are grey belt purpose a) “to check the unrestricted sprawl of large built-up areas”. Locations defined in the stage 1 assessment as provisionally grey belt were principally so defined because of their distance from the large built-up areas. This means that it was considered very unlikely that a stage 2 assessment of these sites would contradict the stage 1 finding and find strong contribution to purpose a), b) or c). Accordingly, a proportionate approach to evidence gathering was taken and these sites were not subject to more detailed assessment. This was an appropriate approach.</p>
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Issue	The residential site allocations contradict other strategic policies including S1 which directs development to the urban area (insufficient use of brownfield sites), and S5 which seeks to protect Green Belt land.
Who raised the issue	Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Spencer, June; Ling, Philip; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Fitzgerald, Elizabeth; CPRE; Kang, Jane; Monks Kirby Parish Council; Miller Homes (Brownsover Road); Hassell, Eve
No.	18

raising the issue	
Council response	<p>In line with national policy the council's approach has been to look at opportunities within the urban area first. It undertook the Urban Capacity Study (documents SS6-7), and this has informed a raft of site allocations within the urban area which would deliver 698 homes. Beyond these allocations, the council has not been able to identify further developable urban sites that could remove the need for greenfield development.</p> <p>True to the settlement hierarchy, the plan includes new non-Green Belt urban expansions at Rugby at Newton Manor Lane and Crick Road south of Houlton which would accommodate 535 homes. Combined with the carried forward allocations at South West Rugby and Houlton and other commitments, this would mean (excluding small site windfalls) 82% of the new homes to be built in the borough between 2025-2042 being built at the town of Rugby. This is consistent with Rugby's position at the top of the settlement hierarchy.</p> <p>The remaining need would be met at main rural settlements, again this is consistent with their position as the second tier in the settlement hierarchy in Policy S1.</p> <p>In relation to the justification for Green Belt release, the council's position on this is outlined in detail in the Green Belt Exceptional Circumstances Topic Paper (GBD4).</p>

Issue	Green Belt exceptional circumstances not demonstrated/Green belt release not justified or disproportionate in scale (51% of new allocations) - non-Green Belt should be prioritised
Who raised the issue	Yates, Alan; Monks Kirby Parish Council; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; CPRE; Mr and Mrs Hudson; Persimmon Homes (Central); Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Catesby Strategic Land; Kang, Jane; Critchley, P; Miller Homes; Miller Homes (Brownsover Road); Midlands Land Portfolio; MacKenzie Miller Homes
No. raising the issue	23
Council response	<p>Not all respondents framed this issue in the same way, but they are grouped together for the purposes of conciseness. Some responses called for the development of grey belt land before non-grey belt Green Belt.</p> <p>As above, the justification for Green Belt release is set out in the Green Belt Exceptional Circumstance Topic Paper.</p> <p>In relation to the scale of Green Belt release, 1,436 homes are proposed on land to be released from the Green Belt through new allocations in this plan. Of these, 686 homes are on land identified in the evidence base as grey belt. This means ~50% of new housing allocations in the plan are on Green Belt with and this in turn splitting 48% grey belt, 52% non-grey-belt Green Belt. However, new allocations make up less than a quarter of new housing to be delivered in the plan period. Of all new housing to be delivered in the borough in the period to 2042, 6% is on Green Belt that is proposed to be released through</p>

	this plan and 6% is on grey belt proposed for release.
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Issue	Allocation of 58% of new development (outside of existing allocations and permissions) in rural areas is unsound and unjustified
Who raised the issue	James , Charles; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Court, Gerry & Carol; Spencer, June; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Penman, Judith; Hilliard, Robert; Brannigan, Jonathon; Higginson, Helen; Crosby, Ralph; Crosby, Sheila; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; Cox, Roger; Ward, Samantha ; Russell, Pauline; Black, John; Bassett, Graham; White, Claire; White, Garrie; Pitt, Janina; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Whitlock, Noel; Mallabone, Paul; Mallabone, Joanne; Lumsden, Peter; CPRE; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Long Lawford Residents ; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; Pailton Parish Council; Ward, Jane; Fisher, Hilary; Fisher, Michael; Kelly, Patrick and Linda; Sheffield, Andy; Downes, Steve and Allyson; Hilliard, Sharon; Bailey, Andrew; Briggs, Georgina; Lee, Joanne
No. raising the issue	596 (including group responses)
Council response	This raises a similar issue to the preceding points about Green Belt and development in the Rugby urban area. However, this issue is broadened to include all rural development. As is explained above, the council has considered Rugby urban area and Rugby urban expansion sites first before development at villages. Development remains heavily weighted towards Rugby.

Issue	No evidence that diversifying sites will diversify the type of house built, provide opportunities for small builders or lead to quicker development
Who raised the issue	Yates, Alan; CPRE
No. raising the issue	2
Council response	This comment refers to a point made by the council in justification for Green Belt release in the Green Belt Exceptional Circumstances Topic Paper (GBD4). In outline the Council's position is that: - Current housing commitments from the last local plan are heavily focussed on three large greenfield urban extensions to Rugby: Houlton, Eden Park and South West Rugby. Together these sites are projected to deliver 7,167 homes, circa 66% of the requirement. - Although they remain vital, the council has identified the following issues with the focus on these sites: (a) They have significant infrastructure requirements and in the case of

	<p>South West Rugby have been slow coming forward (b) in the case of South West Rugby and Houlton they are delivering/are likely to deliver less than policy target levels of affordable housing (c) they are delivering similar types of housing in similar locations, generally developed by volume housebuilders.</p> <p>- To address these issues, the new local plan includes a more diverse range of site sizes and locations. 35 sites allocations are made through the plan. All new allocations are of sites for fewer than 500 homes in capacity and 27 of them are for sites for fewer than 100 homes. There is clear evidence, for example consultancy Lichfields' <i>Start to Finish</i> research that sites of this size deliver more quickly than larger sites.</p> <p>- There is also clear evidence in the Whole Plan Viability Assessment (document I1) that smaller greenfield sites particularly in the higher value villages are more viable and can support higher affordable housing percentages. Accordingly, the plan sets a higher percentage affordable housing requirement for these sites. This will diversity the type and tenure of sites being built.</p> <p>- There is also abundant national evidence that volume housebuilders do not generally build on small sites and that identifying more small sites is important to allowing SME builders access to land. This is why NPPF para 73 states "Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly".</p> <p>- The plan diversifies the type of homes being built by requiring new allocations at Warwick Road, Wolston and Home Farm, Brinklow to be delivered as bungalows or older persons accommodation and Dyers Lane Brinklow to be for self/custom build.</p> <p>- Finally, it is worth briefly explaining why a greater range of site sizes and locations will drive diversity in homes and improve delivery rates. Volume housebuilders sensibly target their product to the deepest part of the market by building estates of (largely, but not exclusively) family homes. However, not every buyer of newbuild housing wants to live in a family home on an urban expansion estate on the edge of Rugby. A diversity of sites can tap a broader market in terms of buyers' locational preferences and the type of buyers attracted. This in turn drives delivery.</p>
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Issue	Distribution of housing numbers is not aligned with sustainability scores produced in the Rural Sustainability Study - highest scoring villages Dunchurch and Binley Woods have no/few allocations while lower scoring villages have the majority
Who raised the issue	Monks Kirby Parish Council
No. raising the issue	1
Council response	First, in relation to Dunchurch it is important to recognise that circa 240 homes will be built as a northern expansion to the village through the South West Rugby allocation which is carried forward in this plan.

	<p>Dunchurch will also see significant further development close by through the remainder of the South West Rugby site.</p> <p>In relation to Binley Woods, no suitable residential sites were identified beyond the former Oakdale Nursery site (in Brandon Parish but adjacent to the village) which now has planning permission.</p> <p>The sustainability scores are not the only determinant of the scale of site allocations at each village. This is a multi-factor decision and needs to take account of the scale of existing planned development at the village and the availability of suitable sites along with other factors like infrastructure (in particular school) capacities.</p>
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Issue	Policy S6 is unsound because it does not allocate an omission site.
Who raised the issue	Linfoot Country Homes; Tarrant, John; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Cliffe Investments Ltd; Bellway Homes; Taylor Wimpey; Tayton, Steve; Wolvey Parish Council; Persimmon Homes (Central); Allesley Investments Ltd; Catesby Estates; Vistry Group; Storm Consulting; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Midlands Land Portfolio; Mackenzie Miller Homes; Warwickshire Property and Development Group (site 90); Brandon Estates Ltd
No. raising the issue	20
Council response	<p>This argument was framed in different ways by different promoters, often focussing on the relative merits of omission sites versus proposed allocations and how these were assessed through the site selection process and Sustainability Appraisal.</p> <p>The council has undertaken a clear and logical site selection process which is explained in the Spatial Strategy and Site Selection Methodology Summary (SS1). That process necessarily involved a range of judgements made by planning officers. It is certain that some omission site promoters will wish to dispute that evidence, potentially in some cases on a line by line basis challenging every micro judgement made therein. It will be for the inspectors to determine whether examination time should be used for this. It is noted that para 5.15 of the Procedure Guide for Local Plan Examinations states “the merits of sites not allocated in the submitted plan (known as “omission sites”) will not normally be discussed at the hearing sessions. This is because the focus of the examination is on the soundness of the submitted plan”.</p>

Issue	Housing associations can struggle with letting and management of rural affordable properties (although inclusion of some rural affordable housing is supported)
Who raised the issue	West Midlands Housing Association Planning Consortium
No. raising the issue	1
Council	It is important to note that under Policy H2 paragraph 6.9 it is clearly envisaged that the

response	<p>council will exercise some flexibility over the tenure mix of affordable housing. This can help address these concerns.</p> <p>It is also important to note that there are evidenced viability challenges for delivering affordable housing on:</p> <ul style="list-style-type: none"> - the large site options considered in the evidence base (see the Viability Appraisal document I1); - the existing large Houlton and South West Rugby allocations; and - within the urban area, where viability is tighter and the affordable housing percentage in Policy H2 is accordingly lower. <p>This means that having affordable housing at villages, where higher proportions can viably be supported, is a way of boosting affordable housing delivery in the borough. Even if these locations are not viewed as the perfect locations by all RSLs, it is considered better to have more affordable housing than less.</p>
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Issue	Primary school capacity should not alone override the sequential approach to green belt at Clifton upon Dunsmore.
Who raised the issue	Mackenzie Miller Homes
No. raising the issue	1
Council response	<p>This is an argument on behalf of an omission site promoter in favour of a higher scale of development at Clifton upon Dunsmore, a non-Green Belt village. The potential to allocate more development at Clifton upon Dunsmore was discussed in paragraphs 2.155 to 2.158 of the Green Belt Exceptional Circumstance Topic Paper (GBD4).</p> <p>Primary school capacity is an important factor influencing the decision on the scale of growth at Clifton upon Dunsmore but is not the only factor. Landscape, coalescence and for some sites heritage impact concerns also informed decisions about the scale of growth at the village.</p> <p>The council do not agree that it is reasonable or sustainable to 'avoid the green belt at all costs' by concentrating development at the borough's non-Green Belt villages despite their greater constraints.</p>

Issue	The plan claims that development in green belt villages will 'ensure the sustainability of rural primary schools' yet proposes allocations in a village where demand is already greater than supply at the school.
Who raised the issue	Yates, Alan
No. raising	1

the issue	
Council response	<p>This comment relates to Stretton-on-Dunsmore. The Education Topic Paper (document I11). The topic paper notes that although there is projected to be demand in excess of available places at Knightlow Primary School in Stretton-on-Dunsmore this is likely to simply result in the school admitting fewer pupils than it presently does from outside of its priority area (catchment). There is no clear evidence of need for school expansion, but this will be kept under review by the LEA.</p> <p>To the representor's point, there isn't a need for development at Stretton on Dunsmore to sustain Knightlow School because that school is a successful and popular school that draws from outside the village. However, building homes in the village would likely reduce travel distances to the school. Also, it cannot be assumed that the school will continue to draw pupils from a wide area forever as the reputations of schools can wax and wane.</p>

Issue	Further growth should be encouraged at main rural settlements due to issues with delivery at Rugby.
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	The plan proposes a level of housing at Rugby that it considers is deliverable through the plan period. The council's response in relation to the deliverability of sites at South West Rugby and Houlton is outlined in response to an issue raised under Policy S2 above.

Issue	The land supply is overly reliant on development at SUEs. These aren't robustly demonstrated to be deliverable.
Who raised the issue	Catesby Strategic Land
No. raising the issue	1
Council response	<p>This comment supports development at Rugby but considers it too reliant on the urban extensions. The council is surprised to see Catesby questioning the deliverability of the South West Rugby urban extension given that it is a major landowner within that site and has submitted a planning application for its land.</p> <p>The council's response in relation to the deliverability of sites at South West Rugby and Houlton is outlined in response to an issue raised under Policy S2 above.</p>

4.18. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications. Recommended modifications for individual sites are addressed below alongside

the main issues for that site. Requests to delete a site have not been addressed.

Modification summary	Proposer(s)
Proposed units for each site should be expressed as a minimum.	Inside Land Group; Newton LDP; Avon Timber Builders Ltd
The text of the development site allocations annex should not be read as part of the allocations policy (S6 or S7), and the principles should be less prescriptive.	Inside Land Group
Remove/reduce Green Belt allocations (generally or a specific site) and replace them with alternative non-Green Belt allocations.	Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Kang, Jane; Critchley, P; Brandon Estates Ltd; Bassett, Philip; Bassett, Ann; Bearne, Andrew; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella
Allocate an omission site	Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Bellway Homes; Catesby Strategic Land; Kang, Jane; Critchley, P; Catesby Estates; Vistry Group; Storm Consulting; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Warwickshire Property and Development Group (site 90); Dignan, Peter
Housing numbers in S6 should be expressed as approximate figures, allowing flexibility (both up and down).	Tritax Park Rugby West Limited
Review and amend Stage 2 Green Belt assessment to reflect lower contribution to land north west of Rugby to preventing urban sprawl	Tarmac Trading Ltd
Development requirements set out in the Site Allocations annex should be updated for sites 62, 332, 353, 283, 350, 351, 354, 355, 279, 153, 294, 356, 357, 352, and 349 to include "Contributions may be sought towards delivery of highways and active travel mitigation schemes listed in Appendix K of the South West Rugby Masterplan SPD".	Taylor Wimpey Strategic Land
Replace the Brinklow allocations with new allocations for 145 dwellings as identified by Brinklow Parish Council.	Brinklow Parish Council
Allocate 175 units at Site 96. Site should be allocated on either side of Coventry Road but should not extend beyond the existing building line created by Hollick Way and Brookfield Drive to the west of Coventry Road.	RBC Conservative Group
Allocate the five sites recommended by the UCS which have not been allocated and increase the	Allanach, Richard

densities/capacities of urban brownfield allocations in line with the recommendations of the UCS.	
Council response to modification proposals: The majority of modifications recommended for this policy relate to site selection and development requirements which are addressed in the main issues for this policy or under individual sites.	
The allocated unit figure is already expressed as an approximate number of units (“circa”) and there is some flexibility to increase or decrease the allocation at application stage subject to site-specific circumstances and justification.	

SITE 54 OAKDALE NURSERY, BRANDON

4.19. Two representations on behalf of two people or organisations argued that the allocation of site 54 is unsound. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing
Who raised the issue	Farmer, Antony
No. raising the issue	1
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. This site now has planning permission (R24/0716) subject to a S106 agreement.

Issue	Brownfield should be used instead of Green Belt land / No special circumstances to demonstrate the requirement to remove land from the Green Belt
Who raised the issue	Farmer, Antony; Timms, Heather
No. raising the issue	2
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt and part of the site is previously developed land. This site now has planning permission (R24/0716) subject to a S106 agreement.

4.20. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Require the development to mitigate its impact on Brandon Little Wood through the use of buffer zones and locating housing adjacent to the A428.	Allanach, Richard
Council response to modification proposals: This would be handled as part of a reserved matters application when site layout is considered more closely. The development will need to demonstrate it will not cause adverse impacts on Brandon Little Wood LWS.	

SITE 337 WEST FARM AND HOME FARM, BRINKLOW

4.21. 36 representations on behalf of 306 people or organisations argued that the allocation of site 337 is unsound. One representation arguing the allocation of the site is sound was recorded. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (GP, hospitals etc) to support new housing making this an unsustainable location for development contrary to S1
Who raised the issue	Farmer, Antony; Lowe, David; Lowe, Clare; Hatton, Barbara; Handslip, Peter; King, David; Drew, Sally; Monks Kirby Parish Council; Gillias, Anthony; Mellors, Ellen; Reeve, John and Maggie; Brinklow Parish Council; Taylor, Gillian; Hayhurst, Amanda; Lloyd, Deborah; Handslip, Marilyn; England, Amanda; Johnson, Linda and Gary
No. raising the issue	19
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4.

Issue	Green Belt location is contrary to national policy
Who raised the issue	Farmer, Antony; Wright, Matthew; Handslip, Peter; Monks Kirby Parish Council; Brinklow Parish Council; Hayhurst, Amanda; Lloyd, Deborah; Parsons, Chris; Handslip, Marilyn
No. raising the issue	9
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt and part of the site is brownfield land.

Issue	Heightened flood risk from the development
Who raised the issue	Wright, Matthew; Drew, Sally; Brinklow Parish Council; Handslip, Marilyn; Johnson, Linda and Gary
No.	6

raising the issue	
Council response	The Level 2 Strategic Flood Risk Assessment (SS9) and Sequential Test (SS14) found the site to be at low risk of flooding with no anticipated increase in flood risk elsewhere. Further site-specific flood risk assessments will be required at planning application stage.

Issue	Traffic issues - Single access to site from Rugby Road will make traffic levels unmanageable and create issues for emergency vehicles. Site would lead to increased risk of accidents on this road and parking issues will be exacerbated.
Who raised the issue	Makepeace, T B; Hatton, Barbara; Monks Kirby Parish Council; Reeve, John and Maggie; Brinklow Parish Council; Taylor, Gillian; Hayhurst, Amanda; Handslip, Marilyn; England, Amanda
No. raising the issue	9
Council response	The Strategic Transport Assessment (I3) did not identify any significant issues arising from this site allocation. A site specific transport assessment and further site access drawings will be required at planning application stage.

Issue	Harms to a historic village including the conservation area and heritage asset Brinklow Castle - density would be inappropriate for the setting
Who raised the issue	Handslip, Peter; Gillias, Anthony; Brinklow Parish Council; Hayhurst, Amanda; Lloyd, Deborah; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Handslip, Marilyn; England, Amanda; Kang, Jane; Critchley, P; Barrett, R F; Johnson, Linda and Gary
No. raising the issue	18
Council response	The site was subject to a heritage assessment (SS19) which recommended combined development of the two constituent sites for 60-80 dwellings and identified mitigatory measures to limit heritage impacts. Developable land is restricted to the existing brownfield land, avoiding areas of higher heritage sensitivity.

Issue	Scale of proposed development is disproportionate to the existing size of the village which will damage character and heritage
Who raised the issue	Hilliard, Robert; King, David; Drew, Sally; Monks Kirby Parish Council; Brinklow Parish Council; King, Thelma; Lloyd, Deborah; Handslip, Marilyn; England, Amanda; Johnson, Linda and Gary; Hilliard, Sharon
No. raising the issue	12
Council response	The scale of this allocation is considered commensurate with the services available in Brinklow and local housing needs. The heritage assessment (SS19) recommended the site be allocated for 60-80 units to minimise heritage impacts. The total quantum of development at Brinklow has been reduced by 90 units since the

	Preferred Option consultation.
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Issue	Unsuitable and unsustainable location for older persons housing due to reliance on car travel to access most services and limited bus routes
Who raised the issue	Mellors, Ellen; Handslip, Marilyn; Johnson, Linda and Gary
No. raising the issue	4
Council response	Brinklow scores relatively well in the Rural Sustainability Study (SD14) with local access to GP surgery, café, pubs and community facilities. The allocation will meet local need for older persons' specialist housing.

Issue	Focus on homes for over 55s will make the site unviable – wider mix would be preferable
Who raised the issue	Pailton Parish Council
No. raising the issue	484
Council response	The allocation of the site for over 55s housing will reduce pressures on home-to-school transport and meet local housing needs for older people in the village. This type of development has been successfully brought forward in the borough, and it is considered that there are clear opportunities for this to be viably developed in Brinklow in Brinklow which is a location with comparably high property values.

Issue	Pressure on sewage system from additional housing could lead to raw sewage being discharged into river
Who raised the issue	Ainsworth, Stephen
No. raising the issue	1
Council response	The Stage 2 Water Cycle Study (I10), produced in consultation with Severn Trent Water found there to be low potential for impact on sewerage infrastructure from this site with no known network constraints

Issue	Effective removal of a rural business that has operated for many years and provides permanent & seasonal employment for local people
Who raised the issue	Ainsworth, Stephen
No. raising the issue	1
Council	Both farm sites were submitted by the respective landowners as part of the Call for Sites

response	and were therefore considered for residential development. Policy E3 looks to support diversification and growth of rural businesses
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Issue	Component sites of 337 both had access onto B4455 giving a total of 3 access points for new housing in Brinklow. No cumulative impact assessment from this site and site 315 accessing on both sides of the road
Who raised the issue	Brinklow Residents
No. raising the issue	269
Council response	The Strategic Transport Assessment (I3) did not identify any significant issues arising from this site allocation. A site specific transport assessment and further details of the site access strategy will be required at planning application stage. The allocation of the component sites as a single allocation will ensure a joined-up approach to its development.

4.22. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Relax restriction of any built development on the eastern side of the site to allow for appropriate development e.g. green space shelter which would not harm setting of heritage assets	Burson, David obo West Farm Landowners
Amend requirement to reroute existing public rights of way (PRoW) as only required where appropriate	Burson, David obo West Farm Landowners
Layout of development needs to clearly show the routes of the current PRoW & demonstrate that they will not be obstructed during construction or when complete	Ainsworth, Stephen
Council response to modification proposals: The current development requirements are designed to ensure a high-quality and sustainable development outcome at this site. Considerations relating to specific layouts can be discussed at detailed application stage and be managed through conditions.	

SITE 315 LAND SOUTH OF RUGBY ROAD, BRINKLOW

4.23. 57 representations on behalf of 328 people or organisations argued that the allocation of site 315 is unsound. The following main issues were raised with this site allocation:

Issue	Unsustainable location for significant housing due to lack of schools, doctors etc and general infrastructure creating reliance on car travel - contrary to S1 and national policy section 2
Who raised	Bostock, Tom; Lowe, David; Lowe, Clare; Corbey, Clifford; Hatton, Barbara; Handslip, Peter; Drew, Sally; Monks Kirby Parish Council; Ward, Philip; Ward, Allison; Ward, Olivia;

the issue	Ward, Charlie; Mellors, Ellen; Brinklow Parish Council; Cardwell, Joanna; Brandon & Bretford Parish Council; Lloyd, Deborah; Fletcher, Mary; Fletcher, Paul; Handslip, Marilyn; Johnson, Linda and Gary; Brinklow Residents
No. raising the issue	291
Council response	Brinklow scored well in the Rural Sustainability Study (SD14) for its access to facilities such as GP surgery, café, pubs and reception-age schooling. Travel by bus is also possible to Rugby and Coventry.

Issue	Scale of growth is disproportionate to the size and identity of the village and infrastructure available - congested roads, GP surgery at capacity, no school locally
Who raised the issue	Bostock, Tom; Farmer, Antony; Giles, Yvette; Corbey, Clifford; Hilliard, Robert; Handslip, Peter; King, David; Brittain, Helen; Drew, Sally; Blakeway, Neil; Monks Kirby Parish Council; Linfoot Country Homes; Ward, Allison; Ward, Olivia; Ward, Charlie; Mellors, Ellen; Brinklow Parish Council; King, Thelma; Cardwell, Joanna; Lloyd, Deborah; Whiteford, James; Smith, Joanne; Fletcher, Mary; Fletcher, Paul; Handslip, Marilyn; England, Amanda; Barrett, R F; Pailton Parish Council; Johnson, Linda and Gary; Allen, Roger; Brinklow Residents ; Hilliard, Sharon; Lee, Joanne
No. raising the issue	302
Council response	The scale of this allocation is considered commensurate with the services available in Brinklow and the housing needs of the borough. The total quantum of development at Brinklow has been reduced by 90 units since the Preferred Option consultation.

Issue	Adverse impacts on heritage assets such as listed buildings and Brinklow Castle, loss of location for cultural events such as scarecrow festival
Who raised the issue	Bostock, Tom; Giles, Yvette; Drew, Sally; Ward, Philip; Ward, Allison; Ward, Olivia; Ward, Charlie; Gillias, Anthony; Brinklow Parish Council; Lloyd, Deborah; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Handslip, Marilyn; England, Amanda; Kang, Jane; Critchley, P; Johnson, Linda and Gary; Brinklow Residents
No. raising the issue	291
Council response	The site was subject to a heritage assessment (SS19) which recommended restricting development to the easternmost field of the site to protect the ridge and furrow on the western field and mitigate impacts on the setting of heritage assets. This approach has been implemented in the proposed submission local plan.

Issue	Inappropriate use of Green Belt - brownfield and non-Green Belt should be prioritised
Who raised the issue	Farmer, Antony; Wright, Matthew; Giles, Yvette; McDonnell, Angela; Handslip, Peter; Brittain, Helen; Blakeway, Neil; Monks Kirby Parish Council; Ward, Philip; Ward, Allison; Ward, Olivia; Ward, Charlie; Mellors, Ellen; Brinklow Parish Council; Cardwell, Joanna; Lloyd, Deborah; Smith, Mark; Fletcher, Mary; Fletcher, Paul; Parsons, Chris ; Handslip, Marilyn; RBC Conservative Group; Brinklow Residents
No.	306

raising the issue	
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt land.

Issue	Loss of quality agricultural land and hedgerows contrary to national policy
Who raised the issue	Currington, Ian; Brittain, Helen; Blakeway, Neil; Brinklow Parish Council; Smith, Joanne; Fletcher, Mary; Ainsworth, Stephen; Brinklow Residents
No. raising the issue	276
Council response	The site is grade 3 agricultural land so is not considered Best and Most Versatile.

Issue	Traffic and access issues - access from Brays Close and Heath Lane will exacerbate existing congestion in these areas; Heath Lane is too narrow
Who raised the issue	Owen, Peter; Lowe, David; Lowe, Clare; McDonnell, Angela; Makepeace, T B; Hatton, Barbara; Handslip, Peter; Brittain, Helen; Blakeway, Neil; Ward, Philip; Ward, Allison; Ward, Olivia; Ward, Charlie; Mellors, Ellen; Brinklow Parish Council; Cardwell, Joanna; Fletcher, Mary; Fletcher, Paul; Handslip, Marilyn; England, Amanda; Lavin, Mick; Tipper, Carol; Brinklow Residents
No. raising the issue	292
Council response	The Strategic Transport Assessment (I3) did not identify any significant issues arising from this site allocation. A site specific transport assessment and further details of the site access strategy will be required at planning application stage. Heath Lane is only proposed as a secondary access with primary access from Brays Close.

Issue	Development proposal will lead to increased flood risk
Who raised the issue	Wright, Matthew; Giles, Yvette; Makepeace, T B; Handslip, Peter; Drew, Sally; Mellors, Ellen; Brinklow Parish Council; Cardwell, Joanna; Handslip, Marilyn; Johnson, Linda and Gary
No. raising the issue	11
Council response	The Level 2 Strategic Flood Risk Assessment (SS9) and Sequential Test (SS14) found the site to be at low risk of flooding with no anticipated increase in flood risk elsewhere. Further site-specific flood risk assessments will be required at planning application stage.

Issue	Additional strain on utilities such as sewage and electricity supplies will cause disruption and extra costs
Who raised the issue	Yates, Alan; Mellors, Ellen; Brinklow Parish Council; Whiteford, James; Ainsworth, Stephen
No.	5

raising the issue	
Council response	Energy and sewerage infrastructure providers have not flagged concerns about their ability to serve this proposed development. A two-stage Water Cycle Study has been produced which assesses the impact that future growth may have on water resources, water supply infrastructure, and wastewater collection and treatment. This concludes that "Overall, no issues have been identified that would impede the progress of development sites" and that "any necessary investments or infrastructure planning can be managed through the established procedures over the course of the plan period." Seven Trent Water, the water and sewerage provider for the Borough, have been consulted throughout the plan-making process and will continue to be informed as it progresses so that infrastructure can be appropriately planned.

Issue	RBC Rural sustainability study incorrectly gives 4 points to Brinklow for having a school National policy requires development to be in locations with a choice of schooling options WCC preferred options consultation response raised concerns around cost of school transport Education Topic Paper notes that The Revel school has a projected shortfall in places
Who raised the issue	Brinklow Residents
No. raising the issue	269
Council response	The Rural Sustainability Study (SD14) does assign 4 points to Brinklow on account of the primary school annex even though this only covers Reception age schooling. It is true a score of 2 may be more reflective of this level of provision, but this would still make Brinklow the fourth highest scoring rural settlement and therefore is of no material difference to the settlement hierarchy or site selection process. The Education Topic Paper (I11) finds that there would be no shortfall in places for reception school admissions, while the whole school shortfall of places is considered marginal at 22 pupils in a 'worst case' scenario.

Issue	Site promoter's own ecology evidence includes advice for protecting biodiversity along the boundary which has not been followed (this area is now secondary access)
Who raised the issue	Brinklow Residents
No. raising the issue	269
Council response	The site promoter's ecology statement recommends a suitable buffer zone between ditches on the southern boundary and built development – this boundary is not proposed for secondary access. The development principles drawing includes reinforced planting and indicative open space alongside the secondary access boundary. The council's ecological constraints assessment (SS25 and SS27) of the site found it had medium constraints but could be developed with appropriate mitigations in place. Further assessments and consideration of BNG and other ecological measures would be

	considered at planning application stage.
Issue	Single carriageway and grade II listed Bretford Bridge is a source of congestion which will be exacerbated by increasing the number of cars through this allocation
Who raised the issue	Brinklow Residents
No. raising the issue	269
Council response	The Infrastructure Delivery Schedule (I2) sets out a potential requirement for upgrades to the existing signal control equipment, ideally in combination with adaptive signal control to minimise queueing. This would be secured via S106 agreements. The Strategic Transport Assessment (I3) did not identify this scheme as a potential requirement for site 315, but rather for residential allocations in Stretton-on-Dunsmore, Ryton-on-Dunsmore and Wolston.
Issue	GP surgery and pharmacy are accessed via congested unlit narrow lane with no pavement posing risk to pedestrians and drivers - this point has not been addressed since Reg 18
Who raised the issue	Brinklow Residents
No. raising the issue	269
Council response	The Local Plan cannot address existing challenges. The proximity of the allocation site to the GP surgery means it is unlikely to result in a substantial increase in patients visiting the GP surgery and pharmacy by private vehicle.
Issue	No substantive need for self-build plots in Brinklow, alternative access arrangements from Rugby Road, and excluding the eastern part of the site unsound - ridge and furrow should not be prioritised. Eastern parcel would be removed from green belt without contributing to housing need.
Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	The self-build register contains many entrants which specify only 'village' or 'anywhere' and this site is considered suitable for meeting this demand. Avoiding development on the eastern parcel not only protects the ridge and furrow but also minimise harms to the setting of the scheduled monument and conservation area. This approach is supported by the Heritage Assessment (SS19).

4.24. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications

proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
A new Water Cycle Study should be completed to look at the Flow Rate & Volume of Smite Brook & effects on Coombe Pools SSSI	Whiteford, James
Amend development requirements to allow development on the eastern parcel with proportionate recording of ridge and furrow. (Also access and self-build revisions).	William Davis Homes (site 315)
Amend development requirements to ensure evaluative archaeology fieldwork assessment is undertaken and to avoid any damage to ridge and furrow during construction	Brinklow Residents
Add development requirement to protect historic assets of the site and heritage of Brinklow	Brinklow Residents
Add requirement for pedestrian crossing on Broad Street	Brinklow Residents
Add requirement to improve local public transport including public buses during school transport hours and routes to Rugby and Coventry train stations	Brinklow Residents
Council response to modification proposals: The current development requirements are designed to ensure development is sympathetic to the heritage considerations at this site, including the ridge and furrow. The contributions to traffic infrastructure or local services listed are not exhaustive and other measures may be required at application stage, alongside further assessment.	

SITE 129 LAND NORTH OF LILBOURNE ROAD, CLIFTON UPON DUNSMORE

4.25. Four representations on behalf of four people or organisations argued that the allocation of site 129 is unsound. Three representations on behalf of three people or organisations argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Not enough school places at the village school to accommodate new homes
Who raised the issue	Adams, Lee
No. raising the issue	1
Council response	The total quantum of development at Clifton has been limited to the projected future capacity of the primary school. The Education Topic Paper (I11) concludes that while places at Clifton upon Dunsmore school are limited, the school only drew 45-46% of children from its priority area of Clifton, Newton and Churchover ward in 2022/23 and 2024/25. The remainder primarily came from the Rugby urban area. There is sufficient space in nearby Rugby schools to accommodate children living outside the Clifton priority area. Therefore, the impact of the site allocation on school places would be to increase the number of children attending from within the priority area.

Issue	Road infrastructure not suitable, concern about junction with A5 and flooding on the road
Who	Adams, Lee; Maycock, Amy; Clifton upon Dunsmore Parish Council

raised the issue	
No. raising the issue	3
Council response	The Local Plan cannot address existing infrastructure issues. The Strategic Transport Assessment (I3) did not identify any schemes required to mitigate the impacts of this development specifically, however the need for smaller site-specific measures would be assessed by the local highways authority at planning application stage.

Issue	Site is in an unsustainable location requiring car travel for most services (Maycock, Amy) / less sustainably located for recreation ground and bus stops than other candidate sites (Richborough)
Who raised the issue	Maycock, Amy; Richborough (Clifton upon Dunsmore)
No. raising the issue	2
Council response	Clifton scores well in the Rural Sustainability Study (SD14) with a primary school, shop and pub within the village. The site is approximately 400 metres from the nearest bus stop, village stores and public house. It is approx. 600 metres from the primary school and 700 metres from the recreation ground. It has reasonable potential for non-car modes of travel to access Rugby town centre and easy access to local leisure facilities.

Issue	Loss of quality agricultural land, trees and hedgerows contrary to national policy and insufficient assessment/evidence on impact
Who raised the issue	Maycock, Amy
No. raising the issue	1
Council response	The site is a grade 2 agricultural land which is considered Best and Most Versatile. However, its non-Green Belt location with good access to village services and to the Rugby urban area is thought to justify the allocation. The development requirements refer to the retention and enhancement of hedgerows and green buffers. The site did not meet the threshold for an ecological constrain assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. Further site-specific ecological assessment would be required at application stage.

Issue	Heritage impact on Old Hall and Clifton Manor and Conservation Area
Who raised the issue	Clifton upon Dunsmore Parish Council; Richborough (Clifton upon Dunsmore)
No.	2

raising the issue	
Council response	The site was subject to a heritage assessment (SS19) which noted the heritage constraints and the need for high quality design, low number of units, and additional screening to mitigate the heritage impacts. These have been included in the development requirements.

Issue	Landscape impact, site is beyond a well treed edge to village with a network of public rights of way. Would be visually prominent
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	This site is considered to have lower landscape impacts than other candidate sites around Clifton upon Dunsmore and has an overall rating of Medium/Low in the Landscape Sensitivity Assessment of smaller sites (SS22). It sits within a well-enclosed parcel and has a strong relationship with the existing built area of the village

Issue	Development would lead to traffic flows through the village including past the school
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	The relatively low number of units on this site is through to minimise impacts on the local roads. The site is within easy walking distance of the village school so should not contribute to increased drop-off/pick-up congestion. Fastest routes to the strategic road network would not go past the school. The Strategic Transport Assessment (I3) did not identify any significant impacts on the road network from this development.

4.26. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Upgrade required to Lilbourne Road up to and including the A5 junction	Clifton upon Dunsmore Parish Council
Council response to modification proposals: The Strategic Transport Assessment (I3) did not identify this scheme as a requirement for development of the site. The proposal will be subject to further highways assessments at application stage which will consider the need for more localised measures including on Lilbourne Road.	

SITE 202 NEWTON ROAD, CLIFTON UPON DUNSMORE

4.27. Four representations on behalf of four people or organisations argued that the allocation of site 202 is unsound. Two representations on behalf of two people or organisations argued that the allocation of site 202 is sound. The following main issues were raised with this site allocation:

Issue	Not enough school places at the village school to accommodate new homes
Who raised the issue	Adams, Helen
No. raising the issue	1
Council response	The total quantum of development at Clifton has been limited to the projected future capacity of the primary school. The Education Topic Paper (I11) concludes that while places at Clifton upon Dunsmore school are limited, the school only drew 45-46% of children from its priority area of Clifton, Newton and Churchover ward in 2022/23 and 2024/25. The remainder primarily came from the Rugby urban area. There is sufficient space in nearby Rugby schools to accommodate children living outside the Clifton priority area. Therefore, the impact of the site allocation on school places would be to increase the number of children attending from within the priority area.

Issue	Road infrastructure is not suitable
Who raised the issue	Adams, Helen; Maycock, Amy
No. raising the issue	2
Council response	The Local Plan cannot address existing infrastructure issues. The Strategic Transport Assessment (I3) did not identify any schemes required to mitigate the impacts of this development specifically, however the need for smaller site-specific measures would be assessed by the local highways authority at planning application stage.

Issue	Concern for increased flood risk
Who raised the issue	Adams, Helen
No. raising the issue	1
Council response	The Level 2 Strategic Flood Risk Assessment (SS9) and Sequential Test (SS14) found the site to be at low risk of flooding with no anticipated increase in flood risk elsewhere. Further site-specific flood risk assessments will be required at planning application stage.

Issue	Site is in an unsustainable location requiring car travel for most services (Maycock, Amy) / less sustainably located for recreation ground and bus stops than other candidate sites
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	(Richborough)
Who raised the issue	Maycock, Amy; Richborough (Clifton upon Dunsmore)
No. raising the issue	2
Council response	Clifton scores well in the Rural Sustainability Study (SD14) with a primary school, shop and pub within the village. The site is approximately 0.2-0.3 miles from the nearest bus stop and 0.4 miles from the recreation ground, giving it reasonable potential for non-car modes of travel to access Rugby town centre and easy access to local leisure facilities.

Issue	Development will harm the adjacent Clifton conservation area
Who raised the issue	Maycock, Amy; Richborough (Clifton upon Dunsmore)
No. raising the issue	2
Council response	The site is largely separated from the conservation area by other modern development and is not considered to present any harms to its setting

Issue	Development would lead to traffic flows through the village including past the school
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	The relatively low number of units on this site is through to minimise impacts on the local roads. The site is within easy walking distance of the village school so should not contribute to increased drop-off/pick-up congestion. Fastest routes to the strategic road network would not go past the school. The Strategic Transport Assessment (I3) did not identify any significant impacts on the road network from this development, however the need for smaller site-specific measures would be assessed by the local highways authority at planning application stage.

Issue	Potential landscape impacts – the site is not well enclosed, and development will be visually prominent including visibility from pRoWs
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	This site is considered to have lower landscape impacts than other candidate sites around Clifton upon Dunsmore and has an overall rating of Medium/Low in the Landscape

	Sensitivity Assessment for smaller sites (SS22). The site is felt to be quite well-enclosed and has a strong relationship with the existing built area of the village.
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4.28. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Seek bungalows within the proposal in line with emerging Neighbourhood Plan	Clifton upon Dunsmore Parish Council
Council response to modification proposals: This site is considered more suitable for a combination of market-rate and affordable two-storey/non-bungalow housing typologies. The Neighbourhood Plan is not yet made and was in early stages during much of the plan making process.	

SITE 307 NORTH ROAD, CLIFTON UPON DUNSMORE

4.29. Six representations on behalf of six people or organisations argued that the allocation of site 307 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Consideration is to be given to the proposed access design in respect of the existing adjacent neighbouring bungalow’s driveway
Who raised the issue	Warwickshire County Council; Dignan, Lynn
No. raising the issue	2
Council response	Noted. Consideration of the details of the proposed access design would take place at planning application stage.

Issue	North road and access point are too narrow, site access would need to cross existing property (representation from owner), and road is blocked by parked vehicles. Particular concern raised about disruption during construction phase. Frequent traffic associated with the school with high risk of collisions.
Who raised the issue	Clifton upon Dunsmore Parish Council; Plummer, Dominic; Dignan, Lynn; Dignan, Peter
No. raising the issue	4
Council response	The Strategic Transport Assessment (I3) did not identify any significant issues arising from this site allocation. A site specific transport assessment and further details of the site access strategy will be required at planning application stage. Construction proposals would be subject to a construction management plan to be agreed at application stage. The proximity of the site to the school would avoid an increase in school run traffic

	associated with the site.
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Issue	Site is farther from bus stop and recreation ground than alternative sites
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	The site is approximately 0.2 miles from the nearest bus stop and 0.3 miles from the recreation ground making it well-located to access these facilities.

Issue	Development would lead to traffic flows through the village including past the school
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	The low number of units on this site is thought to minimise impacts on the local roads. The site is within easy walking distance of the village school so should not contribute to increased drop-off/pick-up congestion. Fastest routes to the strategic road network would not go past the school. The Strategic Transport Assessment (I3) did not identify any significant impacts on the road network from this development.

Issue	Landscape impact. Elevated site, prominent and visible from PROWs, with distant views and weak field boundaries
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	This site is considered to have lower landscape impacts than other candidate sites around Clifton upon Dunsmore and has an overall rating of Medium/Low in the Landscape Sensitivity Assessment for smaller sites (SS22). The site has minimal landscape value. The only sensitivities are likely to be due to its views of Rugby town to the northwest, its proximity to residential dwellings which have some intervisibility, and the current tranquillity of the area.

Issue	This is just part of land so likely that it will increase in numbers as the developer decides to build more
Who raised the issue	RBC Conservative Group
No. raising the issue	16

Council response	The allocation would limit the developer to the red line boundary shown in the site allocations annex. Any further development would be subject to a full planning application and treated as a speculative proposal. A separation area is included in the plan under Policy EN4 which would prevent further expansion of this site.
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Issue	Highway widening that would be required would cause significant harm to the rural character of the village entrance
Who raised the issue	Dignan, Peter
No. raising the issue	1
Council response	Specific proposals for site access and associated highways works would be considered at application stage. Highway widening at the village entrance is not envisaged.

Issue	Allocation is unjustified because it is undermined by the evidence that supports policy EN4. Proposing both this allocation and policy EN4 is irrational.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The council disagrees. The proposed allocation could be viewed as “rounding off” of Clifton upon Dunsmore extending no closer to Rugby than the North Road allotments. This small allocation does not undermine the evidence for a separation area between Rugby and Clifton upon Dunsmore.

4.30. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Road safety audit should be carried out to assess entry point to site	Plummer, Dominic
Council response to modification proposals: The local highways authority will consider the site’s access and layout once the detail proposals are available at point of application.	

SITE 172 ELIZABETH WAY, LONG LAWFORD

4.31. Two representations on behalf of 517 people or organisations argued that the allocation of site 172 is unsound. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing
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Who raised the issue	Farmer, Antony; Long Lawford Residents
No. raising the issue	517
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highway authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4.

Issue	Brownfield land should be used instead of Green Belt land
Who raised the issue	Farmer, Antony
No. raising the issue	1
Council response	This is a brownfield site.

Issue	Garages are currently used by local residents
Who raised the issue	Long Lawford Residents
No. raising the issue	516
Council response	The Council's Garage Management Plan, approved by cabinet in September 2025 agreed to rationalise some underused garage sites, including this site which was considered suitable for residential development as a brownfield site. At the time of the report the Elizabeth Way garages had an occupancy rate of less than 50%.

SITE 316 LAND AT LONG LAWFORD

4.32. 14 representations on behalf of 529 people or organisations argued that the allocation of site 316 is unsound. The following main issues were raised with this site allocation:

Issue	Runoff of water from site if developed will add to flooding of A428 and Livingstone Avenue green area (balance ponds not sufficient to mitigate this)
Who raised the issue	Long Lawford Parish Council; Skinner, Gary; Livingstone Avenue Householders Ltd; Long Lawford Residents; Walker, Rebecca
No.	520

raising the issue	
Council response	A detailed site summary table was prepared as part of the Level 2 Strategic Flood Risk Assessment (SS13) for this site which concluded it could be made safe for its lifetime of 100 years and made recommendations for drainage and mitigation strategies. Development will be subject to a site-specific flood risk assessment at application stage which must demonstrate the development will not increase flood risk elsewhere.

Issue	Traffic - Increased traffic on A428 will make leaving & entering village more difficult at peak times. Children from site being taken to village school by car will exacerbate parking issues there.
Who raised the issue	Long Lawford Parish Council; Skinner, Matthew; Evans, Roger; Eaton, David; Brandon & Bretford Parish Council; Skinner, Gary; Long Lawford Residents; Walker, Rebecca
No. raising the issue	523
Council response	The Strategic Transport Assessment (I3) did not identify significant issues on the A428 but did highlight a requirement for the development to contribute to other road improvement schemes to mitigate traffic impacts including the A4071 Potsford Dam Roundabout scheme (by 2038), the A426/Newton Manor Lane scheme (by 2042) and the A4071/B4112 Newbold Road Roundabout scheme (by 2042). These are set out in the Infrastructure Delivery Schedule (I2). Further, site-specific mitigations would be considered at planning application stage.

Issue	Noise & disruption caused by development of site
Who raised the issue	Long Lawford Parish Council
No. raising the issue	1
Council response	All development proposals will be subject to a construction management plan once planning permission is granted.

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing
Who raised the issue	Farmer, Antony; Skinner, Matthew; Eaton, David; Skinner, Gary
No. raising the issue	5
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Card Board (NHS) and Severn Trent Water. The scale of development is considered to be commensurate with the level of services

	<p>within Long Lawford (e.g. school capacity) and those available a short distance away in Rugby town. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4.</p> <p>The education topic paper (document I11) identified sufficient school capacity to accommodate the proposed development.</p>
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Issue	Release of Green Belt land not justified. Brownfield/non-Green Belt should be prioritised. Would not meet requirements of NPPF para 149e) & f)
Who raised the issue	Farmer, Antony; Whitford, Gemma; Evans, Roger; Eaton, David; Long Lawford Residents; Miller Homes
No. raising the issue	521
Council response	<p>The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning and justification for allocating sites within the Green Belt. This site was considered to be suitable for allocation for reasons including supporting the sustainability of the village primary school, delivery of new public recreational facilities, lower assessed landscape sensitivity of the site, and proximity to Rugby urban area.</p> <p>The council believes that it can demonstrate the updates to the Green Belt boundaries will not need to be altered again at the end of the plan period (NPPF 149e) and that the edge of the new development and associated recreational land use (which is a permitted green belt use) will serve as a clear and permanent boundary (NPPF 149f). The development principles plan and the requirements of the development sites annex would ensure delivery of a strong new Green Belt boundary.</p>

Issue	Disproportionate with the settlement hierarchy and of unjustified scale
Who raised the issue	Whitford, Gemma; Long Lawford Residents
No. raising the issue	517
Council response	Long Lawford is the largest of the main rural settlements by some margin with a population of 4370 according to the ONS Census 2021 built up area statistics. It also scored well in the rural sustainability study (SD14) ranking 5 th . And has among the best transport links to Rugby, both for public transport and for (with improvements) walking and cycling. Allocating the largest quantum of development outside the urban area to this village is therefore felt to be an appropriate strategy justified by proportionate evidence.

Issue	Sequential test for flood risk has not been robustly applied according to NPPF 159-162
Who raised the issue	Whitford, Gemma

No. raising the issue	1
Council response	The site was subject to the sequential test (SS14), and a site summary table (SS13) was produced to assess flood risk in further detail. The representation does not specify in what way the sequential test has not been robustly applied and the NPPF paragraph referenced does not relate to the sequential test or flood risk.

Issue	Long Lawford has already experienced large-scale growth and cannot accommodate any more
Who raised the issue	Long Lawford Residents
No. raising the issue	516
Council response	It is acknowledged that Long Lawford has experienced multiple development schemes over the previous decades. Nonetheless, it remains a sustainable location for further development and the evidence concludes that key services such as the primary school (Education Topic Paper I11) are projected to have sufficient capacity to accommodate further growth.

Issue	Three of the development requirements are too rigid and could prevent the policy being applied effectively
Who raised the issue	Richborough (Long Lawford)
No. raising the issue	1
Council response	We disagree. The development requirements are designed to ensure high quality, sustainable development outcomes at this site.

Issue	Viability less in Long Lawford than other rural areas so may not deliver higher affordable housing level.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	No issues with delivering a policy-compliant level of affordable housing have been highlighted in the evidence base.

Issue	Site is in the green belt and would join Long Lawford to Rugby, which in turn would reduce the distance between Rugby & Coventry, which is contrary to intention of green belt
Who raised	RBC Conservative Group

the issue	
No. raising the issue	16
Council response	<p>The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning and justification for allocating sites within the Green Belt. This site was considered to be suitable for allocation for reasons including supporting the sustainability of the village primary school, delivery of new public recreational facilities, lower assessed landscape sensitivity of the site, and proximity to Rugby urban area.</p> <p>The Stage 2 Green Belt Study GBD2 identifies the site as making weak/no contribution to preventing Rugby and Coventry from merging because of the robust almost 10km gap between the two towns.</p>

Issue	Site is next to Long Lawford Meadows Local Wildlife Site and directly on Lawford Heath Meadows - this is a key wildlife site home to a number of important and at risk protected species. Councils NERC duty isn't being met
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	<p>Long Lawford Meadows is a former local wildlife site that was subsequently developed for housing. This area is now a housing estate not a local wildlife site.</p> <p>Lawford Heath Meadows is a potential local wildlife site. This site does not overlap with the site boundary and there is limited adjacency. A potential local wildlife site is a site that has not yet been surveyed or assessed to determine whether it meets the threshold to be designated as a local wildlife site.</p> <p>Accordingly there are no currently extant local wildlife sites close to this proposed allocation.</p>

4.33. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend second development requirement to only require retention and reuse of the L-shaped building where viable	Richborough (Long Lawford)
Amend sixth development requirement to only require connections with off-site public rights of way where possible	Richborough (Long Lawford)
Amend eighth development requirement to only require small-scale convenience retail and community space where viable	Richborough (Long Lawford)

Council response to modification proposals: The development requirements are designed to ensure a high-quality and sustainable outcome at this site. Allowing too much flexibility in the requirements risks reducing the quality, sustainability and delivery of additional amenities or connections.
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SITE 253 LAWFORD FIELDS FARM, LONG LAWFORD

4.34. 17 representations on behalf of 532 people or organisations argued that the allocation of site 253 is unsound. Two representations on behalf of two people or organisations argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Issues with traffic and congestion
Who raised the issue	Long Lawford Parish Council; Skinner, Matthew; Evans, Roger; Brandon & Bretford Parish Council; Skinner, Gary; Long Lawford Residents; Walker, Rebecca
No. raising the issue	522
Council response	The Strategic Transport Assessment (I3) identified contributions would be required from the development of this site to support the A4071 Potsford Dam Roundabout scheme (by 2038) and the A4071/B4112 Newbold Road Roundabout scheme (by 2042) and to mitigate any transport impacts arising. These are set out in the Infrastructure Delivery Schedule (I2). The Local Plan cannot address existing infrastructure issues.

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. The site is disconnected from the village services.
Who raised the issue	Farmer, Antony; Skinner, Gary; Pickup, Maralyn; Long Lawford Residents; Walker, Rebecca; Oag, Hazel
No. raising the issue	521
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. The site is still within reasonable walking distance of village services, and the development requirements include safe crossing provision on Rugby Road. The education topic paper (document I11) identified sufficient school capacity to accommodate the proposed development.

Issue	Use of Green Belt land is inappropriate and unjustified
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Who raised the issue	Farmer, Antony; Scott, Brett; Evans, Roger; Tarrant, John; Bradshaw, Philip; Pickup, Maralyn; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Long Lawford Residents ; Bradshaw, Naomi; Kang, Jane; Critchley, P; Walker, Rebecca; Oag, Hazel; Allanach, Richard
No. raising the issue	532
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning and justification for allocating sites within the Green Belt. This site was considered to be suitable for allocation for reasons including supporting the sustainability of the village primary school, delivery of new public recreational facilities, lower assessed landscape sensitivity of the site, and proximity to Rugby urban area.

Issue	Site is best and most versatile agricultural land with long history of agricultural use
Who raised the issue	Scott, Brett
No. raising the issue	1
Council response	The site is grade 3 agricultural land so is not considered best and most versatile.

Issue	Reasonable non-Green Belt alternatives (e.g. Reg 18 sites at Dunchurch) are not being prioritised, contrary to national policy
Who raised the issue	Scott, Brett; Tarrant, John; Mr and Mrs Wheeler the landowner of Land west of Medda Place
No. raising the issue	4
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning and justification for allocating sites within the Green Belt and assesses non-green belt alternatives, including those at Dunchurch. It concludes that Dunchurch is not a preferable location for development due to the scale of development already planned at the village (240 homes) and immediately adjacent to the village (the remainder of the 4000 homes) as part of South West Rugby SUE and significant overconcentration of development at this main rural settlement would not represent a sustainable pattern of the development.

Issue	Loss of separation between Rugby and Long Lawford, undermines the purpose of the Green Belt in limiting urban sprawl. Would not meet requirements of NPPF para 149e) & f)
Who raised the issue	Scott, Brett; Evans, Roger; Tarrant, John; Pickup, Maralyn; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Long Lawford Residents; Bradshaw, Naomi; Kang, Jane; Critchley, P; Walker, Rebecca; Miller Homes; RBC Conservative Group; Allanach, Richard

No. raising the issue	546
Council response	It is true that the separation between Rugby and Long Lawford will be reduced by this allocation. The council believes that it can demonstrate the updates to the Green Belt boundaries will not need to be altered again at the end of the plan period (NPPF 149e) and that the edge of the new development and associated recreational land use (which is a permitted green belt use) will serve as a clear and permanent boundary (NPPF 149f). The development principles plan and the requirements of the development sites annex would ensure delivery of a strong new Green Belt boundary.

Issue	Environmental impact - large number of different wildlife species around site, including 2 protected species of bat
Who raised the issue	Evans, Roger; Walker, Rebecca; Oag, Hazel
No. raising the issue	3
Council response	The site did not meet the threshold for an ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. A site-specific ecology survey and protected species investigations would be handled at application stage.

Issue	Previous SA found the site to be a lower performing option due to the contribution to Green Belt purposes and the lack of justification for this scale of development at Long Lawford
Who raised the issue	Bradshaw, Naomi; Allanach, Richard
No. raising the issue	2
Council response	<p>This is understood to be a reference to the interim Sustainability Appraisal report. This was prepared at an earlier stage of plan-making and was updated for the final SA report based on updated evidence and responses to the Regulation 18 consultation.</p> <p>The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning and justification for allocating sites within the Green Belt. It is true that the Interim SA did not progress this site as a growth scenario due to being lower performing than site 316. However, it did also note that development of 316 would likely increase pressure for future allocation of this site. The Regulation 19 SA (CD5) highlights that the current approach ensures both sites are brought forward comprehensively, rather than resulting in piecemeal development.</p>

Issue	Exacerbation of existing flood risk in Long Lawford, in particular around Livingstone Avenue and South View Road
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Who raised the issue	Livingstone Avenue Householders Ltd; Long Lawford Residents; Walker, Rebecca; Oag, Hazel
No. raising the issue	519
Council response	The Level 2 Strategic Flood Assessment and Sequential Test found the site to be at low risk of flooding with no anticipated increase in flood risk elsewhere. Further site-specific flood risk assessments will be required at planning application stage.

Issue	Viability is lower in Long Lawford than other rural areas so allocation may not deliver higher affordable housing level
Who raised the issue	Miller Homes
No. raising the issue	426
Council response	No issues with delivering a policy-compliant level of affordable housing have been highlighted in the evidence base.

Issue	The allocation is inconsistent with NPPF para 96 because the A428 will prevent social interaction with the village core to the north
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	We disagree. The development requirements include a pedestrian crossing on Rugby Road (A428) to ensure reasonable pedestrian routes to and from the rest of the village. It is expected there will be opportunities for social interaction across the village through routes to the village school from the allocation site, and through existing village residents accessing the recreational facilities at the southern edge of the allocation site. Additionally, a new shop and community space is required as part of the neighbouring Land at Long Lawford site allocation.

Issue	The evidence points to a need for an active travel connection to Bilton School via Bilton Lane, not along the line of PRow R126 to Henry Hinde School.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The development requirements include a safe walking and cycling route from the site to both Henry Hinde Junior School and Bilton School. This must include a controlled crossing point or bridge over the A4071. The development principles plan provides an

indicative alignment for this. However, if it is demonstrated that a route on Bilton Lane is preferable this could equally meet the requirements of the policy.

4.35. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Following consultation with WCC archaeologist, modifications may be needed to maximise preservation of the Ridge and Furrow on site	Historic England
Consider how site could deliver safe walking and cycling route to schools in Bilton via Bilton Lane corridor	Warwickshire County Council
Site needs to incorporate high-quality walking, wheeling and cycling infrastructure and provide safe connection to existing and planned routes on A428	Warwickshire County Council
All of site should be removed from Green Belt so that development of southern part of site as open space is not unduly restricted (e.g. buildings needed as changing rooms or equipment storage).	Tritax Park Rugby West Limited
2nd dev requirement is too prescriptive. It should specify that a safe walking route shall be created but not state that a controlled crossing point or bridge over the A4071 is necessary.	Tritax Park Rugby West Limited
Landscape edge along Rugby Rd shown in diagram should be removed - it contradicts 4th dev requirement for built frontage along Rugby Rd.	Tritax Park Rugby West Limited
5th dev requirement for useable and attractive space above pipeline should be amended to state that this is "subject to the utility provider's requirements".	Tritax Park Rugby West Limited
Dev requirements 8, 9 and 10 should be amalgamated into a reworded 2nd dev requirement that encompasses all transport requirements and specifies that they are subject to agreement with the Highway Authority.	Tritax Park Rugby West Limited
Change the development requirement for a “pedestrian crossing” to a “controlled pedestrian crossing”.	Allanach, Richard
<p>Council response to modification proposals: The current development requirements are designed to ensure a high-quality and sustainable outcome at this site. Adding greater flexibility risks a poorer scheme being delivered, while being too prescriptive can place an unreasonable burden on developers and risks the site not coming forward. We believe the current approach has the right balance.</p> <p>In relation to the need for consultation with the archaeologist, this would happen at planning application stage.</p> <p>In relation to incorporating high-quality walking and cycling infrastructure on-site this is adequately covered by policy I1 Transport and national policy. Walking and cycling routes on the A428 are already referenced in the policy.</p> <p>The policy on delivering a walking and cycling route to Bilton would allow this to be delivered on Bilton</p>	

Lane if this is shown to be the best solution.

Outward facing built frontage on Rugby Road can be delivered behind the green edge, there is no inconsistency. That green edge would ensure consistency on Bilton Lane with the neighbouring development site 316.

SITE 87 HILLCREST FARM, NEWTON

4.36. Five representations on behalf of five people or organisations argued that the allocation of site 87 is unsound. Three representations on behalf of three people or organisations argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Site is not in a sustainable location which is in contradiction with national policy.
Who raised the issue	Tarrant, John; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Kang, Jane; Critchley, P
No. raising the issue	7
Council response	This is a small-scale brownfield site/disused farm building development which is therefore felt to be a sustainable option for Newton. While there are limited facilities directly within the village, the site is close to services in Coton Park and Brownsover.

Issue	Safe walking routes to schools are not available, which makes the allocation in contradiction with national policy.
Who raised the issue	Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Kang, Jane; Critchley, P
No. raising the issue	8
Council response	The development requirements include upgrades to walking and cycling routes which will connect to schools in Coton Park and Brownsover. Those routes will be improved through the developments at Coton Park East (site 64) and Newton Manor Lane (site 54).

Issue	Development should come forward as windfall or identified in the emerging neighbourhood plan
Who raised the issue	Bilton Grange School
No. raising the issue	1
Council response	The site is allocated in the local plan to reduce the risk of the site not coming forward for development and to ensure sustainable and high-quality development outcomes are achieved. The Newton and Biggin Neighbourhood Plan is still ongoing and does not intend to allocate any sites.

Issue	Access onto Newton Lane as proposed in Masterplan Option B would be unsafe. Access should be directly opposite the Leys or via Hollies Road.
Who raised the issue	Harris, Andrew
No. raising the issue	1
Council response	There are not considered to be impediments to delivering safe access to the site. Detailed access arrangements would be considered at planning application stage.

4.37. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Require that vehicular access be directly opposite the Leys or via the Hollies.	Harris, Andrew
Additional land is available at the Hillcrest Farm site for larger allocation	Newton LDP
A development requirement should be added to ensure that the existing roadside boundary hedge and trees are retained and strengthened, and any footpath should be set behind them rather than adjacent to carriageway	Davis, Ian; O'Connell, Mark
It should be made a development requirement that this hedgerow and trees be retained, protected and strengthened and that any footpath should be on its development side to ensure its retention and in the interests of visual amenity and ecology	O'Connell, Mark
Planting around the site should mask the new buildings and maintain the rural aspect from Great Central Walk towards Newton	O'Connell, Mark
<p>Council response to modification proposals: Detailed access arrangements can be determined at planning application stage Given Newton is a small village, it is not considered that a larger site allocation is justified. In relation to retention and strengthening of boundary hedges and planting on the western boundary, the council does not consider that modifications are necessary to address issues of soundness, however, would not object to such modifications if considered to be necessary by the inspector(s).</p>	

SITE 353 TOWN HALL, RUGBY

4.38. One representation on behalf of one person or organisation argued that the allocation of site 353 is unsound. The following main issues were raised with this site allocation:

Issue	Site does not have a heritage assessment and is therefore not underpinned by current evidence nor is justified
Who raised the issue	Historic England
No.	317

raising the issue	
Council response	A heritage assessment has been produced and is submitted as document SS29.

Issue	Allocation is for 43 fewer dwellings than its capacity as advised by the Urban Capacity Study, this sub-optimal use of brownfield land is inconsistent with national policy.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The site allocation figure is based on preliminary site layout drawings, as opposed to the generic formula used in the Urban Capacity Study (SS6 and SS7) and is designed to provide high quality housing, while ensuring deliverability.

4.39. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend the site boundary to that assessed in the Urban Capacity Study and allocate the site for 157 dwellings, not 114.	Allanach, Richard
Council response to modification proposals: The issue of allocated units is addressed above in the main issues. The site boundary has been amended from that in the Urban Capacity Study to retain the community facility Benn Hall, Newbold Road car park and the heritage buildings. Only the Town Hall building itself and parking to the front and west are to be redeveloped as part of this site.	

SITE 283 RUGBY CENTRAL SHOPPING CENTRE, RUGBY

4.40. One representation on behalf of one person or organisation argued that the allocation of site 283 is unsound. The following main issues were raised with this site allocation:

Issue	Site does not have a heritage assessment and is therefore not underpinned by current evidence nor is justified. Historic England raised concerns at applications in 2022 and 2023.
Who raised the issue	Historic England
No. raising the issue	1
Council response	The site already has planning permission (R22/0657) so further heritage assessment was not considered necessary for the purposes of the plan allocation. This is addressed in the

draft Statement of Common Ground with Historic England (document SOCG10).

SITE 350 ROUNDS GARDENS, RUGBY

4.41. One representation on behalf of 134 people or organisations argued that the allocation of site 350 is sound. The following main issues were raised with this site allocation:

Issue	Support the allocation but prefer it to be reduced (and green space increased) and resist any increase in the allocation. Make the case for securing green space benefit in an area of deficit.
Who raised the issue	Save Rounds Gardens (New Bilton Community Association)
No. raising the issue	134
Council response	We consider the current allocation figure to strike the right balance between making efficient use of this sustainable site and ensuring high-quality housing and adequate amenity space is delivered.

Issue	Allocation is for 5 fewer dwellings than recommended by Urban Capacity Study and represents sub-optimal use of land which is contrary to national policy.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	We consider the current allocation figure to strike the right balance between making efficient use of this sustainable site and ensuring high-quality housing and adequate amenity space is delivered. The allocation figure is based on preliminary site layout drawings, as opposed to the generic formula used in the Urban Capacity Study (SS6 and SS7). The lower figure is therefore a more realistic assessment of capacity.

4.42. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Allocation should be reduced with more green space provision - address area of deficit	Save Rounds Gardens (New Bilton Community Association)
Change from 70 units to 120 units - delivered in line with Biart Place/Navigation Way	RBC Conservative Group
Allocate the site for 75 units, not 70, as recommended by the Urban Capacity Study.	Allanach, Richard
Council response to modification proposals: The Council believes the current allocation figure strikes	

the right balance between making efficient use of this sustainable site and ensuring high-quality housing and adequate amenity space is delivered. The figure is based on preliminary site layout drawings. The site is close to Caldicott Park offering additional public open space.

SITE 351 NORTH OF ROUNDS GARDENS, RUGBY

4.43. One representation on behalf of one person or organisation argued that the allocation of site 351 is unsound. The following main issues were raised with this site allocation:

Issue	Site is a potential Local Wildlife Site so should not have passed housing site assessment or Sustainability Appraisal assessment
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	A potential Local Wildlife Site has not been surveyed or assessed to determine whether or not it meets the criteria for designation as a local wildlife site. The site was recently the subject of a s78 appeal decision in respect of a proposal for a more intensive development of the site which was dismissed but the reasons for dismissing the proposal did not include ecology concerns.

4.44. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Clarify that reference to access from Princes Street and Willans Place is in terms of active travel	Warwickshire County Council
Council response to modification proposals: The development requirements plan shows both vehicular and pedestrian access points from Princes Street and Willans Place. The development requirements already state there is to be no east-west route through the site for vehicles.	

SITE 354 92 LOWER HILLMORTON ROAD, RUGBY

4.45. There were no main issues regarding this allocation. There was one recommended modification as shown below.

Modification summary	Proposer(s)
Crossing of Hillmorton Road needed as the footway to the south of the road ends at the rail bridge.	Warwickshire County Council
Council response to modification proposals: Noted that this may be required. Specific highways and access considerations can be addressed at planning application stage and managed through conditions.	

SITE 279 STAGECOACH CAR PARK, RUGBY

4.46. There were no main issues regarding this allocation. There was one recommended modification as shown below.

Modification summary	Proposer(s)
Refer to the Rugby Railway Station/Town Centre Active Travel Zone and potential LCWIP improvements in the development requirements for consistency with other proposed town centre sites	Warwickshire County Council
Council response to modification proposals: Not all town centre sites explicitly refer to this in the development requirements. This does not preclude the site from contributing to these schemes.	

SITE 153 WESTWAY CAR PARK, RUGBY

4.47. The following main issues were raised with this site allocation:

Issue	Site is only allocated for 24 units despite the UCS specifying that it could accommodate 38 units - inconsistent with national policy re: optimal use of land
Who raised the issue	Eaton, David; Allanach, Richard
No. raising the issue	2
Council response	The site allocation figure is based on preliminary site layout drawings, as opposed to the generic formula used in the UCS (SS6 and SS7) and is designed to provide high quality housing, while ensuring deliverability. The site layout drawings provide a more realistic assessment of site capacity.

4.48. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Allocate the site for 38 units, not 24.	Allanach, Richard
Council response to modification proposals: Please see council response to this main issue above.	

SITE 338 LAND SOUTH OF CRICK ROAD, HOULTON

4.49. Two representations on behalf of two people or organisations argued that the allocation of site 338 is unsound. One representation on behalf of 298 people or organisations argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Red line boundary in the policy text doesn't match the proposals map
Who raised	Urban & Civic

the issue	
No. raising the issue	1
Council response	Noted. Correcting this is identified as a suggested additional modification in document CD20.

Issue	Houlton outline planning permission already makes provision for pedestrian access to Rugby Parkway station so development requirement for a further connection is unjustified
Who raised the issue	Urban & Civic
No. raising the issue	1
Council response	The development requirements are designed to ensure the site as a residential allocation has good links with the proposed Rugby Parkway station. The outline planning permission did not envisage residential development on this site. Therefore, the development requirement is required.

Issue	Requirement for contributions towards cycle route network improvements are not justified as routes are either within or required as part of the Houlton or DIRFT developments already approved.
Who raised the issue	Urban & Civic
No. raising the issue	1
Council response	The development requirements only state that contributions “may be required” – the details would be considered at application stage and in the drawing up of a S106 agreement.

Issue	Reiterate observations at Reg 18 stage and request that impacts are fully considered and mitigated.
Who raised the issue	West Northamptonshire Council
No. raising the issue	1
Council response	Noted.

Issue	Proposed density is too low - it runs contrary to Council's own guidance for calculating appropriate densities (HELAA) and is inconsistent with national policy re: uplifting of densities in sustainable locations.
Who	Allanach, Richard

raised the issue	
No. raising the issue	1
Council response	Density ratios referenced in the HELAA (SS2) are noted to be used where no other indicative site area information has been submitted. The call for sites submission letter indicated the site was available for development of c.250 units. This equates to a gross density of 40 dwellings per hectare and assuming crudely a 75% developable area (it may be lower) a net density of 53dph. At 60% net developable area the density would be 67dph. This density is not too low.

4.50. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Remove requirement for pedestrian access to Rugby Parkway	Urban & Civic
Remove requirement for contributions to cycling route schemes	Urban & Civic
Site is directly adjacent to Rainsbrook Valley landscape of elevated sensitivity so would need to be tested early on through a Sustainability Appraisal process	Warwickshire Wildlife Trust
Require the development to meet a minimum density standard of 100 dwellings per hectare	Allanach, Richard
Require cycle (not just pedestrian) access to Rugby Parkway station.	Allanach, Richard
<p>Council response to modification proposals: The current development requirements are designed to ensure a high quality and sustainable development outcome at this site which was originally proposed for employment land under the Houlton outline planning application. The density is as noted above considered appropriate. The site is shown to in the evidence base to have low landscape sensitivity (document SS23).</p> <p>A requirement for cycle as well as pedestrian access to the station is not considered necessary to address an issue of soundness, but the council would not object to this modification were the inspector(s) to wish to make it.</p>	

SITE 59 NEWTON MANOR LANE, BROWNSOVER

4.51. 29 representations on behalf of 558 people or organisations argued that the allocation of site 59 is unsound. Three representations on behalf of four people or organisations argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Loss of separation and separate identities between Rugby and Newton
Who raised the issue	Realf, Peter; Allanach, Richard

No. raising the issue	2
Council response	The site allocation does not fill in the gap between Newton and the Rugby urban edge. The allocation also includes a large new public open space to protect part of the gap between the two boundaries.

Issue	Location requires car travel to access most employment and leisure destinations
Who raised the issue	Marley, Luke; Allanach, Richard
No. raising the issue	2
Council response	This site is within relative proximity and reasonable cycling distance of Rugby town centre with leisure and employment opportunities. There are also nearby bus routes which connect to Rugby train station. It is considered that this site does not have materially worse access to leisure and employment opportunities via non-car modes than other sites on the Rugby urban edge.

Issue	Newton Manor Lane is a dangerous road with no footpath and non-standard cross roads - this danger will be exacerbated by increased traffic from development
Who raised the issue	Marley, Luke; Dixon, Chris; Thursfield, Keith; Fagg, Christopher and Barbara; Edmondson, Elizabeth; Varma, Chaitanya; Newton Manor Lane residents group; Residents of Speedwell Close; Sharma, Nishtha; Devendar, Abhishekh; O'Connell, Mark; Allanach, Richard
No. raising the issue	541
Council response	The development requirements include provision of pedestrian footway and cycle track along Newton Manor Lane, measures to manage the speed of motor traffic on Newton Manor Lane as well as contributions to the A426/Newton Manor Lane scheme identified by the Strategic Transport Assessment (I3) and set out in the Infrastructure Delivery Schedule (I2). It is felt these measures will mitigate any potential road impacts. Further site-specific local interventions including at the St Thomas Cross junction would be considered at the planning application stage.

Issue	Flood risk will be exacerbated in surrounding residential areas - contrary to NPPF & EN7 of this plan
Who raised the issue	Marley, Luke; Thursfield, Keith; Edmondson, Elizabeth; Varma, Chaitanya; Newton Manor Lane residents group; Gupta, Vikas; Residents of Speedwell Close
No. raising the issue	535
Council response	The Strategic Flood Risk Assessment (SS9) included a detailed site summary table (SS11) which made recommendations to ensure the site would be made safe for its lifetime. Development will be dependent on a site-specific flood risk assessment and suitable

	sustainable urban drainage systems (SuDS) which must also demonstrate that there will be no increased risk to other properties.
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Issue	Loss of green space, harms to setting of Great Central Walk and effect on wildlife
Who raised the issue	Marley, Luke; Varma, Chaitanya; Newton Manor Lane residents group; Sharma, Nishtha
No. raising the issue	509
Council response	The site was subject to an ecological constraints assessment (SS25) which concluded the site had the potential to be developed subject to satisfactory mitigations. Specific measures will be assessed at application stage. The development requirements include an appropriate edge including landscape buffer to the Great Central Walk Local Wildlife Site. The site will also include delivery of St Thomas Cross Fields on the eastern portion of the site as public open space.

Issue	Development requirements do not account for the overhead power line
Who raised the issue	National Grid Electricity Distribution
No. raising the issue	1
Council response	An overhead powerline oversales the northern part of the site. There are no pylons on site. This is not considered to be an impediment to the development of the site. This would be handled at application stage when the specific site layout is known. It is anticipated there would be a green corridor under the power lines, as there is further to the west.

Issue	Insufficient infrastructure (schools, doctors, dentists etc) & strained utilities (water, power etc)
Who raised the issue	Edmondson, Elizabeth; Varma, Chaitanya; Newton Manor Lane residents group; Residents of Speedwell Close
No. raising the issue	532
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers such as the local education authority, Integrated Care Board (NHS), local highways authority and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. A two-stage Water Cycle Study has been produced (documents I7-I10) which assesses the impact that future growth, including this allocation, may have on water resources, water supply infrastructure, and wastewater collection and treatment. This concludes

	<p>that "Overall, no issues have been identified that would impede the progress of development sites" and that "any necessary investments or infrastructure planning can be managed through the established procedures over the course of the plan period." Seven Trent Water, the water and sewerage provider for the Borough, have been consulted throughout the plan-making process and will continue to be informed as it progresses so that infrastructure can be appropriately planned.</p> <p>The education topic paper (document I11) does not identify school place constraints to development in this location.</p>
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Issue	Expands development beyond a defensible boundary - gap between Brownsover and Newton was previously considered unsuitable for development and was part of an Area of Restraint at the time of the Warwickshire Structure Plan - impact is still relevant today
Who raised the issue	Realf, Elizabeth; O'Connell, Mark; Allanach, Richard
No. raising the issue	3
Council response	Structure plans have not been in place 2004, and the Warwickshire Structure Plan has been superseded by multiple planning documents since. The site is a sustainable location on the edge of the Rugby urban area and will also deliver public open space. The site will create a new defensible settlement boundary between Brownsover and Newton through designation of a large new public open space at St Thomas Cross junction.

Issue	Alternative use as open space/parkland could deliver community benefit
Who raised the issue	Newton Manor Lane residents group
No. raising the issue	506
Council response	Part of the site, St Thomas Cross Fields, will deliver public open space. The development requirements also include community orchards and allotments which will provide a community benefit. It is not realistic for the entire site to be delivered as public open space as this would likely require a compulsory purchase order by the council.

Issue	Existing vibrations from passing traffic to be exacerbated
Who raised the issue	Newton Manor Lane residents group; Gupta, Vikas; Residents of Speedwell Close
No. raising the issue	531
Council response	All development proposals are subject to a construction management plan once planning permission is granted to minimise disruption from construction traffic.

Issue	Lack of adequate strategic transport modelling for the area
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Who raised the issue	Devendar, Abhishekh
No. raising the issue	1
Council response	The Strategic Transport Assessment (I3) considered the cumulative effects all development proposals, including this site, using advanced transport modelling. It identified a requirement for upgrades to the A426 Leicester Road/Newton Manor Lane Roundabout to mitigate impacts of this site, as set out in the Infrastructure Delivery Schedule (I2).

Issue	Directly adjacent to designated Local Wildlife Site (Coton Park Pool) which is important for biodiversity and legally protected species
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	The site was subject to an ecological constraints assessment (SS25) which concluded the site had the potential to be developed subject to satisfactory mitigations. Specific measures will be assessed at application stage.

Issue	No evidence has been presented to justify increasing the allocation by 45 dwellings between Reg 18 and Reg 19
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The increase in allocation units is based on an updated masterplan submitted by the developer. The council considers that the site can suitably be developed for the proposed number of dwellings while retaining significant green space provision on site.

Issue	No evidence gathered to show that development will not be on best and most versatile farmland
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The site is grade 3 agricultural land which is not Best and Most Versatile.

Issue	Allocation is in Newton & Biggin Parish, Newton is a third-tier settlement and the evidence
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	shows there is no strategic case for allocating at third tier settlements.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	Although the allocation site lies within Newton and Biggin Parish, it is removed from the village of Newton and is adjacent to Brownsover, part of the Rugby Urban Area. It is considered the site is functionally within Brownsover in terms of access to services and is therefore a justified and sustainable location for development.

Issue	St. Thomas Cross junction is unsafe as it is. Development will exacerbate this, yet no mitigation measures are proposed
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The development proposals include measures to slow motor traffic on Newton Manor Lane which will help improve the safety of St Thomas Cross junction. Detailed site-specific transport mitigation can be considered at planning application stage.

Issue	Not having a development requirement to place the required footpath and cycleway on the development side of the hedge on Newton Manor Lane risks it being torn out to make space
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	This is a detailed site design matter that can be considered at planning application stage.

4.52. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Strengthening of development requirements to deliver improvements and safety measures to Newton Manor Lane and St Thomas Cross junction and potentially improve active travel links	Dixon, Chris; Thursfield, Keith; Allanach, Richard
Insert a requirement for the masterplanning of the development to account for the overhead power line, enabling it to remain in situ.	National Grid Electricity Distribution
The dwelling site and open space site should be reversed in order to	O'Connell, Mark

maintain the boundary at Great Central Way and to give access to the open space to new and existing residents	
Existing footpaths and cycle paths should be improved and new public footpaths should be added. A natural buffer should be enforced at Great Central Way to mask buildings and maintain the rural walk.	O'Connell, Mark
Require the development to mitigate safety concerns at St Thomas Cross junction.	Allanach, Richard
Require the development to contribute to a high-quality public transport link to Rugby town centre.	Allanach, Richard
Require the development to ensure an appropriate edge, including landscape buffer, to the stream at the eastern edge of the site.	Allanach, Richard
Require the development to provide a pedestrian footway and cycle track along the development side of Newton Manor Lane's northern hedge, preventing the need for the hedge to be destroyed to provide this facility.	Allanach, Richard
Council response to modification proposals: The current development requirements are designed to ensure a high-quality and sustainable development outcome while also maintaining flexibility at this stage in the process. The details of the site layout and design are yet to be finalised and many of these issues can be addressed at application stage and managed through conditions.	

SITE 100 LAND AT HIGH STREET, RYTON-ON-DUNSMORE

4.53. One representation on behalf of one person or organisation argued that the allocation of site 100 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	This site is designated as Warren Farm Local Wildlife Site, yet the site has not been subjected to an ecological constraints assessment. Without this evidence and appropriate development requirements, the allocation of the site is unjustified and inconsistent with national policy.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	This site was allocated in the Ryton on Dunsmore Neighbourhood Plan. The principle of development has therefore already been established at this site. A recent appeal was dismissed in relation to the site (planning application Ref R22/1120 and PINS ref APP/E3715/W/25/3359147 appeal decision date 27 May 2025). Neither the reasons for refusal nor the reasons for dismissing the appeal included the site's designation as a local wildlife site.

4.54. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Add a development requirement specifying that an ecological appraisal should be undertaken at the outset and all proposals should follow the national policy hierarchy of avoid, mitigate and compensate.	Allanach, Richard
Council response to modification proposals: This is covered by national policy and the validation checklist of the Council for major housing applications (see https://www.rugby.gov.uk/documents/20124/6589626/Validation+Checklist+Feb+2024.pdf/0e5c8781-9b91-e1b7-1a18-f762bd430f97?t=1750866323611)	

SITE 6 LAND EAST OF FOSSE WAY OPPOSITE KNOB HILL, STRETTON-ON-DUNSMORE

4.55. Four representations on behalf of four people or organisations argued that the allocation of site 6 is unsound. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. Unsustainable location due to need to drive to access services.
Who raised the issue	Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Waterworth, Tom
No. raising the issue	7
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. Stretton scored well in the Rural Sustainability Study (SD14) with local access on foot to a primary school, GP surgery, small shop and pub.

Issue	Inclusion of the site is not consistent with the PPG (as described in the HELAA) - sites with capacity for fewer than 5 dwellings should not be allocated
Who raised the issue	Yates, Alan; Allanach, Richard
No. raising the issue	2
Council response	The site is within the Green Belt and has therefore been allocated for development in the Local Plan to ensure it is able to come forward. This is consistent with the council's desire to bring forward a diverse range of different sites.

Issue	Development would increase traffic and exacerbate congestion on the Fosse Way. Visibility at the nearby cross-roads is already poor.
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Who raised the issue	Yates, Alan; Pinchen, Mary
No. raising the issue	2
Council response	This is a small-scale infill development proposal for 3 dwellings which is not expected to create significant impacts on the road network.

Issue	If Green Belt boundary is moved to enable new development there is no further physical feature available to define a clear & permanent boundary to prevent further encroachment on countryside. This does not comply with NPPF.
Who raised the issue	Yates, Alan
No. raising the issue	1
Council response	The site is directly opposite an existing dwelling which will help to create a defined new boundary for the Green Belt, with this allocation functioning more like infill development. There is an existing planting belt and garage business adjacent to the site which remains in the Green Belt, further reinforcing the boundary.

Issue	Location on the outskirts of the settlement with no connecting footway to safely access facilities makes this an unsustainable location for development
Who raised the issue	Mr and Mrs Hudson; Critchley, P
No. raising the issue	3
Council response	Although on the settlement edge, the site is within reasonable walking distance of village services (estimated 6 minutes to the GP surgery and 12 minutes to the primary school) making this a sustainable location within the village. There are already residential dwellings on this stretch of road. The need for upgrades to crossing points or walking routes would be considered at planning application stage.

Issue	Site is unsuitable because part of it lies within Flood Zones 2 and 3.
Who raised the issue	Critchley, P
No. raising the issue	1
Council response	The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) show that 97.9% of the site lies within Flood Zone 1 (low risk of fluvial flooding). There is a more significant risk of surface water flooding which meant the site was subject to further assessment and a site summary table was prepared (SS10) which concluded the site could be made safe for

its lifetime. A site-specific flood risk assessment will be required at application stage.
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4.56. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Concern about lack of footway and recommend need for safe crossing provision as no existing footway	Warwickshire County Council
Require affordable housing to be delivered at the site (if not deleted)	Allanach, Richard
Council response to modification proposals: The allocation is for 3 dwellings and is therefore exempt from policy H2 which only applies to allocations of 10+ units. Specific highways and access considerations can be addressed at application stage.	

SITE 81 LAND WEST OF FOSSE WAY, STRETTON-ON-DUNSMORE

4.57. 8 representations on behalf of 12 people or organisations argued that the allocation of site 81 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. Unsustainable location due to need to drive to access services.
Who raised the issue	Farmer, Antony; Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Waterworth, Tom
No. raising the issue	8
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. Stretton scored well in the Rural Sustainability Study (SD14) with local access on foot to a primary school, GP surgery, small shop and pub.

Issue	Site will cause harm to Green Belt. Brownfield should be used instead of Green Belt land
Who raised the issue	Farmer, Antony; Yates, Alan
No. raising the issue	2
Council	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for

response	allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt.
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Issue	Proposals will cause harm to the existing Brook, damaging ecosystems and local identity/heritage
Who raised the issue	Thompson, Julia
No. raising the issue	1
Council response	The site did not meet the threshold for an ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. A site-specific ecological assessment will be required at application with mitigatory measures required to ensure no adverse impacts on the brook. The area around the brook will deliver a 2.3 hectare public open space which will minimise harms on the brook and associated ecosystems.

Issue	Loss of local wildlife habitats and harm to wildlife during construction
Who raised the issue	Thompson, Julia
No. raising the issue	1
Council response	The site did not meet the threshold for an ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. A site-specific ecological assessment will be required at application with mitigatory measures required to ensure no adverse impacts on local wildlife. The development will be subject to a construction management plan once permission is granted.

Issue	Development would increase traffic and exacerbate congestion on the Fosse Way
Who raised the issue	Yates, Alan; Pinchen, Mary
No. raising the issue	2
Council response	The Strategic Transport Assessment (I3) did not identify significant impacts on the Fosse Way from this development. There may be a requirement for upgrades to Princethorpe Crossroads and Bretford Bridge to accommodate cumulative impacts of this allocation and others in Wolston and Ryton-on-Dunsmore, as set out in the Infrastructure Delivery Schedule (I2). The need for further site specific transport measures would be considered at planning application stage.

Issue	Considerable archaeological interest makes the site unsuitable
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Who raised the issue	Critchley, P
No. raising the issue	1
Council response	The heritage assessment (SS19) did identify the site as having significant potential archaeological interest. This led to preliminary archaeological surveys including a geophysical survey submitted by the site promoter at Regulation 18 preferred options stage which suggest this potential is low. The development will be subject to further assessments at application stage.

Issue	Site is some distance from the school and recreation facilities on Plott Lane - though not far as the crow flies.
Who raised the issue	Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council
No. raising the issue	5
Council response	The school is approximately 10 minutes' walk from the allocation site using the public footpath at the edge of the site. It is acknowledged that this route is not suitable for all weathers or users. Following the main paved roads takes approximately 15 minutes which is still considered to be reasonable for most users. It also 15 minutes' walk to the recreation facilities on Plott Lane. The site will feature its own public open space and is also very close to the Stretton-on-Dunsmore Recreation Ground which includes children's play provision. The development requirements include pedestrian crossing on Fosse Way to create safe access to the recreation ground.

Issue	Land has surface water flooding issues. Drainage needs improving as well as pond at Well Head
Who raised the issue	Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Critchley, P
No. raising the issue	6
Council response	The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) identified surface water flood risk, and a detailed site summary table was prepared (SS11) which concluded the site could be made safe for its lifetime. It noted that flood risk was concentrated in the southern half of the site, which includes the area intended for public open space. Planning permission will be subject to a site-specific flood risk assessment and appropriate drainage schemes.

4.58. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Development requirements including specified open space requirements, direction of frontages and overlooking requirements should be reduced to ensure flexible masterplanning	Ashberry Strategic Land
Requirement for archaeological investigation to inform preservation by design around the potential presence of Roman road remains and associated buildings/evidence	Historic England
Council response to modification proposals: The development requirements are designed to ensure a high-quality and sustainable outcome at this site and introducing too much flexibility risks a poorer outcome with regard to open space provision, site design and safety. Proactive archaeological investigation is already a requirement, however the council has identified the wording suggested by Historic England as a potential modification.	

SITE 348 THE CROFT, STRETTON-ON-DUNSMORE

4.59. 9 representations on behalf of 12 people or organisations argued that the allocation of site 348 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Insufficient mitigatory measures for traffic impacts from the development
Who raised the issue	Cox, Jeremy; Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Waterworth, Tom; Critchley, P; Tett, Tracey
No. raising the issue	10
Council response	The Strategic Transport Assessment (I3) identified that there may be a requirement for upgrades to Princethorpe Crossroads and Bretford Bridge to accommodate cumulative impacts of this allocation and others in Wolston and Ryton-on-Dunsmore, as set out in the Infrastructure Delivery Schedule (I2). This site was found to be preferable to alternatives partly because of its position closer to the strategic road network, reducing some of the traffic through the village. The need for further site specific transport measures would be considered at planning application stage.

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. Unsustainable location due to need to drive to access services.
Who raised the issue	Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Tett, Tracey
No. raising the issue	7
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water.

	<p>Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4.</p> <p>Stretton scored well in the Rural Sustainability Study (SD14) with local access on foot to a primary school, GP surgery, small shop and pub.</p>
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Issue	Little detail available on this site meaning a deficit in the opportunity for public scrutiny - not included at Regulation 18 stage
Who raised the issue	Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council
No. raising the issue	6
Council response	It is true the site was only proposed to be allocated at Regulation 19 stage, and this parcel had been part of a larger omission site (ID 120) at Regulation 18. The second regulation 18 'preferred options' stage was an optional second consultation. The process of preparing the plan was consistent with the regulations and the Statement of Community Involvement. Notably some consultation respondents commented that they preferred it indicating it was available for public scrutiny, albeit in a different context. There will be further consultation on the site once it comes forward as an application.

Issue	When considering the Squires Road site in the current plan, the inspector's report assessed that the boundary for that development would 'form an effective permanent boundary to the Green Belt at this point.' If this site is allocated, it would show this assessment to be incorrect as it would increase incursion into the Green Belt. No valid justification for this.
Who raised the issue	Yates, Alan; Waterworth, Tom
No. raising the issue	2
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt land. It is inherent in plan making that Green Belt boundaries cannot necessarily be permanent. The site allocation and Green Belt boundary is defined by existing field boundaries as is the northern boundary to the Squires Road site, a new defensible Green Belt boundary can be created.

Issue	Development of this site would mean loss of agricultural land, some of which is of historic value as it retains its ridge and furrow heritage.
Who raised the issue	Yates, Alan
No. raising	1

the issue	
Council response	The site is grade 3 agricultural land so is not considered Best and Most Versatile. The validation of landscape sensitivity assessments for small sites report (SS23) noted subtle ridge and furrow visible in the western field. This is a matter than can be considered in more detail at planning application stage.

Issue	Proximity to the A45 requires noise mitigation and safe access
Who raised the issue	Stretton-on-Dunsmore Parish Council
No. raising the issue	1
Council response	Both of these points would be considered in detail at application stage.

Issue	Site has not been subject to robust and consistent assessment in comparison with other sites
Who raised the issue	Critchley, P
No. raising the issue	1
Council response	The council disagrees. Although new in its current form, this parcel of land formed site 120 which was subject to the initial site selection process. Site 348 has been considered in the Stage 2 Site Assessment (SS8) alongside all other sites.

Issue	Site is detached from the village and would be incongruous pattern of development
Who raised the issue	Taylor Wimpey
No. raising the issue	1
Council response	The site is slightly removed from the existing settlement centre but is adjacent to the primary school and will border the upcoming Squires Road site. The overall pattern once built out is not felt to be incongruous.

Issue	One of the more sensitive sites in Stretton for landscape and will harm the rural character of School Lane
Who raised the issue	Taylor Wimpey
No. raising the issue	1
Council	The validation of landscape sensitivity assessments for small sites report (SS23) found

response	the site to have medium/low sensitivity with the main sensitivity being the subtle ridge and furrow. It noted the semi-rural character and limited scenic quality arising from the position adjacent to the football pitches and nearby residential development. The site has a sense of enclosure from boundary vegetation. Any development of fields will change their rural character, but this is not felt to be a reason why the site should not be developed.
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Issue	Increased risk of flooding, the sewerage system is inadequate for new housing
Who raised the issue	Tett, Tracey
No. raising the issue	1
Council response	<p>With regards to flooding, the Strategic Flood Risk Assessment (SS9) and Sequential Test (SS14) found the site to be at low risk of surface water flooding and none of the site is in flood zones 2 or 3.</p> <p>With regards to sewerage, the site was included in residential growth scenario four as modelled by the Stage 2 Water Cycle Study, which concluded that “overall, no issues have been identified that would impede the progress of any development sites” and that “any necessary investments or infrastructure planning can be managed through the established procedures over the course of the plan period”.</p>

Issue	Degradation of habitats for great-crested newts and other wildlife
Who raised the issue	Tett, Tracey
No. raising the issue	1
Council response	The site did not meet the threshold for ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. Further ecology assessments would be required at application stage, and development would be subject to demonstrating that no protected species such as great crested newts are present on the site or would be harmed by the development

Issue	Housing mix is not appropriate – house prices on current Squires Road development have been decreased due to not being sold, this demonstrates that more affordable housing needed rather than larger executive housing
Who raised the issue	Tett, Tracey
No. raising the issue	1
Council	Housing mix will be based on policies H1 and H2 in the local plan which are designed to

response	meet the needs of the borough while ensuring viability of proposals. As a grey belt site, the developer will be required to deliver 40% affordable housing, in line with policy H2.
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4.60. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
New entrance to the school should be created	Key-Vice, Gillian
Development should be joined with Squires Road to enable traffic from both sites to exit onto School Lane	Key-Vice, Gillian
Council response to modification proposals: Both modifications affect land in separate ownership and cannot be guaranteed. This is particularly the case with the second modification. The development requirements encourage the developer to explore active travel connections toward the recreation ground off Plott Lane which would include pedestrian access through the Squires Cross site. Vehicular access is not thought to be realistic.	

SITE 39 DYERS LANE, WOLSTON

4.61. 14 representations on behalf of 242 people or organisations argued that the allocation of site 39 is unsound. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (schools, hospitals etc) and transport links to support new housing
Who raised the issue	Farmer, Antony; Ward, Ettillia-Shai; Kenney, Neil; Lumsden, Peter; Willis, Tim; Ramsay, Terence; Mumford, Fiona; Rainey, Graham; Lumsden, Jennifer; Wolston Parish Council; MacFarlane, Iain; Thorne, Elizabeth
No. raising the issue	240
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4.

Issue	Use of Green Belt land is unjustified. Brownfield land should be prioritised
Who raised the issue	Farmer, Antony; Ward, Ettillia-Shai; Kenney, Neil; Mumford, Fiona; Rainey, Graham; Lumsden, Jennifer; Wolston Parish Council; MacFarlane, Iain; Thorne, Elizabeth
No. raising	237

the issue	
Council response	It is not possible to meet the Borough's housing need using brownfield land. The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt. Wolston has one of the larger populations of the main rural settlements and scores well in the Rural Sustainability Study (SD14) which is felt to justify this allocation.

Issue	Unacceptable impact on landscape, and/or contrary to high landscape sensitivity identified in previous evidence
Who raised the issue	Ward, Ettillia-Shai; Kenney, Neil; Ramsay, Terence; Wolston Parish Council
No. raising the issue	232
Council response	The Landscape Sensitivity Assessment for smaller sites (SS22-23) found the site to have low sensitivity due to its enclosure, location in between residential development and the cemetery and telephone exchange. The main sensitivity arises from the tranquillity. The plan is based on current evidence.

Issue	The village centre has insufficient parking to accommodate the additional cars that will be brought by further housing.
Who raised the issue	Kenney, Neil; Thorne, Elizabeth
No. raising the issue	2
Council response	The site is within reasonable walking distance of village services and so is not expected to create a significant increase in demand for parking in the village.

Issue	Developing the site will have unacceptable ecological impacts - lack of ecological survey
Who raised the issue	Kenney, Neil; Wolston Parish Council
No. raising the issue	230
Council response	The site did not meet the threshold for an ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. Ecology assessments will be required at application stage.

Issue	Site is susceptible to flooding and sewerage would be an issue
Who raised the issue	Kirkman, Frederick; Mumford, Fiona; Rainey, Graham; Wolston Parish Council; MacFarlane, Iain; Hill, Alison

No. raising the issue	234
Council response	The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) found the site to have low surface water flood risk and none of the site is in flood zones 2 or 3. The Stage 2 Water Cycle Study concluded the site would have a medium impact on the foul sewerage system and low impact on the surface water sewerage system. It was concluded to be low risk by Severn Trent Water.

Issue	Access to and from the site will struggle under additional traffic - Dyers Lane is narrow with limited pathways and frequently used by dogwalkers and horse riders, and those accessing playing fields
Who raised the issue	Rainey, Graham; Thorne, Elizabeth; Hill, Alison
No. raising the issue	3
Council response	This is a small site allocation for 15 units so any traffic impacts on Dyers Lane are not expected to be substantial.

Issue	Scale of development is disproportionate to the village and would harm local character, rural setting and built form
Who raised the issue	Lumsden, Jennifer
No. raising the issue	1
Council response	This site is for a small-scale development of 15 units and is not considered to be disproportionate or harmful to the village setting. The total number of units allocated at Wolston is c.95 which is relatively low given Wolston is one of the larger rural settlements. Proposals will be required to be in keeping with the local character and not harm the setting of the village.

SITE 136 NORTH OF WARWICK ROAD, WOLSTON

4.62. 20 representations on behalf of 248 people or organisations argued that the allocation of site X is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Unsustainable location for 55+ housing due to distance from local services, hospital and setting at the top of a hill
Who raised the issue	Hughes, Kerry; Moore, Donald; Ward, Ettillia-Shai; Kenney, Neil; Thursfield, Keith; Lumsden, Peter; Willis, Tim; Lumsden, Jennifer; Mistry, Bipin; Wolston Parish Council; Thorne, Elizabeth; Beament, Sally; Bearne, Andrew
No.	241

raising the issue	
Council response	The site is 15 minutes' walk from the GP surgery, 13 minutes' walk from small supermarket and 10 minutes' walk from the library and information centre. This is considered to be as sustainable a location as within a suburb of Rugby where housing may be a similar distance from a local centre. The walk into the village is largely flat.

Issue	Unacceptable harm to residential amenity of existing residents e.g. noise, traffic, green space
Who raised the issue	Hughes, Kerry; Malin, M; Moore, Donald; Kenney, Neil; Thorne, Elizabeth; Bearne, Andrew
No. raising the issue	6
Council response	The relatively small scale of development and existing tree line buffer with properties on Millenium Way means the proposal is not anticipated to have significant harm on nearby residents regarding material planning considerations. Planning permission will only be granted if the layout, design and massing of the proposal will not cause harm to residential amenity of nearby properties.

Issue	Lack of regard for conservation area, village character/identity and green belt status
Who raised the issue	Hughes, Kerry; Malin, M; Farmer, Antony; Ward, Ettillia-Shai; Willis, Tim; Rainey, Graham; Lumsden, Jennifer; Thorne, Elizabeth; Bearne, Andrew
No. raising the issue	9
Council response	The site is well removed from the village conservation area and listed buildings and does not likely contribute to its setting. The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt. Wolston has one of the larger populations of the main rural settlements and scores well in the Rural Sustainability Study (SD14) which is felt to justify this allocation.

Issue	Lack of infrastructure/Overburden on services (GP surgery, hospital, schools etc)
Who raised the issue	Malin, M; Farmer, Antony; Fletcher, Martin; Kenney, Neil; Hewitt, Michael; Lumsden, Peter; Willis, Tim; Ramsay, Terence; Rainey, Graham; Lumsden, Jennifer; Mistry, Bipin; Wolston Parish Council; Thorne, Elizabeth; Beament, Sally; Bearne, Andrew
No. raising the issue	243
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. This site has been allocated for over 55s housing to avoid impacts on capacity at the

	primary school. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4.
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Issue	Wolston experiences flooding - increased flood risk has not been fully investigated
Who raised the issue	Fletcher, Martin; Moore, Donald; Thursfield, Keith; Willis, Tim; Ramsay, Terence; Mistry, Bipin; Wolston Parish Council; Bearne, Andrew
No. raising the issue	236
Council response	The local plan cannot address existing issues. Flood risk is managed by the Lead Local Flood Authority which is Warwickshire County Council and the Environment Agency. The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) found the site to have low surface water flood risk and none of the site is in flood zones 2 or 3. The site would need to demonstrate it will not increase flood risk elsewhere at application stage.

Issue	Harms to wildlife from loss of habitats - no ecological review of the site which abuts a Local Wildlife Site (LWS)
Who raised the issue	Thursfield, Keith; Willis, Tim; Ramsay, Terence; Lumsden, Jennifer; Mistry, Bipin; Wolston Parish Council
No. raising the issue	234
Council response	The site was subject to an ecological constraints assessment (SS25) which concludes that there are medium constraints, but the site has potential to be take forward for development subject to site design and mitigatory measures. The allocation does not directly abut a LWS although it is within 1km of the River Avon and Tributaries LWS. Further ecological surveys and mitigation schemes will be required at application stage.

Issue	Risk of utilities overload (Drainage, sewerage, water, gas, electricity)
Who raised the issue	Malin, M; Hewitt, Michael; Thursfield, Keith
No. raising the issue	3
Council response	The site selection and plan making process has involved consultation with the relevant utilities providers to ensure they can meet demand. The Stage 2 Water Cycle Study (I10) found the site to have a low potential impact on the foul sewerage infrastructure and a low potential impact on the surface water sewerage infrastructure i.e. drainage. Severn Trent Water did not raise comments on this site.

Issue	Site is within Minerals Safeguarding Area and concern about future working and restoration of Wolston sand and gravel quarry
Who	Warwickshire County Council

raised the issue	
No. raising the issue	1
Council response	<p>Under its current planning permission Wolston quarry is required to cease quarrying and complete remediation by October 2027. The operation of the quarry is therefore not an impediment to the site coming forward during the plan period. Notwithstanding that, the council has identified a potential modification to the plan stating that the site should not be occupied until the quarrying has been finished.</p> <p>In relation to safeguarding of minerals, the council agrees with Warwickshire County Council that this will be assessed at planning application stage in line with the minerals local plan policies.</p>

Issue	Allocation for older persons' housing will place a greater burden on the local GP surgery and on social care services - concerns raised in previous representations by Integrated Care Board (ICB) and Warwickshire County Council (WCC)
Who raised the issue	Willis, Tim
No. raising the issue	1
Council response	The Wolston GP surgery has fewer patients per full time GP than most other practices within the Borough. The site selection and plan making process has involved consultation with the ICB who identified d improvement and expansion options to accommodate the growth – this would be covered by S106 agreements and/or CIL funds. WCC has not raised this concern at Regulation 19 consultation.

Issue	Previous landscape studies have indicated that the land has 'high sensitivity' to housing development
Who raised the issue	Rainey, Graham; Lumsden, Jennifer; Mistry, Bipin; Wolston Parish Council
No. raising the issue	232
Council response	The plan is based on current evidence. The Landscape Sensitivity Assessment for smaller sites (SS22) found the site to have medium/low sensitivity due to its simple landform and features. The Validation of the landscape sensitivity assessment (SS23) concurred with that assessment. The main sensitivities arise from intervisibility with nearby properties and the PRoW. Views to the north and west are to be incorporated into the layout design.

Issue	55+ accommodation is unlikely to offer affordable housing
Who raised the issue	Lumsden, Jennifer; Mistry, Bipin; Bearne, Andrew

No. raising the issue	3
Council response	It is true that specialist older persons' housing is exempt from the plan's wider affordable housing delivery requirements in Policy H2. This is based on the viability evidence.

Issue	Scale of development is of disproportionate scale with village and would harm local character, rural setting and built form
Who raised the issue	Lumsden, Jennifer; Mistry, Bipin
No. raising the issue	2
Council response	Wolston is one of the larger main rural settlements and scores well in the Rural Sustainability Study (SD14) with access to a primary school, GP surgery, small supermarket, library and leisure centre. This allocation for 80 units (and total allocations at Wolston for 95 units) is considered to be proportionate to the scale of the village and its services. Development proposals will need to be in keeping with the local character and not harm the rural setting.

Issue	Location & access to public transport etc make it unlikely that this site will go ahead as a retirement development & therefore likely it will revert to a non-retirement site/trojan horse for housing estate
Who raised the issue	RBC Conservative Group; Beament, Sally
No. raising the issue	17
Council response	This allocation is considered to be in a suitable location for over 55s housing or 1-2-bedroom bungalows and will meet local need. An application that is not in accordance with this policy would be contrary to the development plan.

Issue	There should be no access through Millenium Way
Who raised the issue	Beament, Sally
No. raising the issue	1
Council response	A pedestrian access point through Millenium Way would improve active travel connections between the site, other neighbourhoods and Wolston services, in line with NPPF para 96. It is therefore felt to be justified. No vehicular access through Millenium Way is proposed.

Issue	No requirements are proposed to safeguard the wildlife-rich pond in the NW corner of the site which is inconsistent with needs of national policy (NPPF 192)
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Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	Noted. The site will be subject to further ecological assessment at application stage. There is no conflict with para 192 NPPF.

4.63. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Protect the boundaries of the site with a wildlife corridor with potential for walking routes	Thursfield, Keith
Any proposal should have a development requirement to retain/safeguard the pond in the NW corner of the site and its surroundings.	Willis, Tim; Allanach, Richard
Council response to modification proposals: The proposal will need to comply with national policy and EN1, EN5 and EN6 with regard to protecting and enhancing biodiversity. Further ecological assessment will be undertaken at application stage, and the above recommended mitigations could be managed through the application process.	

SITE 358 LAND AT COVENTRY ROAD, WOLVEY

4.64. 170 representations on behalf of 176 people or organisations argued that the allocation of site 358 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Harm to village identity and quiet rural character through inappropriate and disproportionate level of growth
Who raised the issue	Evans, Elizabeth; Dhadwal, Sandeep; James , Charles; James, Catharine; Keogh, Damian; Court, Gerry & Carol; Spencer, June; Ling, Philip; Jones, David; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Dhadwal, Alicja; McDonagh, Judith; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Isaac, Susan; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Bassett, Graham; Chrimes, Brian; Bilton Grange School; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; West, Annette; Mr and Mrs Hudson; Beales, Dominic; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; Moore, Diane; Fisher, Hilary; Callery, Ruth; Fisher, Michael; Kelly, Patrick and Linda; Sheffield, Andy; Downes, Steve and Allyson; Hilliard, Sharon; Lovett, Lorna; Lovett, Peter; Lee, Joanne
No.	82

raising the issue	
Council response	The quantum of development at Wolvey has been substantially reduced since Regulation 18 and now totals 210 dwellings across both sites. This is thought to be more commensurate with the size of the village. As explained in, for example, the Green Belt Exceptional Circumstances Topic Paper (GBD4) the scale of housing needs in the borough mean that development at the borough's main rural settlements is considered to be necessary. The scale of allocations at individual settlements reflects the availability of land and constraints including (amongst other things) school place capacities, heritage and landscape. Wolvey is relatively less constrained in terms of school capacity, heritage and landscape constraints and land availability than some of the other main rural settlements.

Issue	Loss of Green Belt land contrary to national policy
Who raised the issue	Evans, Elizabeth; Henry, C D and L A; James , Charles; James, Catharine; Pare, Jennifer; Pare, Matthew; Spencer, June; Court, Gerry & Carol; Griffin, Colin; Jones, David; Jones, Barbara; Ling, Philip; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Connearn, Michael; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Bassett, Graham; White, Claire; White, Garrie; Nycz, Janina; Billington, Glynis; Chrimes, Brian; Wiltshire, Lindsay; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Bates, David; Matts, Sandra; Matts, Charlie; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; West, Annette; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Coope, Joanne; Webb, Jacqueline; Moore, Diane; Tritax Big Box Developments Ltd (Site 17); Fisher, Hilary; Callery, Ruth; Fisher, Michael; Maoudis, Rebecca; Hilliard, Sharon; Lovett, Anne; Lovett, Peter; Lee, Joanne; Hudson, Patricia; Hudson, Giles; Myers, Ann
No. raising the issue	99
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt.

Issue	Ecological harm and loss of local habitats and open space
Who raised the issue	Evans, Elizabeth; Henry, C D and L A; James , Charles; McDonagh, Judith; McDonagh, Terry; Higginson, Helen; Gronow, Yvonne; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Russell, Pauline; Bassett, Graham; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Bates, David; Matts, Sandra; Matts, Charlie;

	Morley, Thomas; Morley, Victoria; West, Annette; Webb, Jacqueline; Miller, Stuart; Moore, Diane
No. raising the issue	44
Council response	This site did not meet the threshold for ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. A site-specific ecology assessment will be required at application stage. The site currently has no public access, so the allocation is not thought to result in harmful loss of open space.

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. Unsustainable location due to need to drive to access services
Who raised the issue	James , Charles; James, Catharine; Pare, Jennifer; Pare, Matthew; Keogh, Damian; Court, Gerry & Carol; Spencer, June; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crispin, Elizabeth; Brown, Natalie; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Baker, Michael; Baker, Irene; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Bassett, Graham; White, Claire; Tarrant, John; White, Garrie; Pitt, Michelle; Billington, Glynis; Chrimes, Brian; Trevelyan, Michael; Bilton Grange School; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Bates, David; Matts, Sandra; Matts, Charlie; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Morley, Thomas; Morley, Victoria; West, Annette; Mr and Mrs Hudson; Beales, Dominic; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Beales, Katherine; Kang, Jane; Critchley, P; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; Collins, Sarah; Collins, Michael; Billington, Richard; Moore, Diane; Lambert and Ellis, Vanessa and Gordon; Ward, John; Walker, Robert Scott; Coope, Neal; Fisher, Hilary; Callery, Ruth; Fisher, Michael; Maoudis, Rebecca; Kelly, Patrick and Linda; Sheffield, Andy; Downes, Steve and Allyson; Hilliard, Sharon; Lovett, Lorna; Lovett, Peter; Lee, Joanne; Myers, Robert; Leeding, Marion; Jones, Caryl
No. raising the issue	125
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. There are day-to-day services available within the village such as a primary school, GP provision, small convenience store and two pubs.

	Bus routes connect to the hospital and services in Coventry, and to Nuneaton.
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Issue	Effect of extra traffic on road infrastructure and issues with on-street parking
Who raised the issue	West, David; Jones, Christina; West, Annette
No. raising the issue	3
Council response	The Strategic Transport Assessment (I3) did not identify any significant impacts arising from this allocation. The development will need to comply with the parking standards set out in Appendix 2 of the Local Plan document which will make provision for new occupants of the development. The proximity of the site to village services means a significant increase in demand for on-street parking in the village is not anticipated.

Issue	Potential for flooding increased
Who raised the issue	West, David; Matts, Sandra; Matts, Charlie; Morley, Thomas; Morley, Victoria; West, Annette; Miller, Stuart
No. raising the issue	7
Council response	The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) found the site to be at low risk of flooding and is not anticipated to increase flooding elsewhere. Further site-specific flood risk assessments would be required at application stage.

Issue	Location is on prime productive farmland
Who raised the issue	Woolford, Wayne; Billington, Richard
No. raising the issue	2
Council response	The site is grade 3 agricultural land and is not considered Best and Most Versatile. The scale of land being developed (2.27ha) is low.

Issue	Reduction in quantum of development from Preferred Option plan is unjustified
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	We disagree. However, the requirement is for the council to demonstrate that the proposed submission plan is an appropriate strategy based on proportionate evidence. There is not a requirement to justify changes from previous stages of plan-making. It was always made clear that options identified at preferred options stage were a work in progress and subject to change based on responses to the consultation and the gathering

	<p>of additional evidence.</p> <p>The reduction in quantum of development compared to the preferred options stage is based on a reduced housing requirement (as a result of a reduced plan period), an increase in allocations on town centre brownfield sites, and new allocations proposed elsewhere in the borough. The resulting plan is considered justified.</p>
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4.65. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Reduce allocation to only include the conversion of existing farm buildings	King, Thelma
Extension to existing 30mph zone required	Warwickshire County Council
Allocate the full site as per the Preferred Option Local Plan	Rosconn Group
Amend the allocation to align with Marrons proposal, as accepted by Wolvey Parish Council	Allanach, Richard
<p>Council response to modification proposals:</p> <p>Reduction of the allocation would mean a substantially reduced housing delivery and there are not clear reasons why this change is needed on soundness grounds.</p> <p>Specific highways considerations can be addressed at application stage.</p> <p>The reasons for reducing the scale of the site allocation compared to the preferred options stage are summarised above.</p> <p>The Marrons proposal referred by Richard Allanach to was first submitted in response to the Regulation 19 consultation although incorporates land previously submitted as part of a larger site in response to the earlier call for sites. This is an omission site. The council considers that there are not clear soundness reasons to modify the plan to allocate this omission site.</p>	

SITE 309 LAND NORTH OF B4109, WOLVEY

4.66. 206 representations on behalf of 212 people or organisations argued that the allocation of site 309 is unsound. One person argued the allocation is sound. The following main issues were raised with this site allocation:

Issue	Harm to village identity and quiet rural character through inappropriate and disproportionate level of growth
Who raised the issue	Evans, Elizabeth; Dhadwal, Sandeep; Harris, Corrie; James , Charles; Warwick, Adrian; Warwick, Julie; Wilson, Robert; James, Catharine; Wolvey Parish Council; Smith, David; Pare, Jennifer; Pare, Matthew; Keogh, Damian; Court, Gerry & Carol; Spencer, June; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Brannigan, Jonathon; Dhadwal, Alicja; McDonagh, Judith; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan;

	Suckling, Karen; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Hawkins, Rachel; Bassett, Graham; White, Claire; White, Garrie; Nycz, Janina; Pitt, Janina; Chrimes, Brian; Bilton Grange School; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Coton Park East Committee; Bates, David; Matts, Sandra; Matts, Charlie; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Hopkins, Matthew; West, Annette; Gillman, Sarah Elizabeth; Mr and Mrs Hudson; Beales, Dominic; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Beales, Katherine; Coope, Joanne; Silvester, William; Webb, Jacqueline; Miller, Stuart; Moore, Diane; Bassnett, Susan; Gillman, Keith Neville; Reeve, Michael David; Ward, Jane; Fisher, Hilary; Fisher, Michael; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Bearn, Andrew; Kelly, Patrick and Linda; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Hilliard, Sharon; Bates, Malcolm; Lovett, Lorna; King, Andrew; King, Alison; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Hall, William; Hall, Adrian; Hall, Susan; Hall, Ned; Hall, Ian (2); Lee, Joanne; Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Marian; McCormack, Neil; Chadwick, Anne-Marie; Bailey, Deirdre; Wiltshire, Melanie; Pitt, Michelle
No. raising the issue	196
Council response	The quantum of development at Wolvey has been substantially reduced since Regulation 18 and now totals 210 dwellings across both sites. This is thought to be more commensurate with the size of the village. As explained in, for example, the Green Belt Exceptional Circumstances Topic Paper (GBD4) the scale of housing needs in the borough mean that development at the borough's main rural settlements is considered to be necessary. The scale of allocations at individual settlements reflects the availability of land and constraints including (amongst other things) school place capacities, heritage and landscape. Wolvey is relatively less constrained in terms of school capacity, heritage and landscape constraints and land availability than some of the other main rural settlements.

Issue	Loss of Green Belt land contrary to national policy
Who raised the issue	Evans, Elizabeth; Henry, C D and L A; Farmer, Antony; Harris, Corrie; James, Charles; Warwick, Adrian; Warwick, Julie; Wilson, Margaret; Wilson, Robert; Wolvey Parish Council; Smith, David; Pare, Jennifer; Pare, Matthew; Spencer, June; Court, Gerry & Carol; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Brannigan, Jonathon; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Connearn, Michael; Jones, Christina; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Hawkins,

	Rachel; Bassett, Graham; White, Claire; White, Garrie; Nycz, Janina; Chrimes, Brian; Wiltshire, Lindsay; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Coton Park East Committee; Matts, Sandra; Matts, Charlie; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Billington, Richard; West, Annette; Beales, Dominic; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Beales, Katherine; Coope, Joanne; Silvester, William; Webb, Jacqueline; Moore, Diane; Bassnett, Susan; Gillman, Keith Neville; Reeve, Michael David; Ward, John; Ward, Jane; Fisher, Hilary; Fisher, Michael; Wells, Richard; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Bearne, Andrew; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Hilliard, Sharon; Bates, Malcolm; Lovett, Alex; Lovett, Anne; King, Andrew; King, Alison; Bailey, Andrew; Briggs, Georgina; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Hall, William; Hall, Adrian; Hall, Susan; Hall, Ned; Hall, Ian (2); Lee, Joanne; Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Marian; McCormack, Neil; Chadwick, Anne-Marie; Bailey, Deirdre; Wiltshire, Melanie; Pitt, Michelle; Pitt, Janina
No. raising the issue	206
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt.

Issue	Ecological harm and loss of local habitats and open space. No full ecological survey conducted despite proximity to Local Wildlife Site (LWS)
Who raised the issue	Evans, Elizabeth; Hughes, Donna; Henry, C D and L A; Harris, Corrie; James , Charles; James, Catharine; Wolvey Parish Council; Smith, David; Pare, Jennifer; Pare, Matthew; Spencer, June; Court, Gerry & Carol; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Brannigan, Jonathon; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Wolvey Wetland Trust; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Suckling, Karen; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Connearn, Michael; Jones, Christina; Goffin, Catherine; Russell, Pauline; Black, John; Hawkins, Rachel; Bassett, Graham; White, Claire; White, Garrie; Nycz, Janina; Pitt, Janina; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Coton Park East Committee; Bates, David; Matts, Sandra; Matts, Charlie; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Billington, Richard; Morley, Thomas; Morley, Victoria; Hopkins, Matthew; West, Annette; Gillman, Sarah Elizabeth; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Coope, Joanne; Silvester, William; Silvester, Margaret; Webb, Jacqueline; Miller, Stuart;

	Moore, Diane; Bassnett, Susan; Gillman, Keith Neville; Reeve, Michael David; Lambert and Ellis, Vanessa and Gordon; Reeve, Kathleen; Bassnett Barker, Rosanna; Ward, Jane; Nixon, Clare; Fisher, Hilary; Fisher, Michael; Wells, Richard; Maoudis, Rebecca; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Bearne, Andrew; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Kelly, Patrick and Linda; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Hilliard, Sharon; Bates, Malcolm; Lovett, Alex; King, Andrew; King, Alison; Briggs, Georgina; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Hall, William; Hall, Adrian; Hall, Susan; Hall, Ned; Hall, Ian (2); Lee, Joanne; Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Marian; McCormack, Neil; Chadwick, Anne-Marie; Bailey, Deirdre; Wiltshire, Melanie; Pitt, Michelle; Allanach, Richard
No. raising the issue	216
Council response	The site is adjacent to a potential LWS which is a site that has been nominated but not yet surveyed or assessed to consider whether it is suitable for designation. The site therefore did not meet the threshold for the ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. Further ecology assessments will be required at application stage. The development requirements for the site include the following “Delivery of a landscape buffer on the site’s northern boundary to soften views from the Anker Valley and be the focus for ecological enhancements alongside the Anker Meadows Local Green Space and River Anker floodplain.”. There are no ecology-based soundness issues with this allocation.

Issue	Site was found to have high landscape sensitivity in 2016 assessment, and the area has not changed since
Who raised the issue	James , Charles; Warwick, Adrian; Warwick, Julie; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Spencer, June; Court, Gerry & Carol; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Brannigan, Jonathon; Dhadwal, Alicja; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Connearn, Michael; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Hawkins, Rachel; Bassett, Graham; White, Claire; White, Garrie; Nycz, Janina; Pitt, Janina; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Coton Park East Committee; Bates, David; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Gillman, Sarah Elizabeth; Beales, Dominic; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Beales, Katherine; Coope, Joanne; Webb, Jacqueline; Moore, Diane; Gillman, Keith

	Neville; Reeve, Michael David; Reeve, Kathleen; Ward, Jane; Fisher, Hilary; Fisher, Michael; Maoudis, Rebecca; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Bearne, Andrew; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Kelly, Patrick and Linda; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Bates, Malcolm; Lovett, Lorna; Lovett, Peter; King, Andrew; King, Alison; Briggs, Georgina; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Hall, William; Hall, Adrian; Hall, Susan; Hall, Ned; Hall, Ian (2); Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Marian; McCormack, Neil; Chadwick, Anne-Marie; Bailey, Deirdre; Wiltshire, Melanie; Pitt, Michelle
No. raising the issue	192
Council response	The Landscape Sensitivity Assessment for smaller sites (SS22) found the site to have medium/low sensitivity due to the enclosure from hedgerows and concentration of trees along the boundary of the River Anker. The plan is based on current evidence – even if the site may not have substantially changed since 2016, all sites were assessed from scratch in 2025 to provide up-to-date evidence. This work was reviewed by independent specialists at Lepus (SS23) who concurred with its findings. The development requirements for this site include delivery of a landscape buffer on the northern boundary to soften views from the Anker Valley, with hedgerows retained to the south along the B4109.

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. Unsustainable location due to need to drive to access services - ranked the least sustainable village
Who raised the issue	Farmer, Antony; Harris, Corrie; James , Charles; Warwick, Adrian; Warwick, Julie; Wilson, Margaret; Wilson, Robert; James, Catharine; Wolvey Parish Council; Smith, David; Pare, Jennifer; Pare, Matthew; Keogh, Damian; Court, Gerry & Carol; Spencer, June; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Brannigan, Jonathon; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Suckling, Karen; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Connearn, Michael; Baker, Michael; Baker, Irene; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Hawkins, Rachel; Bassett, Graham; White, Claire; Tarrant, John; White, Garrie; Nycz, Janina; Pitt, Michelle; Pitt, Janina; Billington, Glynis; Chrimes, Brian; Trevelyan, Michael; Bilton Grange School; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Coton Park East Committee; Bates, David; Matts, Sandra; Matts, Charlie; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Billington, Richard; Morley, Thomas; Morley, Victoria; Hopkins, Matthew; West, Annette; Gillman, Sarah Elizabeth; Mr and Mrs Hudson;

	Beales, Dominic; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Beales, Katherine; Kang, Jane; Critchley, P; Coope, Joanne; Silvester, Margaret; Webb, Jacqueline; Miller, Stuart; Collins, Sarah; Collins, Michael; Moore, Diane; Bassnett, Susan; Gillman, Keith Neville; Reeve, Michael David; Lambert and Ellis, Vanessa and Gordon; Reeve, Kathleen; Coope, Neal; Nixon, Clare; Fisher, Hilary; Fisher, Michael; Wells, Richard; Maoudis, Rebecca; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Bearne, Andrew; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Kelly, Patrick and Linda; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Hilliard, Sharon; Bates, Malcolm; Lovett, Lorna; Lovett, Alex; Lovett, Peter; King, Alison; Briggs, Georgina; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Hall, William; Hall, Adrian; Hall, Susan; Hall, Ned; Hall, Ian (2); Lee, Joanne; Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Marian; McCormack, Neil; Myers, Robert; Leeding, Marion; Chadwick, Anne-Marie; Bailey, Deirdre; Wiltshire, Melanie; Pitt, Michelle; Jones, Caryl
No. raising the issue	237
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. There are day-to-day services available within the village such as a primary school, GP provision, small convenience store and two pubs. Bus routes connect to the hospital and services in Coventry, and to Nuneaton.

Issue	Site is likely at risk of flooding and potential for flooding elsewhere increased - existing developments already causing flooding, sewer capacity is insufficient & this site is below the sewer, requiring pumping
Who raised the issue	Crispin, Elizabeth; West, David; Hilliard, Robert; Suckling, Karen; Jones, Christina; Hawkins, Rachel; Matts, Sandra; Matts, Charlie; Morley, Thomas; Morley, Victoria; Hopkins, Matthew; West, Annette; Gillman, Sarah Elizabeth; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Miller, Stuart; Gillman, Keith Neville; Reeve, Michael David; Reeve, Kathleen; Wells, Richard; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Evans, Rachel; Hughes, Anne; Evans, Ben; Evans, Millie; Evans, Mark; Hilliard, Sharon; Lovett, Alex; Lovett, Peter; Lee, Joanne
No. raising the issue	44
Council response	The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) show that 99.8% of the site lies within Flood Zone 1 (low risk of fluvial flooding). The site also has low surface

	<p>water flood risk. Further flood assessments would be required at application stage and must show that flood risk would not increase elsewhere.</p> <p>The Stage 2 Water Cycle Study found the site would have a medium potential impact on the sewerage infrastructure and a low impact on the surface water sewerage infrastructure. Sewerage infrastructure is not identified in the Water Cycle Study as a constraint to the development of the site.</p>
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Issue	Effect of extra traffic on road infrastructure and issues with on-street parking
Who raised the issue	Crispin, Elizabeth; West, David; Jones, Christina; Hawkins, Rachel; Hopkins, Matthew; West, Annette; Gillman, Sarah Elizabeth; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Bassnett, Susan; Gillman, Keith Neville; Reeve, Michael David; Lovett, Lorna
No. raising the issue	17
Council response	The Strategic Transport Assessment (I3) did not identify any significant impacts arising from this allocation. The development will need to comply with the parking standards set out in Appendix 2 of the Local Plan document which will make provision for new occupants of the development. The proximity of the site to village services means a significant increase in demand for on-street parking in the village is not anticipated.

Issue	Location is on prime productive farmland
Who raised the issue	Woolford, Wayne
No. raising the issue	1
Council response	Most of the site is grade 3 agricultural land and is not considered Best and Most Versatile. Only a small proportion is grade 2. The site area is low.

Issue	Water supply to and drainage from the development cannot be guaranteed
Who raised the issue	Gillman, Sarah Elizabeth; Gillman, Keith Neville; Reeve, Michael David; Reeve, Kathleen
No. raising the issue	4
Council response	<p>The Stage 2 Water Cycle Study (I10) identified a shortfall in water supply capacity at Wolvey with improvements needed, including an upgrade to the Bramcote Wolvey Booster Station and new mains. This scheme is set out in the Infrastructure Delivery Schedule (I2) and will be delivered by Severn Trent Water as part of ongoing upgrade works.</p> <p>The Stage 2 Water Cycle Study (I10) found there to be low potential impact of this site on the surface water sewer system i.e. drainage.</p>

Issue	No safe access points to the site
Who	Reeve, Kathleen

raised the issue	
No. raising the issue	1
Council response	Vehicular access is proposed from the B4109 – the specific access arrangements will be determined at application stage and subject to highways consultation. Pedestrian and cycle access will be from Hall Lane. It is considered that safe access will be achievable.

4.67. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Potential connection to Bulkington Road cul-de-sac	Warwickshire County Council
Amend second development requirement to clarify that PRoW retention only applies within the site boundary, and diversions are also acceptable where a preferred solution can be delivered	Places for People
Amend fifth development requirement to permit loss of hedgerow when allowing for access	Places for People
<p>Council response to modification proposals: The current development requirements are designed to ensure a high-quality and sustainable outcome at this site. Further connection options can be considered at application stage as part of the site layout.</p> <p>It is implicit in the fifth bullet point when read in conjunction with the first bullet point that removal of the hedgerow to facilitate the creation of the access is permissible and necessary. No modification is therefore necessary to address this point.</p>	

RESIDENTIAL SITE ALLOCATIONS IN RESPONSE TO WHICH NO MAIN ISSUES OR RECOMMENDED MODIFICATIONS WERE RAISED

4.68. No representations received pursuant to Regulation 20 commented specifically on the soundness of the following proposed residential allocations:

- 62 Morgan Sindall House, Rugby
- 332 Albert Street, Rugby
- 355 Land adjacent to 44 Craven Road, Rugby
- 294 Land adjacent 9 Railway Terrace, Rugby
- 356 The Railings (NHS) Rugby
- 357 28-29 High St, Rugby
- 352 Former snooker hall, Railway Terrace
- 349 Land to rear of Albert St, Rugby

POLICY S7 EMPLOYMENT ALLOCATIONS

4.69. 31 representations on behalf of 143 people or organisations argued that policy S7 is unsound.

Three representations on behalf of three people or organisations argued that the policy is sound. The following main issues were raised with Policy S7. The main issues raised in respect of each of the proposed employment site allocation in the Proposed Submission Local Plan are given beneath the general comments.

- 4.70. Some respondents completed the representation form to comment only on the soundness of a specific site allocation and not Policy S7 overall. These representations are counted against the individual site allocations below but not against S7. As site allocations are listed in S7, this means that a higher number of respondents objected to S7 than is captured in the numbers above.

Issue	Policy S7 is unsound because it does not allocate an omission site.
Who raised the issue	Windsor Developments Limited; Manse Opus and Sir Thomas Whire's Charity; S&D Postlethwaite; Barberry Ansty Limited; Manse Opus and Rolls Royce Plc; Mr N Williams and Miss E Williams the landowners of Land at Mill House, Dunchurch ; Prologis UK Limited; Mountpark Logistics EU Sarl; Tarmac Trading Ltd; BARJANE; Catesby Estates; Stoford Properties Ltd; Taylor, Jenna; Windsor Developments (Site 145); Ashfield Land; Swanvale Developments Ltd; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes; Richborough Commercial (M45 J1); Warwickshire Property and Development Group (site 18); Mitchell, Stuart; Green, Daniel
No. raising the issue	26
Council response	<p>This argument was framed in different ways by different promoters, often focussing on the relative merits of omissions sites versus proposed allocations and how these were assessed through the site selection process and Sustainability Appraisal.</p> <p>The council has undertaken a clear and logical site selection process which is explained in the Spatial Strategy and Site Selection Methodology Summary (SS1). That process necessarily involved a range of judgements made by planning officers. It is certain that some omission site promoters will wish to dispute that evidence, potentially in some cases on a line by line basis challenging every micro judgement made therein. It will be for the inspectors to determine whether examination time should be used for this. It is noted that para 5.15 of the Procedure Guide for Local Plan Examinations states “the merits of sites not allocated in the submitted plan (known as “omission sites”) will not normally be discussed at the hearing sessions. This is because the focus of the examination is on the soundness of the submitted plan”.</p>

Issue	Reliance on large allocations with significant infrastructure requirements creates delivery risk
Who raised the issue	Windsor Developments Limited; Windsor Developments (Site 145)
No. raising the issue	2
Council response	The borough has high demand as an industrial and logistics location. This type of development is very viable in the borough.

	<p>The track record is of employment sites, even those requiring significant on-site infrastructure, being built out quickly.</p> <p>The development consent order for the Walsgrave A46 junction – needed for the Crouner Fields Farm and Walsgrave Hill sites - has been confirmed and this is funded.</p> <p>The Strategic Transport Assessment (document I3-I6) provides details of the other off-site transport infrastructure requirements.</p> <p>There are no impediments to the site allocations coming forward, and therefore no significant delivery risks.</p>
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Issue	Inadequate provision for smaller/medium sized units (particularly freehold)
Who raised the issue	Windsor Developments Limited; S&D Postlethwaite; Barberry Ansty Limited; Richborough Commercial (M45 J1)
No. raising the issue	5
Council response	<p>A similar issue was identified under Policy S3.</p> <p>Although the evidence base combines a need for strategic sites and a ‘local’ need for smaller units, a single industrial land requirement is set. Large units are built on small sites and vice versa. Setting different requirements for smaller and larger buildings would create a planning policy that would be impossible to implement and monitor, given that local plans and DM decisions seldom determine the specific size of units that can be built on sites, which is generally market-led.</p> <p>There is, however, clearly a quantitative and qualitative identified demand for smaller units. In response to this, the plan specifically requires smaller units to be delivered on the sites at Coton Park East and Walsgrave Hills.</p> <p>Several representors argue that (smaller) omission sites should be allocated in place of the plan allocations because they are more likely to be developed for smaller units. However, it is not the case that small sites = small units. There are numerous examples in the borough of small sites being developed for large units.</p> <p>The tenure of units (leasehold versus freehold) is not something planning policies can control.</p>

Issue	Site 95 Crouner Fields Farm is a "closed site"/named operator site therefore not generally available to occupiers. The same applies to Padge Hall farm (this site is a commitment, and this point was raised by Stoford). Therefore, they shouldn't form part of the supply
Who raised the issue	Manse Opus and Sir Thomas Whire's Charity; Barberry Ansty Limited; Mountpark Logistics EU Sarl; Stoford Properties Ltd; SEGRO

No. raising the issue	5
Council response	<p>Paragraphs 3.49-3.53 of the Development Needs Topic Paper (SD11) provide the council's response to this point in relation to Crowner Fields Farm.</p> <p>The same applies to Padge Hall Farm. Stoford argue this should be removed from the supply because it is pre-let to a named occupier. The site is being developed for employment use. It therefore still meets strategic requirements; pre-let is very common with strategic units and units subject to pre-lets should not be discounted.</p> <p>Stoford's argument appears to be that only speculatively built units with no end user identified can count as part of the employment land supply. Units with identified occupiers should all be discounted. This would make monitoring a planning policy impossible.</p>

Issue	Allocated sites will not provide sufficient provision for B8 logistics development to meet regional market demand - sites 95 and 14 will not supply open B8 floorspace
Who raised the issue	SEGRO
No. raising the issue	1
Council response	This is a similar argument to the previous one. The local plan does not allocate sites based on their intended occupiers and whether they are 'open' or not. On the wider point, the level of land allocation proposed would meet the assessed strategic need for opportunity area 7.

Issue	Previously developed land and/or grey belt should be prioritised ahead of non-grey green belt sites
Who raised the issue	S&D Postlethwaite; Prologis UK Limited; BARJANE
No. raising the issue	3
Council response	<p>This point was considered in the Green Belt Exceptional Circumstances Topic Paper.</p> <p>Although claimed by site promoters to be grey belt, neither of the sites put forward by S&D Postlethwaite or BARJANE are in a part of the Green Belt defined as provisionally grey belt in the Stage 1 Green Belt study (GBD1).</p> <p>In relation to the point raised by Prologis, the fact that a relatively small part of a largely greenfield, green belt site is PDL while one relevant factor is not considered to be an overriding reason why that site should be prioritised.</p>

Issue	S7 is unsound because it allocates Green Belt sites, while other available, suitable and achievable sites are not allocated. Exceptional circumstances not demonstrated as all other reasonable alternatives not examined.
Who raised the issue	Mr N Williams and Miss E Williams the landowners of Land at Mill House, Dunchurch; CPRE; Stoford Properties Ltd; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising the issue	8
Council response	The council's position on Green Belt exceptional circumstances is set out in the Green Belt Exceptional Circumstances Topic Paper (document GB4). This document explains the thorough examination of reasonable alternatives that has been undertaken, including through the Sustainability Appraisal.

Issue	Policy not justified because of issues with the Strategic Transport Assessment modelling Toll Bar End and in consideration in SA growth scenario 2
Who raised the issue	Prologis UK Limited; Mountpark Logistics EU Sarl
No. raising the issue	2
Council response	<p>This is an issue raised by omission site promoters of the Ryton West site in relation to the consideration of that site in the Strategic Transport Assessment (STA). That site was identified as a preferred option as part of the Regulation 18 consultation but was omitted after the Strategic Transport Assessment identified significant impacts at the Toll Bar End junction.</p> <p>The site promoters' argument is that the impacts of the scheme on that junction should have been modelled using the Kenilworth and Southam Wide Area (KSWA) model rather than using the Rugby Rural Area Model (RRAM). They state that the KSWA better reflects the operation of Toll Bar End following recent changes as part of the Coventry Gateway South development.</p> <p>They argue that the Sustainability Appraisal report's consideration of the growth scenario including the Ryton West site should be amended to (amongst other things) score the site more positively for transport impact.</p> <p>In response to this comment the council has instructed SLR to consider the sites raised on behalf of Prologis and model the impact of the Ryton West omission site and the proposed allocation at Walsgrave Hill (as alternatives) in the KSWA model. The results of that are summarised in document I14. These results support the conclusions reached in the original STA and therefore the Sustainability Appraisal.</p>

Issue	Replacement for the overcalculated supply at Coventry Gateway South should be as close to Toll Bar End as possible
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Who raised the issue	Tarmac Trading Ltd
No. raising the issue	1
Council response	<p>The Alignment Paper Addendum (2025) corrected an error in the WMSESS in calculating the employment land supply at Coventry Gateway South (in Warwick District). The addendum recommended that an additional 50ha in supply in opportunity area 7 (M6 / A45 / A46 / M45 Coventry & Rugby).</p> <p>We disagree with this comment. It is important to remember that WMSESS need is derived from the WMSESS study area (i.e. most of the West Midlands region) as a whole, it is then indicatively apportioned by the WMSESS to individual opportunity areas. In this context, the individual location of sites within the opportunity areas is not a factor in the employment needs evidence base. Therefore, there is no particular reason why this need should be re-provided close to Toll Bar End.</p>

Issue	Allocation of employment sites doesn't align with policy S1 settlement hierarchy as it is not focussed on the town of Rugby. Allocations on edge of Coventry don't align with S1 statement there should be only limited development in countryside.
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The supporting text for Policy S1 at para 1.18 is clear that the Coventry urban fringe sits outside of the settlement hierarchy. The overarching strategy is summarised in paras 1.8-1.13 on pages 9-10 of the plan. Greater detail is set out in the Green Belt Exceptional Circumstance Topic Paper (GBD4). There is no misalignment.

Issue	In applying para 147-148 NPPF the council has wrongly given weight to the disadvantages of non-Green Belt options
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	Paragraphs 147-148 require, before concluding the exceptional circumstances exist to justify changes to Green Belt boundaries, the council to have examined fully all reasonable options. Paragraph 148 states that in reviewing Green Belt boundaries the need to promote sustainable patterns of development should determine whether a site's location is appropriate, and that "Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban

	<p>areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”.</p> <p>Although not explicitly stated in the NPPF, the council considers that fully examining reasonable non-Green Belt options would include looking at their advantages and disadvantages. Similarly, considering the consequences for sustainable development of channelling development towards locations beyond the outer Green Belt boundary requires consideration of the disadvantages of that option.</p> <p>As a more general point, the council considers that the disadvantages of non-Green Belt options can form part of the exceptional circumstances for Green Belt release.</p>
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Issue	Allocations on the edge of Coventry are unsustainable, and the allocations overconcentrate employment land on the edge of Coventry and this will be damaging to the economic prosperity of Rugby Town. Logistics-based clustering on the edge of Rugby should be favoured, this could also deliver B2.
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	<p>The council disagrees. For the reasons set out in the Green Belt Exceptional Circumstances Topic Paper (GBD4) the council considers the opposite to be true and that delivering a significant part of the requirement for employment land on the edge of Coventry is the most sustainable option.</p> <p>Given the allocations at Rugby in the plan (Coton Park East and South West Rugby) coupled with the proposal in the recently consulted on West Northamptonshire Loal Plan to deliver a phase IV of DIRFT with 106ha of employment development close to the edge of the town of Rugby, there will be no shortage of employment development at Rugby during the plan period. The large planned expansion of Magna Park Lutterworth (in Harborough District) should also be considered. As is explained in the topic paper, the opportunities for manufacturing and R&D uses are higher on the edge of Coventry than north of Rugby on the A5 which with DIRFT and Magna Park is a logistics focussed location.</p>

Issue	Allocations on the edge of Coventry to seek to deliver diversification beyond B8 contradict evidence base that shows greatest need is for B8. In any event diversification can be delivered elsewhere.
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council	WMSESS states that there should in opportunity area 7 be 2-3 larger B8/mixed sites of

response	<p>circa 50ha and 1-2 smaller B2/B1 sites of circa 25ha.</p> <p>It is therefore envisaged in the evidence sites that sites may be “mixed” and achieving that mix (i.e. diversification) is an objective of the plan and the council’s Economic Strategy (SD17).</p> <p>Accordingly, there is no contradiction.</p>
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4.71. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Include omission site	S&D Postlethwaite; Tarmac Trading Ltd; BARJANE; Catesby Estates; Windsor Developments (Site 145); Swanvale Developments Ltd; RBC Conservative Group; Mitchell, Stuart
Remove Green Belt allocation and replace it with non-Green Belt omission site.	Mr N Williams and Miss E Williams the landowners of Land at Mill House, Dunchurch
Allocate Site 17 for 130,000sqm of employment floorspace as was proposed at the Preferred Option stage.	Tritax Big Box Developments Ltd (Site 17)
Council response to modification proposals: The modifications proposed for this policy primarily relate to the combination of sites selected for allocation. This has been addressed under the main issues for S7 and for individual sites below.	

SITE 64 COTON PARK EAST

4.72. 52 representations on behalf of 641 people or organisations argued that the allocation of site 64 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	No clear need for this level of employment allocation - questions over validity of WMSESS, many warehouses are empty
Who raised the issue	Willis, Mark; Rugby Free Primary school; Cooper, Clive; Sandra, Sandra; Hinchliffe, Nick; Timms, Livia; Varma, Chaitanya; Coton Park residents group; Stuart, Laura; Allanach, Richard
No. raising the issue	560
Council response	This issue is essentially the questioning of the evidence base for Policy S3, and similar issues are raised in relation to that policy. The council, as it is required by national policy to do, has collected evidence of projected future need for employment land both at a local and sub-regional/regional level. This evidence is reflected in the level of employment in the submission local plan.

Issue	Loss of green open space with landscape and environmental impacts
Who raised the issue	Stephen, Hannah; Sandra, Sandra; Timms, Livia; Varma, Chaitanya; Rusgrove, Amanda; Coton Park residents group; Stuart, Laura; Sharma, Nishtha; Awotunde, Oladapo
No. raising the issue	559
Council response	<p>The site is currently undeveloped, but it is not public open space. The landscape and ecological sensitivity of the site was considered in the evidence base (see documents SS20-23 and SS25-27). The site was identified as having medium ecological constraints and medium/low landscape sensitivity.</p> <p>It is important to note that the site benefits from an extant outline planning permission for residential development and has been allocated for development since 2019.</p>

Issue	Impact on nearby residential properties - including noise, traffic, light and amenity. Insufficient consideration of co-locating incompatible land uses.
Who raised the issue	Rafe, Joanna; Cooper, Clive; Willin, Janice; Pritchard, Ryan; English, David; Clark, Dagmar; Hall, Gail; Twynholm, Gary; Ash, Lisa; Stephen, Hannah; Large, Claire; Sandra, Sandra; Hinchliffe, Nick; Huang, Wei; Timms, Livia; Ward, Steve; Smith, Jane; Jennings, Ross; Rusgrove, Amanda; Scott, Grant; Jenkins, Ellen; Twining, Carrie; Stuart, Laura; Campbell, Nicholas; Sharma, Nishtha; Devendar, Abhishekh; Fatania, Kalpesh; Tucker, Andrew; Awotunde, Oladapo; Page, Thomas; Vasudev, Divya; Clark, Peter; Dexter, Malcom; Allanach, Richard
No. raising the issue	35
Council response	The impact on neighbouring residential properties is specifically highlighted in the development requirements for the site. The design code to be prepared for the site would further consider this, as would the planning application process.

Issue	Highway impacts (congestion, safety and road condition) including the A426, M6 junction 1 and A5 Gibbets Cross with lack of mitigation strategy
Who raised the issue	Mehta, Lynne; Mehta, Kamalgupt; Rugby Free Primary school; Redhead-Holroyd, Thomas; Redhead-Holroyd, Jessica; Cooper, Clive; Naish, Murray; Coton Park East Committee; Twynholm, Gary; Stephen, Hannah; Timms, Livia; Varma, Chaitanya; Smith, Jane; Morris, Diane; Jennings, Ross; Coton Park residents group; Dixon, Chris; Scott, Grant; Sharma, Nishtha; Devendar, Abhishekh; Tucker, Andrew; Awotunde, Oladapo; Dexter, Malcom; Davis, Ian; O'Connell, Mark; Allanach, Richard
No. raising the issue	614
Council response	The extent of impacts at these junctions is considered in the Strategic Transport Assessment (STA documents I3-I6). Specific mitigations are identified in the STA.

	<p>Coton Park East has an existing residential allocation and permission and is therefore included in the 2042 local plan reference case (i.e. the STA baseline). Trips associated with this existing permission are removed from the 2042 local plan scenarios tested to avoid double counting.</p> <p>However, this does mean that this allocation is contributing little/no additional traffic in comparison to the baseline.</p>
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Issue	Lack of adequate strategic transport modelling for the area and/or STA is flawed because it assumes road schemes will come forward whose status is uncertain.
Who raised the issue	Devendar, Abhishek; Allanach, Richard
No. raising the issue	2
Council response	<p>This is a similar criticism to the previous issue. It is a criticism of the methodology of the Strategic Transport Assessment (STA documents I3-I6). A426/A5 Gibbet Hill and A426/A4071 Avon Mill are both identified as existing issues in the STA. In relation to the former, paragraph 7.18 of the STA states “At the A426/A5 Gibbet Hill junction the modelling predicts a 10% increase in traffic flows through this junction following the inclusion of the Local Plan (Regulation 19) sites. This increase has been minimised through the spatial strategy, which has omitted large sites that would have the largest impact on this junction. Despite this, a solution will clearly be required at this junction, however, given the existing nature of the impacts, and the distance from most developments being promoted through the plan, it is unlikely that this would be funded by the Local Plan sites.”. National Highways are developing a scheme for Gibbet Hill junction, although this remains at an early stage. The scale of any scheme mean it is unlikely to be fundable through s106.</p> <p>Avon Mill Roundabout is a similar existing problem, with a Warwickshire County Council (WCC) designed scheme for this junction.</p> <p>The specific criticism is that the STA ‘unconstrained’ these junctions (i.e. assumed delivery of a scheme at these junctions) to model the impact of the local plan proposed site allocations. This is considered by WCC, RBC and National Highways to be a reasonable modelling approach.</p> <p>Although the modelling assumes delivery of schemes, the spatial strategy as noted deliberately avoids exacerbating these existing issues.</p> <p>Coton Park East has an existing residential allocation and permission and is therefore included in the 2042 local plan reference case (i.e. the STA baseline). Trips associated with this existing permission are removed from the 2042 local plan scenarios tested to avoid double counting.</p> <p>However, this does mean that this allocation is contributing no/very little additional traffic in comparison to the baseline.</p>

Issue	HGV traffic, congestion, hazards, pollution and noise pose significant threat to safety and wellbeing of children attending Rugby Free Primary School
Who raised the issue	Rugby Free Primary school; Redhead-Holroyd, Thomas; Redhead-Holroyd, Jessica; Smith, Mike; Rewhorn, Colin; Naish, Murray; English, David; Twynholm, Gary; Stephen, Hannah; Sandra, Sandra; Hinchliffe, Nick; Huang, Wei; Timms, Livia; Ward, Steve; Smith, Jane; Rusgrove, Amanda; Coton Park residents group; Dixon, Chris; Coope, Neal; Stuart, Laura; Fatania, Kalpesh; Tucker, Andrew; Awotunde, Oladapo
No. raising the issue	573
Council response	The proposed development requirements for the site include that “Larger units which will be focussed away from the south western corner of the site shall be accessed from Castle Mound Way”. This requirement would avoid the risks of heavy traffic past the primary school. The proposal would represent an improvement in comparison to the extant residential planning permission under which the traffic from 475 houses would travel on Central Park Drive past the school.

Issue	The site should contribute to mitigation at Gibbet Hill junction
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The need for an upgrade to the A426/A5 Gibbet Hill roundabout is identified in the Strategic Transport Assessment which states at para 6.17 “Given the strategic nature of the A426/A5 Gibbet Hill roundabout, and the existing congestion issues at this location, it is not suggested that contributions from the Local Plan sites would necessarily be required to aid delivery. The analysis indicates that it is primarily an existing issue which will worsen over time to such an extent that a scheme will be triggered in any event. The relatively small increases in traffic flows arising from the local plan sites would be unlikely to trigger a step change in the conditions and/or justify individual mitigations. On the basis that a scheme here is likely to be triggered before the point at which the developments within the Plan start to come forward at a significant level.”

Issue	Potential for increased flood risk nearby because of the development of the site
Who raised the issue	Timms, Livia; Varma, Chaitanya; Coton Park residents group; Dixon, Chris; Awotunde, Oladapo
No. raising the issue	555
Council response	It is a requirement of both national policy and proposed Policy EN7 that development will (amongst other things) need to not increase flood risk elsewhere and, where possible, reduce flood risk overall. This would be assessed in detail at planning application stage

	through a site-specific flood risk assessment and drainage strategy. These would be reviewed and would need to be agreed by Warwickshire County Council as lead local flood authority.
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Issue	Unclear whether land for playing fields will be genuinely gifted to Rugby Free Primary School or would be required to be purchased from the landowner by the school for a price of £3 million.
Who raised the issue	Rugby Free Primary school; Smith, Mike; Rewhorn, Vicki; Naish, Murray; Sandra, Sandra; Hinchliffe, Nick; Timms, Livia; Stuart, Laura; Davis, Ian; O'Connell, Mark
No. raising the issue	10
Council response	The requirement would be for the transfer of the playing fields for a consideration of £1. The landowner is aware of this and has confirmed that it is willing to proceed on that basis.

Issue	The site is physically and operationally constrained. It cannot flexibly accommodate B2/B8 units and its employment capacity is overstated
Who raised the issue	BARJANE; Stoford Properties Ltd
No. raising the issue	2
Council response	The masterplanning of the site to date has been undertaken by developer Panattoni. A pre-application process is underway. The capacity figures are based on a credible analysis of constraints and developable areas and are not overstated.

Issue	The site will not be viable for delivery of small employment sites based on a recent marketing assessment
Who raised the issue	Richborough Commercial (M45 J1)
No. raising the issue	1
Council response	The site is promoted by a very large employment developer, Panattoni. The site requirements include provision of smaller employment units. As part of a wider mix of unit sizes on the site, there is no reason to consider that these units cannot be delivered in the plan period.

Issue	A design code is required to demonstrate development could be appropriate
Who raised	Dixon, Chris; Davis, Ian

the issue	
No. raising the issue	2
Council response	The development requirements require compliance with a design code which will be prepared.

Issue	A footpath network through the site should be proposed beyond the formal PROWs
Who raised the issue	Dixon, Chris
No. raising the issue	1
Council response	This is a detailed design matter that can be considered through the preparation of a design code for the site.

Issue	River Avon designated Local Wildlife Site runs through this allocation; this is an important wider blue corridor and habitat for important protected species.
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	This is correct. The watercourse that runs through the site is a tributary of the Avon. It will be important that the design of the development protects the LWS and guidance on this will be developed through the design code that is to be prepared.

Issue	Inclusion of this site for employment unsound as it undermines the plan led system (as it has previously been allocated for housing)
Who raised the issue	Mitchell, Stuart
No. raising the issue	1
Council response	<p>It is correct that the site was allocated for housing development in the Local Plan 2011-2031. In April 2023 the site secured outline planning permission for residential development of up to 475 homes but the site has not come forward. The site is now controlled by an employment developer (Panattoni) and has been promoted through the local plan process for employment use.</p> <p>National Policy in para 127(a) states that where the local planning authority considers that there is no reasonable prospect of a site coming forward for the use allocated in a</p>

	<p>plan “it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped)”.</p> <p>There is no conflict with the plan-led system as the proposed change is being made through a local plan.</p>
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Issue	Designation as employment land loses opportunity to create a school or community facility in the future - area is lacking in services for scale of housing
Who raised the issue	Awotunde, Oladapo
No. raising the issue	1
Council response	<p>Under Local Plan 2011-2031 Policy DS7 as part of the (then) residential allocation at Coton Park East an 8.5ha parcel of land was reserved for a period of 12-24 months from the date of Local Plan adoption to safeguard against the potential need for a secondary school. However, Policy DS7 states that “Secondary school provision for Coton Park East is to be provided off-site through the expansion of existing secondary schools in Rugby to which a financial contribution will be required to provide for the school places generated by the development and pupil transportation.”. The safeguarding of land for a school lapsed in June 2021 and the County Council did not seek to acquire the land. The evidence for the new local plan, see the Education Topic Paper (document I11), does not support the need for a new secondary school.</p> <p>Therefore, no currently live opportunity is lost.</p>

Issue	Includes potential Local Wildlife Site designations within the allocated site 'Gravel Works Pond and Marsh'
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	The potential local wildlife site is not shown on the latest local wildlife site mapping on Warwickshire County Council’s website. In any event a potential local wildlife site is a site that has not yet been surveyed. The site has been allocated for development since 2019.

4.73. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
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No access to the site from Central Park Drive - access limited to Castle Mound Way only (one suggestion of access from A5, 2 suggestions of access from M6)	Rugby Free Primary school; Naish, Murray; Twynholm, Gary; Stuart, Laura; Sharma, Nishtha; Devendar, Abhishekh
Any new bus route should not pass Rugby Free Primary School due to congestion blocking through access as some times of the day	Rugby Free Primary school
Review/revise back to a mixed use/residential allocation	Mehta, Lynne; Mehta, Kamalgupt; Cooper, Clive; English, David; Hinchliffe, Nick; Rusgrove, Amanda; Hassell, Eve; RBC Conservative Group; Jenkins, Ellen; Devendar, Abhishekh; Awotunde, Oladapo
Extending Central Park Drive to connect to the residential estate from the other side of the school would improve access and egress	Pritchard, Ryan
Safeguard the site for future secondary school use due to current lack of one in North Rugby	Timms, Livia; Awotunde, Oladapo; Page, Thomas
Buffer to be extended - suggestions of 100-150m and least 500m from residential homes rather than the 50m proposed. Buildings should be masked from view in all seasons by a natural buffer.	Timms, Livia; Sharma, Nishtha; O'Connell, Mark
Requirement to facilitate network of trails around the perimeter and green areas in the site and make them accessible. Great Central Walk should remain a rural walk.	Coton Park East Committee; O'Connell, Mark
Amendments to development requirements: -amend first requirement to allow for more flexible use of the school expansion land -amend second requirement to read "provision of at least 4000m2 of space" to increase flexibility -amend fifth requirement to clarify access arrangements and require access point(s) to be formed in a manner which acceptably limits any conflict between commercial traffic and school traffic but that two access points is not essential -Amend sixth requirement to support pedestrian and cycle link to the south but remove reference to bus link provision -Remove seventh requirement for a design code	Panattoni and AC Lloyd
Further investigations and mitigations for air quality impacts	Sharma, Nishtha
Removal of overnight lorry parking facility	Sharma, Nishtha
A full assessment of the wider road network should be undertaken to assess whether there is sufficient capacity to accommodate increased commercial traffic and the development should be subject to a Transport Plan. Flood Risk Assessment should be undertaken.	O'Connell, Mark
If not deleted, require structural landscaping and a buffer on the eastern margin of the site to protect the Great Central Railway LNS and prevent coalescence with Newton.	Allanach, Richard

Council response to modification proposals: This site is not demonstrably available for residential development and is now being promoted and allocated for employment uses instead, which is supported by NPPF 127(a). It is therefore not appropriate to remove the overnight lorry parking facility.

This is not justification for safeguarding land for a secondary school – the Education Topic Paper (I11) notes that a secondary school in the north of Rugby is not currently required and demand can be accommodated through expansion of The Avon Valley School and other schools.

The access arrangements now require larger units, located furthest away from residential areas, to be accessed from Castle Mound Way which will minimise heavy goods traffic past the school. Access from the A5 would cross significant areas of third party land and access directly from the M6 would not be realistic.

The development requirements are designed to ensure a high-quality and sustainable outcome at this site which is sensitive to surrounding uses. Introducing further flexibility to the requirements risks a poorer outcome, particularly in regard to access routes. A design code is being prepared for the site which will set out more detailed requirements for access, buffers and landscaping.

SITE 17 SOUTH WEST RUGBY EMPLOYMENT PHASE 2

4.74. Five representations on behalf of 889 people or organisations argued that the allocation of site 17 is unsound. The following main issues were raised with this site allocation:

Issue	Welcome the reduction of scale of development proposed on this site, but still have concerns about the impacts of warehouses which should be discussed through the examination.
Who raised the issue	Action for Dunchurch; Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
No. raising the issue	886
Council response	The scale of developable area and floorspace allocated has been significantly reduced in comparison to the preferred options consultation from 130,000sqm to 60,000sqm to reduce impacts on Cawston Spinney and acknowledge elevated landscape sensitivity in the northeastern area of the site. The development requirements include tree lining to the west and south along the Potsford Dam Link Road and a 23ha country park as a buffer with the spinney. The proposal will also need to accord with the South West Rugby Design Code SPD.

Issue	Designation of a larger area for a country park rather than being safeguarded limits the potential for future development of the area not allocated for employment. Residential/mixed use development in the north close to the Spinney is more compatible in terms of landscape impact than employment development
Who raised the issue	Homes England; Taylor Wimpey Strategic Land

No. raising the issue	2
Council response	Developing the area currently designated for country park for residential does not represent a sustainable pattern of development. The housing would be sandwiched between an employment development and the Cawston Spinney ancient woodland with limited options for active travel or integration within the wider South West Rugby SUE. The creation of a country park will reduce landscape harms and ecological harms of the employment proposal and provide public benefit.

Issue	Transport impacts have not been sufficiently evidenced or mitigated
Who raised the issue	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch; Allanach, Richard
No. raising the issue	3
Council response	<p>The Strategic Transport Assessment (I5) modelled the impacts of this proposal on the strategic road network and identified a need for improvement schemes at A4071/B4112 Newbold Road roundabout and the A4071 Potsford Dam Roundabout. A sensitivity test (document I6) confirmed the continuing need for this mitigation with the reduced floorspace at South West Rugby in comparison with the preferred options consultation document.</p> <p>Overall, the transport modelling of the site is considered to be adequate to provide a proportionate evidence base.</p>

Issue	The Strategic Transport Assessment (STA) underestimates the congestion this allocation will cause and overestimates the modal shift which could be achieved in mitigation.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	<p>The respondent argues that the STA overestimates the modal shift to bus travel (from 9% to 14%) and the modal shift to walking and cycling (from 10% and 16% respectively to 13.5% and 21.5% respectively). Respondent argues that the existing modal share figures are based on a small sample survey and are higher than census 2021 travel to work data would suggest.</p> <p>The STA modal shift assumption borough-wide equates to a reduction of 1000 out of 47,000 vehicle + trips in an hour. This is reasonable when considering the level of intervention proposed by enabling Bus Service Improvement Plan (BSIP) and Local Cycling and Walking Infrastructure Plan (LCWIP) to come forward. This modal shift assumption also omits the potential benefits of localised interventions which will also accompany the developments as they progress through planning.</p>

The STA only proposes an increase in walking and cycling trips of 4% for journeys under 5km. For buses an increase of 5% against today's figures is targeted, again this is limited to journeys under 10km.

In both instances, the effect only occurs if the trips can reasonably be intercepted (i.e. they are within 400m of proposed enhancements and/or can tie into those proposed enhancements). These aren't sweeping reductions, they are targeted based on the fact feasible measures exist that could come forward based on Warwickshire County Council's ambitions to improve the walking, cycling and bus networks.

The biggest adjustment in a single hour is approx. -2.29% vehicle when all measures are included (the lowest is 1.42%). There are not very significant in the context of total traffic demand within the model. The model sees predicted increases in traffic levels of over 2% per annum (22% to 24% in total).

The evidence allows for the measures identified within the BSIP and the LCWIP to achieve the policy targets based on the assumption that the origin and destination are within the respective distances and there is a means of travelling a different way which can be delivered in a particular area. If these solutions do not exist, no shift is achieved. This is why the STA goes into detail to identify what measures each development would depend upon to enable the shift to happen. It is about future infrastructure being provided to enable real choice in travel to be available to all users of the transport network. The measures and the shift are intrinsic, if we were unable to secure contributions towards (and delivery of) the proposed schemes then the shift would not occur, that is the crux of the council's case.

Of course, could still be argued that a reduction of less than 2% in driver trips across the network it is too ambitious, that the council should assess what happens if the shift is not delivered. But this is contrary to NPPF as it does not present a vision led scenario, it would be very much predict and provide. Furthermore, if we were to assess the effects on the network of congestion without mode shift, we would then be dependent entirely on a highway capacity infrastructure strategy.

Furthermore, significant highway schemes are still required even after mode shift has been accounted for, so it doesn't really stand that the STA has suppressed congestion given a significant need for strategic highway schemes is still identified

Without a local plan the council would not have the evidence to demonstrate how the contributions to schemes beyond highway capacity are needed and can be secured against the developments. Development would still in such circumstances occur but without a means to deliver a comprehensive strategy to manage the traffic growth so the outcome would be much worse.

Finally on this issue, site 17 is particularly well placed to deliver modal shift given its location within the South West Rugby development and therefore its ability to benefit from the package of sustainable transport measures required as part of that urban extension.

Issue	The WMSESS places the A45/M45/B4429 junction in the bottom half of all strategic road junctions surveyed, showing that this is a poor location for warehousing.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	<p>All but one junction in opportunity area 7 (M6/A45/A46 M45 Coventry & Rugby) was identified in the WMSESS (SD4) as in the bottom 50% scoring junctions within the West Midlands. Junction scores are in table 11.3 on pages 164-168 of the WMSESS. The A45/M45/B4429 junction isn't scored in that table, and the reason is provided in Table 11.1 on page 155 (see also Appendix A9 of the study) as "no land parcel" i.e. a land parcel of over 25ha hadn't been identified. This is probably the case because the safeguarded land is within the South West Rugby allocation.</p> <p>Therefore, nothing can be inferred about the suitability of the junction from the WMSESS because it wasn't scored. The next closest junction, M45/B4429/Daventry Road was scored in table 11.3. This shows that junction as actually scoring higher than other junctions close to the town of Rugby, but less well than junctions on the edge of Coventry.</p> <p>Although relevant, the WMSESS never intended to provide a comprehensive assessment of the suitability for development of specific sites or locations. This was always made clear in the study to be the job of local plans.</p> <p>The respondent argues the location of the site is poor because northbound routing of commercial vehicles would go through Rugby.</p> <p>It is correct that northbound traffic would route on the A4071. However, this would equally be true for residential traffic from the site were it developed for housing. The site was safeguarded in the 2011-2031 for future development and lies within the South West Rugby strategic urban extension and so there isn't a realistic scenario in which it is not developed at all.</p>

Issue	There are issues with three critical junctions that traffic from the site would use, yet none of them have improvement works scheduled with any certainty.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	<p>The junctions are A426/A4071 Avon Mill, A426/Boughton Road Roundabout and A426/A5 Gibbet Hill. Traffic heading north or east would need to pass through or be affected by congestion from these roundabouts.</p> <p>The response notes that the STA report identifies that funding for the Avon Mill and</p>

	<p>Boughton Road Roundabout schemes is uncertain while this is equally the case for Gibbet Hill. The STA shows these schemes as being needed before the local plan allocations are developed.</p> <p>The respondent notes that an employment omission site north of Houlton was not advanced partly because of its reliance on/impact on the Gibbet Hill junction and argues the same should apply to South West Rugby.</p> <p>However, the additional volumes of traffic that would use the Gibbet Hill junction differs significantly between the North of Houlton scheme and South West Rugby. Figure 66 in the original Strategic Transport Assessment (document I3) shows for North of Houlton an AM development flow of 300-400 vehicles southbound from Gibbet Hill and 200-300 vehicles northbound to it from each of the A5 and A426 approaches. By contrast the equivalent trip distribution diagram for the South West Rugby scheme (Figure 2 of document I6) shows 0-50 vehicles routing each way through Gibbet Hill, this remains the case even if a higher quantum of floorspace is delivered (trip assignment diagram on page 85 of document I5).</p> <p>Therefore, the magnitude of impact at Gibbet Hill is very different.</p> <p>Overall, the view taken by the Council is that the absence of certainty over delivery of the three mitigation schemes to address existing impacts doesn't create a defensible basis for a moratorium on the allocation of further development land at Rugby. It would be particularly unlikely to justify the non-allocation of South West Rugby given that it was previously identified as suitable for future development and safeguarded for that purpose in the Local Plan 2011-2031.</p> <p>However, the existing traffic issues, particularly at Gibbet Hill, have influenced decisions about the scale and location of growth at Rugby. In that context, South West Rugby is one of the better locations for new development at the town.</p>
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Issue	Plan can meet its assessed need without allocating safeguarded land
Who raised the issue	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch; Allanach, Richard
No. raising the issue	3
Council response	This is not correct. The level of land proposed to be allocated in the plan is needed to meet assessed development needs and make a contribution to meeting the unmet local need of Coventry.

Issue	The site has not been evaluated for potential housing, despite this step being promised during the 2018 plan examination.
Who raised the issue	Allanach, Richard

No. raising the issue	1
Council response	<p>It is true the site was safeguarded for employment or residential development. The respondent notes that the landowner has pursued applications for housing elsewhere on the site with the intention of disposing of the land to housebuilders.</p> <p>The land is owned and promoted by Tritax Big Box Developments Ltd who submitted it for employment development in the Call for Sites and have submitted a planning application for employment use.</p> <p>The council considers that in these circumstances its ability to demonstrate that the land is available for residential development and achievable as a residential site is highly questionable.</p>

Issue	Reduction of the floorspace allocated is unjustified by evidence and is inconsistent with national policies on making effective use of land and prioritising non-Green Belt sites.
Who raised the issue	Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	1
Council response	<p>This was also raised as an objection to Policy S7. The reduction in floor space has been informed by up to date landscape evidence, namely the Area of South West Rugby Landscape Sensitivity Assessment January 2026 (SS24) which identified the northern areas of the site closer to Cawston Spinney as having high sensitivity to commercial development with medium and low sensitivity towards the southern half of the site. The report notes the role of this land in protecting the ecological and landscape integrity of the spinney.</p> <p>Given the reason for the reduction in floorspace, this remains consistent with the national policies cited.</p>

Issue	Reducing the developable area of the safeguarded land has direct implications for the funding and delivery of associated strategic infrastructure including S9 Potsford Dam Link Road
Who raised the issue	Homes England; Taylor Wimpey Strategic Land; Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	3
Council response	<p>This refers to the reduction of floorspace proposed on site 17 between the preferred options and proposed submission versions of the emerging local plan.</p> <p>The delivery of the spine road network was planned to take place without any</p>

	development of the safeguarded land (site 17). The South West Rugby Masterplan SPD and its strategic infrastructure schedule (Appendix K) make no assumption of contributions from the safeguarded land. Therefore, delivery of the spine road network is not contingent upon achieving a target level of floorspace on site 17.
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Issue	Concern regarding the site directly adjoining Cawston Spinney Local Wildlife Site and ancient woodland, potential harm to wildlife and landscape.
Who raised the issue	Warwickshire Wildlife Trust; Allanach, Richard
No. raising the issue	2
Council response	<p>In relation to landscape impact, the respondent notes the comments on the sensitivity of the site in 2017 Warwickshire County Council landscape study which said the site was inappropriate for commercial development.</p> <p>The respondent also notes the more recent landscape study (document SS24) and argues the proposed allocation conflicts with it because the proposed development area cuts across field boundaries.</p> <p>The revised proposal and reduced floorspace proposed (in compared to the preferred options) directly respond to the landscape evidence by pulling development back from the Spinney to deliver a more significant public open space buffer.</p> <p>The respondents note the proximity of the site to the ancient woodland and its vulnerability to changes in air quality, surface water quality and hydrological regime. Together with the potential for recreational impacts and lighting and noise from employment land effecting birds.</p> <p>The site was subject to an Ecological Constraints Assessment (SS25) which concluded that there were medium constraints at the site but that it had potential to be taken forward for development subject to appropriate mitigation measures and sensitive site design. As noted above, the developable area has been significantly reduced from 130,000sqm to 60,000sqm at Regulation 19 which will allow for a significant buffer between the built area and the Cawston Spinney. There will be further ecological assessment at application stage and the site design will need to ensure no adverse effects on the spinney (or Draycote Meadows SSSI)</p>

4.75. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
23ha of public open space should be reduced in line with the Preferred Options allocation and the non-developed land	Homes England; Taylor Wimpey Strategic Land

safeguarded for housing or other compatible uses	
Add development requirement for lighting strategy with input from ecologist to minimise harm to wildlife	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Amend development requirement on public rights of way to replace 'are pleasant to use' with 'retain the character of the surrounding area'	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Change 'may' to 'shall' in final two development requirements seeking contributions to two road schemes	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Add a requirement for the development to have the same traffic management scheme which prevents HGVs from Symmetry Park moving through Dunchurch crossroad.	Allanach, Richard
<p>Council response to modification proposals: The developable area has been reduced in line with the latest landscape evidence (Area of South West Rugby Landscape Sensitivity Assessment January 2026 – SS24) – public open space is felt to be the most appropriate use for this land in terms of landscape impact and ensuring sustainable patterns of development.</p> <p>The development requirements are designed to ensure a high-quality and sustainable outcome at this site with regard to the surrounding area, while also allowing for details to confirmed at a later stage in the process. The specific contributions and mitigation measures required by the site will be determined at application stage. The council does not therefore consider that the modifications are required to address issues of soundness.</p>	

SITE 14 NORTH OF ANSTY PARK

4.76. Six representations on behalf of six people or organisations argued that the allocation of site 14 is unsound. The following main issues were raised with this site allocation:

Issue	Site has poor access by sustainable transport modes and therefore doesn't represent a sustainable pattern of development contrary to NPPF para 148
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	<p>The development requirements ensure the site will have pedestrian links to the Central Boulevard of Ansty Park which is served by bus routes to both Coventry and Rugby. The site is likely to benefit from the future Very Light Rail service from Coventry which is intended to terminate in this area.</p> <p>Overall, the site is proximate to its workforce and benefits from good sustainable transport links with potential for transformative improvement.</p>

Issue	Gradual encroachment of Ansty Park onto rural land, harming landscape and rural setting
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	for nearby residents on Nettle Hill
Who raised the issue	Combe Fields Parish Council
No. raising the issue	1
Council response	There is a requirement for the council to identify further employment sites and supporting the development of a cluster at the existing Ansty Park will enable pooling of facilities, more efficient use of land and help diversify the Borough's economy. The Landscape Sensitivity Assessment for larger sites (SS20) found the site had low sensitivity.

Issue	Instant mature tree screening needed along Combe Fields Road and the B4029 to mitigate impacts
Who raised the issue	Combe Fields Parish Council
No. raising the issue	1
Council response	The development requirements include a managed, high-quality landscaped environment. This will include screening although the exact details would be determined at application stage.

Issue	Release of Green Belt land will have an urbanising effect and contribute to urban sprawl
Who raised the issue	Parsons, Chris
No. raising the issue	1
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. It states that allocating employment land on the edge of Coventry and specifically at Ansty Park will help to diversify employment opportunities in the Borough, support agglomeration and clustering at existing hubs and reduce commuting times from Coventry. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt.

Issue	Site should have been assessed in stage 2 Green Belt study
Who raised the issue	Stoford Properties Ltd
No. raising	1

the issue	
Council response	The Stage 2 Green Belt Contribution Study (GBD2) looked at sites which had not been provisionally identified as grey belt. This site was identified as grey belt in the Green Belt Contribution Study (GBD1). This is a proportionate approach. It was considered unlikely that this site would, based on a site-specific stage 2 study, be reclassified as non-grey belt Green Belt.

Issue	Site would be difficult to deliver and fund if restricted to E(g)(ii)/E(g)(iii)/B2 uses, because regional occupier demand is dominated by B8 logistics uses.
Who raised the issue	Manse Opus and Sir Thomas Whire's Charity; BARJANE
No. raising the issue	2
Council response	<p>Manse Opus have succeeded on delivering the adjoining Ansty Park which was subject to a similar restriction. There is no clear evidence that manufacturing, research and development and light industrial uses are undeliverable in this location.</p> <p>The site was promoted for B2, light industrial and R&D uses prior to the Reg 19 consultation. The site responds to the advice in the West Midlands Strategic Employment Sites Study (document SD4) on the need to allocate sites of circa 25ha specifically for industrial and R&D uses rather than warehousing. This is also needed to accord with the plan's objectives and those of the council's Economic Strategy (document SD17). An extension to Ansty Park is the best location in the borough for delivering these uses because it allows for the further growth of an existing cluster of advanced manufacturing and R&D facilities in this location.</p>

4.77. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Add in flexibility to use class requirements for the site, allowing up to 50% of the floorspace to be used for class B8	Manse Opus and Sir Thomas White's Charity
Amend policy to require tree screening/landscape buffer along Combe Fields Road	Combe Fields Parish Council; Manse Opus and Sir Thomas White's Charity
Make clear that access is not via Combe Fields Road	Warwickshire County Council
Requirement for contributions to public transport	Warwickshire County Council
<p>Council response to modification proposals: The council does not support a modification to allow 50% B8 use for the reasons explained above.</p> <p>The development requirements state that vehicular access is to be through Ansty Park. Specific contributions required, as well as highways and landscaping considerations will be addressed in more detail at application stage.</p>	

No modifications are needed to address issues of soundness.

SITE 95 CROWNER FIELDS FARM AND HOME FARM, ANSTY

4.78. Six representations on behalf of six people or organisations argued that the allocation of site 95 is unsound. The following main issues were raised with this site allocation:

Issue	Development requirements do not account for the overhead power line and two pylons that are present
Who raised the issue	National Grid Electricity Distribution
No. raising the issue	1
Council response	This site now has planning permission R23/1027 which includes diversion of the existing overhead powerlines which cross the site.

Issue	Loss of Green Belt land unacceptable - Release of this land will have an urbanising effect and contribute to urban sprawl
Who raised the issue	Parsons, Chris; Foss, Jeremy
No. raising the issue	2
Council response	<p>The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the justification for releasing employment sites from the Green Belt. It states that allocating employment land on the edge of Coventry and specifically in proximity to Ansty Park will help to diversify employment opportunities in the Borough, support agglomeration and clustering at existing hubs and reduce commuting times from Coventry.</p> <p>This site now has planning permission R23/1027 and will be released from the Green Belt to ensure it is able to come forward in line with other allocation sites and existing industrial areas.</p>

Issue	Site has poor access by sustainable transport modes and therefore doesn't represent sustainable pattern of development contrary to NPPF para 148
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council	We disagree. The site is close to Coventry and access by bicycle can be created in line

response	with the development requirements. The site has planning permission and this includes a sustainable transport package including bus service improvements.
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Issue	Development requirements are overly prescriptive regarding delivery of specific quantum of open space corridors
Who raised the issue	Frasers Group
No. raising the issue	1
Council response	The development requirements reflect the provisions of the extant planning permission for the site which was granted based on a very special circumstances case. There is a need for prescriptive requirements to avoid diminution of open space provision in comparison to that permission.

Issue	Traffic modelling is too focused on junctions and strategic roads without considering real-world use of cut-through routes through rural villages.
Who raised the issue	Connell, Mike; Foss, Jeremy
No. raising the issue	2
Council response	The Strategic Transport Assessment models likely trip generation and distribution. This assesses impact on the network and identifies where issues would arise. In relation to the issue of inappropriate routing of commercial vehicles on rural roads, the planning permission includes a condition in relation to freight management to ensure HGV's are not using the secondary access and routing through villages.

Issue	Proposal will have significant adverse impacts on air quality in the surrounding area including Shilton with no sufficient mitigations in place to prevent HGV traffic flows through villages
Who raised the issue	Connell, Mike; Foss, Jeremy
No. raising the issue	2
Council response	The site has a detailed planning permission and this was supported by an environmental impact assessment. The environmental statement included air quality chapters which considered the air quality effects of the development both during construction and post-occupation. The summary of the post-occupation assessment in the officer's report to committee states as follows:

	<p>“The AQC’s [Air Quality Chapters] consider the potential effects of the completed development. They conclude that air quality conditions for future users of the development would be acceptable. Concentrations would be well below air quality objectives throughout the site. Furthermore, they demonstrate that pollutant concentrations would be well below objectives at all existing receptors in 2030 with or without the development. Emissions from the additional traffic generated by the development would have a negligible (not significant) impact on air quality conditions at all existing receptors along the local road network. This relies on mitigation such as active and sustainable transport options being provided and utilised to achieve a modal shift.”.</p> <p>Overall it is concluded that the proposed development would not have a significant impact on air quality.</p>
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Issue	Loss of arable land should not be permitted due to the need for food security in current global political situation
Who raised the issue	Foss, Jeremy
No. raising the issue	1
Council response	This was an issue considered in determining the planning application for the site.

4.79. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Insert a requirement for the masterplanning of the development to account for the overhead power line, enabling it to remain in situ.	National Grid Electricity Distribution
Insert a requirement for mitigatory measures and traffic re-routing to minimise impacts on nearby villages such as Shilton	Connell, Mike
Further specific assessments of HGV and diversionary traffic impacts to surrounding villages such as Shilton	Connell, Mike
Requirement for open space corridors should not specify the hectarage, only that sufficient open space is needed	Frasers Group
Council response to modification proposals: For the reasons explained above, these modifications are not supported by the council.	

SITE 121 LAND AT WALSGRAVE HILL

4.80. 11 representations on behalf of 117 people or organisations argued that the allocation of site 121 is unsound. The following main issues were raised with this site allocation:

Issue	Combination of gypsy and traveller accommodation, recreational space, lorry park, industrial buildings and a blue light route is unsound as needs of these will be in constant conflict.
Who raised the issue	Combe Fields Parish Council
No. raising the issue	1
Council response	<p>There is no conflict between the blue light route and industrial use of the wider site. Indeed, at Regulation 18 stage University Hospitals Coventry and Warwickshire NHS Trust responded in support of the allocation of the site based on its ability to deliver the blue light route.</p> <p>The site is 201.8ha in areas and would deliver 290,000sqm of floorspace at a plot ratio of 0.14 (i.e. only 14% of the site would be used for the footprint of industrial buildings). When site roads and car parking is factored in the proportion of the site built on would be higher, but nonetheless a large part of the site would be used for green space. This also creates an opportunity for the provision of Gypsy and Traveller pitches on a modest scale, as proposed. This would not conflict with the proposed employment use. The location is close to the edge of Coventry with new walking and cycling routes proposed and potential for very light rail. This would be a suitable location for new pitches.</p>

Issue	Development of large B2 and B8 use buildings will harm the setting of Coombe Abbey RPG which is not sufficiently mitigated by the measures proposed in the development requirements.
Who raised the issue	Historic England; Ansty Parish Council; Prologis UK Limited; Mountpark Logistics EU Sarl; Stoford Properties Ltd; Allanach, Richard
No. raising the issue	6
Council response	<p>The response to the Regulation 19 consultation from Historic England objected to the proposed allocation. Since the close of the consultation the site promoters have undertaken further work including zone of theoretical visibility mapping, production of verified views and creation of a landscape strategy (these are provided as documents WH1 and WH2). On the basis of this new material an updated heritage assessment has been prepared for the council by its consultant Node (document WH3). Meetings to consider this issue have been held with Historic England.</p> <p>A draft statement of common ground is submitted (document SOCG10) which sets out the council's position in relation to Historic England's objection to this site. Historic England have advised that they require more time to formulate their position in response to the new material and an updated SOCG including this will be submitted as soon as possible.</p>

Issue	Sustainability Appraisal ranks site 121 lowest of the options for historic environment impact but gives greater commentary on the heritage impacts of Scenario 3 North of Houlton site. HE disagrees with its appraisal of the site as having 'good potential to avoid and mitigate impacts'
Who raised the issue	Historic England
No. raising the issue	1
Council response	The Sustainability Appraisal is necessarily based on the information available to the consultants at the time of writing. The council considers that there is mitigation potential and accordingly there was no error in the Sustainability Appraisal. The Council's updated position on the scope for mitigation is set out in document WH3.

Issue	The allocation of Site 121 is unsound because its development requirements do not include any locational requirements for the proposed G&T pitches. Also inclusion of G&T site not fully justified when there are no G&T allocations in similar sites close to Rugby town, which is the most sustainable location.
Who raised the issue	Manse Opus and Rolls Royce Plc; Timms, Heather
No. raising the issue	3
Council response	<p>The exact location of pitches within the site will be determined at planning application stage. This is an acceptable approach in plan making.</p> <p>The new employment sites allocated at Rugby are at South West Rugby and Coton Park East. Both of these sites are significantly smaller than Walsgrave Hill. The latter is 201.8ha in area compared to 40.7ha at South West Rugby and 35.97ha at Coton park East. The larger site size presents an opportunity to include Gypsy and Traveller pitches without difficult relationships with neighbouring employment units.</p> <p>Overall, as set out in the Green Belt Exceptional Circumstances Topic Paper (GBD4), there were not opportunities to locate the pitches at Rugby instead.</p>

Issue	Site is not in a sustainable location and therefore its allocation is contrary to national policy. In particular, site has poor access by sustainable transport modes and therefore doesn't represent sustainable pattern of development contrary to NPPF para 148.
Who raised the issue	Ansty Parish Council; Allanach, Richard; Stoford Properties Ltd
No. raising the issue	3

Council response	<p>Mr Allanach argues that the proposal would be poorly aligned with the available road infrastructure citing predicted queue impacts at M6 J2 and Toll Bar End roundabout. He also argues that modal shift to public transport, walking and cycling is overestimated in the Strategic Transport Assessment. The council's response to the latter point is included in the issues raised for site 17 South West Rugby and is not repeated here.</p> <p>In relation to congestion at M6J2 and Toll Bar End, accommodating the necessary large level of employment land at any location on the strategic road network (SRN) in the borough is going to generate traffic movements and create impacts on the SRN. In this context, the scale of impacts created by this site is shown in the Strategic Transport Assessment to be less than many of the reasonable alternative sites. Overall, National Highways response confirms no significant concerns in relation to the impact.</p> <p>On the question of the wider sustainability of the site: (1) it is on the edge of Coventry the largest by far centre of population in the functional economic market area, likely reducing commute distances (2) circa 700 new homes are planned on the opposite site the A46 and the site would be linked to them by a new walking and cycling route.</p>
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Issue	Exceptional circumstances for the release of Green Belt have not been adequately demonstrated, and suitable non-Green Belt options have not been exhausted.
Who raised the issue	Ansty Parish Council; Parsons, Chris; Timms, Heather; Stoford Properties Ltd; Mitchell, Stuart; Allanach, Richard
No. raising the issue	6
Council response	This issue is raised in relation to Policy S7. The council's exceptional circumstances case is set out in the topic paper (document GBD4).

Issue	Development will cause unacceptable harm to biodiversity and/or landscape
Who raised the issue	Ansty Parish Council; Mountpark Logistics EU Sarl; Stoford Properties Ltd; Allanach, Richard
No. raising the issue	4
Council response	<p>The council's evidence (documents SS25 and SS27) identifies that site has high ecological constraints owing principally to proximity to Coombe Pool SSSI. Mitigation proposals have been identified including a landscape buffer, retention of habitat features and significant new habitat creation as part of a high on-site BNG likely to be >50%. However, further technical studies are needed including a hydrological assessment, detailed air quality assessment, and noise, lighting and visual assessments. Such assessments will need to be prepared and to inform site design and the mitigation strategy at planning application stage.</p> <p>The landscape evidence prepared (documents SS20 and SS21) shows, factoring in mitigation proposed, the site to have medium/low landscape sensitivity. The post-</p>

	<p>mitigation assessment (SS21) concludes “Although the development has potential to alter views from sensitive receptors, the large-scale extension proposed for the country park is likely to offer high levels of mitigation, in the form of benefits for recreation and biodiversity.”.</p> <p>Overall, the site would not cause unacceptable biodiversity or landscape harm.</p>
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Issue	Site was not allocated in last local plan because of proximity to an SSSI & heritage assets, and lack of exceptional circumstances for Green Belt release
Who raised the issue	Timms, Heather; RBC Conservative Group; Allanach, Richard
No. raising the issue	18
Council response	<p>The position on Green Belt exceptional circumstances can change over time, as it is dependent on the scale of need to be planned for and the alternative options available. Therefore, conclusions made about in exceptional circumstances in 2018 do not hold in 2026.</p> <p>Heritage and ecology are raised as separate issues above. The development proposed in 2018 and before was a residential development.</p>

Issue	Delivers materially less floorspace than the strategic site it replaced which is not otherwise accounted for
Who raised the issue	BARJANE
No. raising the issue	1
Council response	<p>This comment refers to a change made between the Regulation 18 preferred options stage, in which land west of Ryton on Dunsmore (Prologis Park West and Mountpark) was proposed as an allocation and the proposed submission plan in which this allocation was replaced with land at Walsgrave Hill.</p> <p>The supply position in the Regulation 18 consultation document is not directly comparable with the proposed submission plan as it was based on a different plan period (2024-2045 compared to 2025-2042). Additionally the monitoring position moved on by a year and the HEDNA-WMSESS Alignment Paper Addendum (SD6) was prepared with adjustments to need figures.</p> <p>The council considers that the proposed submission local plan puts forward sufficient supply to meet assessed needs.</p>

Issue	Site added at reg 19 stage therefore requirement for public engagement not adequately
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	met
Who raised the issue	Timms, Heather; Case, Paul
No. raising the issue	2
Council response	This comment is a reference to the site not being identified as a preferred option as part of the second Regulation 18 consultation. At that stage it was instead identified as a reasonable alternative. Holding a second regulation 18 consultation is effectively an optional step under The Town and Country Planning (Local Planning) (England) Regulations 2012. The plan has been prepared in accordance with the regulations and with the Statement of Community Involvement (document CD16). Adequate public engagement has been undertaken.

Issue	Very light rail isn't funded and so shouldn't be taken into account
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	It is correct that very light rail is not yet funded, and the route is not confirmed. However, it is an aspiration of Coventry City Council to create a route linking Ansty Park with the city centre and as set out in the statement of common ground with Coventry City Council (SOCG2) the city council support the safeguarding of such a route. Therefore, the council's position is that it is reasonable to take this opportunity into account in considering the site.

Issue	Site is in the middle of the green belt and, if built, will reduce the distance between Coventry and Rugby
Who raised the issue	RBC Conservative Group
No. raising the issue	16
Council response	<p>The site is within the Green Belt and its contribution to Green Belt purposes is considered in the evidence base (documents GBD1-2). The council's exceptional circumstances case is set out in the topic paper (document GBD4).</p> <p>The level 2 Green Belt assessment (GBD2) identifies that the parcel lies in a robust gap of almost 10km between Rugby and Coventry and that the site forms a small part of the gap and that its development would have a minor impact on the visual separation between the towns. Overall, the site is identified as having a moderate contribution to the purpose of</p>

	preventing neighbouring towns from merging.
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Issue	Location on the edge of Coventry means that a proportion of the economic benefits would be drawn away from Rugby.
Who raised the issue	Mitchell, Stuart
No. raising the issue	1
Council response	<p>This site is on the edge of Coventry. However, it lies within the same functional economic market area and housing market area as does Rugby and so some of the jobs created would benefit Rugby residents. The interconnectedness of the area also means that residents of the town of Rugby benefit from the economic growth in the borough.</p> <p>Given the need for employment land is part regionally/sub-regionally derived it would not be sustainable to seek to accommodate all this new employment land at Rugby.</p>

Issue	Allocation of this site is not needed to meet employment land needs which have been overestimated by the Council.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	This comment relates principally to Policy S3 under which the council has responded to similar comments.

Issue	Allocation will not foster diversification of Rugby's economy.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	<p>The respondent argues that Rugby's economy is already over-weight in logistics citing page 17 of the 2022 HEDNA. He also argues that more big boxes will not diversity employment but further concentrate it into logistics.</p> <p>The council acknowledges the dominance of logistics in recent development at the town of Rugby, but notes at Ansty Park and Prologis Park Ryton development has been more mixed with B2 and research and development uses in addition to B8. The location of this site adjacent Ansty Park and the proposed mix of different unit sizes gives the potential to deliver a similar mix of uses.</p>

4.81. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Failing the removal of the site, recommended that two parcels of 'developable area' to the west of the RPG are removed to result in a smaller site to the north and a green buffer	Historic England
Further explanation of potential heritage impacts of the site required in the SA	Historic England
Site should be removed or at least substantially reduced	Mitchell, Stuart; Allanach, Richard
If the allocation is not deleted, then add a requirement for a buffer or at least 500m between new development and the Coombe Pool SSSI.	Allanach, Richard
<p>Council response to modification proposals:</p> <p>The council's current position in relation to Historic England's comments is set out in the statement of common ground. Historic England's updated position is awaited and will be submitted as part of a signed statement of common ground.</p> <p>The council does not support the removal or reduction of the site nor the specification of the proposed buffer distance,</p>	

POLICY S8 SOUTH WEST RUGBY

4.82. Five representations on behalf of five people or organisations argued that policy S8 is unsound. Four representations on behalf of four people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	The implications of reducing the developable area of the site 17 employment allocation on the funding and delivery strategy of policy S9 and appendix K of the South West Rugby masterplan should be considered.
Who raised the issue	Homes England
No. raising the issue	1
Council response	Appendix K of the South West Rugby Masterplan SPD was not predicated on any development of the safeguarded land as at that point it was not allocated for development. The development principles plan for the new site allocation under Policy S7 remove 90 houses from the areas proposed to be developed for residential in the South West Rugby Masterplan SPD as this area is now proposed to be part of the open space buffer to Cawston Spinney. The delivery of employment floorspace on the safeguarded land should offset this. This will need to be considered as part of the planning applications.
Issue	Proposals are not deliverable in the timescales suggested.

Who raised the issue	Pailton Parish Council
No. raising the issue	1
Council response	The trajectory for South West Rugby is realistic. First completions on the site are expected in 2026-27. This therefore implies a build rate of 219dpa across the site over the plan period. This is relatively high, compared to national averages, but is realistic in a borough with a strong track record of delivering large urban extensions including Houlton as detailed above. As detailed in the Development Needs Topic Paper, the absence of a master-developer at South West Rugby and greater fragmentation of land ownership is likely to give rise to more competition and more sales outlets on site, driving more rapid delivery.

Issue	The original aim was for warehousing in SW Rugby to deliver employment for 2,500 employees but figures don't support this.
Who raised the issue	Coleman, Brian
No. raising the issue	1
Council response	Policy DS8 of the adopted local plan allocated 35ha of employment land at the South West Rugby urban extension. The purpose of this was to meet the needs for employment land in Rugby Borough and the wider functional economic market area. Although estimates may be made regarding the number of employees that allocated developments may have once built out, this is not something that the planning system can regulate.

Issue	Since the build [of warehouses at South West Rugby] the area has suffered light pollution, impact on bird population & flooding in Thurlaston. No further warehousing should come forward in the area.
Who raised the issue	Coleman, Brian
No. raising the issue	1
Council response	The impact of the warehouses that have already been built out at South West Rugby was considered when the adopted plan was examined and the planning applications were decided. Although the development of the existing warehouses cannot be retrospectively amended via the new local plan, their presence has been accounted for when giving due consideration to the potential impacts of allocating site 17, which would effectively act as an extension to the existing employment site. These potential impacts have been assessed with reference to a range of technical evidence, such as an ecological constraints assessment (SS25), and would need to be considered again in greater detail at the application stage against the requirements of local and national policy, including policies that relate to flooding, the natural environment, and the amenity of neighbours.

Issue	Policy is unsound because of criterion E refers to the South West Rugby Design Code which is itself an unsound SPD.
Who raised the issue	Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	1
Council response	The South West Rugby Design Code was adopted by the Council on 9 July 2025. The Council have already addressed the consultee's points of opposition to the SPD, as detailed in the SPD's consultation statement, and do not deem it necessary to reproduce these here.

Issue	The plan states "Physical and visual separation from the Dunchurch settlement boundary shall be maintained by a significant green buffer to prevent coalescence." but it is clear from the "South West Rugby Masterplan Supplementary Planning Document" that there is no significant area of separation. It is also not clear what constitutes a green buffer.
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council response	An explanation of the buffer area between Rugby and Dunchurch is given on pages 22-29 of the South West Rugby Masterplan SPD and its extent is shown in the figures included in that document. The SPD specifies that the buffer will incorporate "a green infrastructure corridor from Cock Robin Wood to Cawston Spinney", and green infrastructure is defined in the glossary of the same document. The Council deems that the extent and characteristics of the buffer are made sufficiently clear by the SPD.

Issue	Requirements of adopted policy DS8 are weakened without justification. The requirements for the green infrastructure corridor to link to adjacent networks, for structural landscaping, and for SWR to develop a separate character and sense of community from both Rugby and Dunchurch should be reinstated.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The extent and characteristics of the green infrastructure corridor needed in South West Rugby, including the need for it to link with adjacent green infrastructure, has been set out in the South West Rugby Masterplan SPD, the requirements of which will continue to apply per S8.C.vii. Therefore, it is not deemed that specifying the need for the development to deliver a green and blue infrastructure corridor in a more concise manner in the new policy (i.e. not explicitly stating that there must be links to adjacent networks) will make a material difference in this regard. The same position is deemed to apply with

	regards to the separation of Rugby and Dunchurch; the policy retains the requirement for physical and visual separation, and a more detailed explanation of the landscaped buffer is provided for by the SPD. That proposed policy S8 refers to “landscaping” while adopted policy DS8 refers to “landscaping measures, including structural landscaping” this wording difference is not deemed to be of significance.
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4.83. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Wording around off-road networks should be clear that equestrians cannot be designed out of off-road routes. Explicit reference to consideration for horse riding in active travel routes around Cock Robin Wood and Cawston Spinney, for example.	British Horse Society
Contributions may be sought towards delivery of highways and active travel mitigation schemes listed in Appendix K of the South West Rugby Masterplan SPD	Homes England; Taylor Wimpey Strategic Land
In para G insert the word “structural” before the word “landscaping”.	Allanach, Richard
Replace para F with “The physical and visual separation of Dunchurch and the town of Rugby shall be maintained by a significant green buffer to prevent coalescence”.	Allanach, Richard
Add the phrase “linking to adjacent networks and” after the word “corridor” in para C (v).	Allanach, Richard
<p>Council response to modification proposals:</p> <p>The comment in relation to equestrians is a detailed design matter that can be picked up at planning application stage.</p> <p>The policy already requires at Cvii the delivery of the strategic infrastructure SPD. Further specific reference to the part of the SPD listing requirements i.e. Appendix K is not needed.</p> <p>The council’s response to the comments of Richard Allanach is set out above.</p> <p>Overall, no modifications are considered necessary.</p>	

POLICY S9 SOUTH WEST RUGBY SPINE ROAD NETWORK

4.84. Two representations on behalf of two people or organisations argued that policy S9 is unsound. Four representations on behalf of four people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	S9 is unsound because the viability of the South West Rugby Spine Road Network is undermined by the reduction of the floorspace allocated at Site 17.
Who raised the issue	Tritax Big Box Developments Ltd (Site 17)

No. raising the issue	1
Council response	<p>This refers to the reduction of floorspace proposed on site 17 between the preferred options and proposed submission versions of the emerging local plan.</p> <p>The delivery of the spine road network was planned to take place without any development of the safeguarded land (site 17), The South West Rugby Masterplan SPD and its strategic infrastructure schedule (Appendix K) make no assumption of contributions from the safeguarded land. Therefore, delivery of the spine road network is not contingent upon achieving a target level of floorspace on site 17.</p>

Issue	The defining description in para 1.40 is unjustified because it does not reflect evidence in the South West Rugby SPD. The requirement for one bus gate is specified in the supporting text for S9, while another is unnecessarily buried in the SPD. This is inconsistent with national policy which requires plans to be clearly expressed so as to give certainty.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	Paragraph 1.40 is supporting text/reasoned justification. It is not intended to be a comprehensive statement of the design detail, which is provided in the Masterplan SPD and Design Code SPD

4.85. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Development requirements set out in the Site Allocations annex should be updated for sites 62, 332, 353, 283, 350, 351, 354, 355, 279, 153, 294, 356, 357, 352, and 349 to include "Contributions may be sought towards delivery of highways and active travel mitigation schemes listed in Appendix K of the South West Rugby Masterplan SPD"	Taylor Wimpey Strategic Land
Insert "(with a bus gate)" after "Cawston Lane" in the third bullet point of para 1.40.	Allanach, Richard
<p>Council response to modification proposals: A clear evidential justification does not exist for the site reference numbers listed by Taylor Wimpey which comprise all allocations in Rugby, many small and distant from the site, to contribute towards the South West Rugby mitigation package.</p> <p>The council's response to Mr Allanach is set out above.</p>	

POLICY CL1 NET ZERO BUILDINGS

- 4.86. 101 representations on behalf of 110 people or organisations argued that policy CL1 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound. The following issues were raised in respect of policy CL1.
- 4.87. A significant proportion of the responses arguing the policy is unsound on the basis that it should address the locations of development and development should not occur in locations not deemed sustainable. This is not listed as a main issue below, because it is outside of the scope and purpose of the policy. The location of development in relation to transport is addressed in Policy I1 (transport).

Issue	Proposed net-zero buildings policy addresses only new buildings in operation but not the carbon cost of development or embodied carbon.
Who raised the issue	Yates, Alan; Frasers Group
No. raising the issue	2
Council response	The above statement is true. 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.

Issue	Development should not be required to deliver above national standards/government targets and should align with future building standard.
Who raised the issue	Inside Land Group; Barberry Ansty Limited; Tritax Park Rugby West Limited; Churchill Living & McCarthy Stone; Places for People; Catesby Estates (Site 136); Rosconn Group; Midlands Land Portfolio; Mackenzie Miller Homes; Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	10
Council response	The Net Zero Evidence report (CL1) sets out the case for a policy which would exceed current national standards and also the Future Homes Standard. These standards would not deliver net zero in operation.

Issue	Policy could raise viability issues/deter investment in borough/reduce affordable housing delivery.
Who raised the issue	Barberry Ansty Limited; Vistry Group; West Midlands Housing Association Planning Consortium; Catesby Estates (Site 136); Mackenzie Miller Homes; Tritax Park Rugby West Limited
No. raising the issue	6
Council	Amendments were made to policy CL1 following the Regulation 18 (Preferred Option)

response	consultation to minimise cost uplifts associated with achieving the policy objectives. This was based on the evidence set out in the Net Zero Evidence Base report (document reference CL1). The amended cost assumptions were subsequently included in the Viability Report (document reference I1) for the Submission Plan. We think this strikes the right balance between achieving net zero in operation and maintaining development viability.
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Issue	Policy requirements for on-site electricity generation equal to demand and definitions of reasonably practicable maximums for on-site generation are overly onerous and unreasonable.
Who raised the issue	Frasers Group; Vistry Group
No. raising the issue	2
Council response	On-site renewable energy generation is a key component of achieving net zero operational carbon and is widely considered feasible in new developments, as set out in the evidence base report (CL1). Paragraph A.iv provides flexibility where on-site generation is not technically feasible, ensuring the policy remains practical and deliverable.

Issue	Policy should be consistent with revised climate policies in the draft NPPF (Dec 2025).
Who raised the issue	Richborough (Long Lawford)
No. raising the issue	1
Council response	The draft NPPF (December 2025) holds no weight at the time of writing. The national consultation on the proposed changes has closed and the outcome is awaited. We will monitor this matter when the new NPPF is published.

Issue	Fossil fuel free requirement in ii prevents new developments from being connected to mains electricity given it uses fossil fuels.
Who raised the issue	Frasers Group; Vistry Group
No. raising the issue	2
Council response	Fossil fuel free means no fossil fuels are used in normal building operation, with energy demands met through electricity and/or renewables. These definitions are consistent with national best practice and standards, including the UK Net Zero Carbon Buildings Standard and precedent local plans. The objective of the policy and the policy requirement is to match energy demand with renewable energy generation. In such circumstances it would be fossil fuel free.

Issue	Net zero in operation not achievable for speculative logistics buildings as occupier not
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	known.
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising the issue	4
Council response	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. 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.

Issue	For employment buildings with automated systems and vehicle charging + there are also significant constraints to grid capacity which severely limits the size of PV array. This means requirement for renewables is not achievable for logistics buildings
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising the issue	4
Council response	<p>Part A(iv) of the policy sets out a flexible approach where it can be demonstrated that renewable energy generation cannot technically match demand (e.g. server farms or refrigerated requirements). Part A(iv) was amended in line with consultation feedback at Regulation 18 (Preferred Option) stage and subsequent specialist advice. It now states that in such circumstances renewable energy generation should instead be maximised as far as possible. As set out in the Net Zero Carbon evidence base report (document CL1), this is similar to the approach taken in adopted local plan policies within England.</p> <p>Vehicle charging does not fall within the definition of unregulated energy in policy CL1. The definition of unregulated energy within Policy CL1 relates to energy consumed by the building itself (e.g. lighting, plug loads, appliances). This ensures the target reflects the true operational performance of the building without penalising developments for providing EV charging.</p>

Issue	There are a number of statements which are ambiguous and may allow loopholes to be exploited. An example being "if iii is not technically achievable for a particular building typology in its context, on-site renewable energy generation shall be fully maximized as practicable". Who will define what is practicable?
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council	Part A(iv) of the policy (quoted above) was amended to be more flexible following the

response	Regulation 18 (Preferred Option) consultation on the basis of feedback received and the subsequent advice of the appointed specialist consultant. It is considered that this flexibility is necessary, as some development typologies may not be capable of achieving the requirements. Where this is the case, the applicant would be required to provide evidence and maximise energy generation as set out in the policy. This would be assessed on a case-by-case basis at planning application stage.
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Issue	Query evidence in the Local Plan Viability Study for assumptions made on the cost uplift of achieving net-zero carbon or Future Homes Standard.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	Emerging Policy CL1 requires that developments should be net zero carbon in operation. The Council has sought specialist advice on the specific policy requirements from Bioregional, as set out in the Net Zero Evidence Report (document CL1) , who have advised that the extraover cost for two scenarios equate to 3.2% and 4% of construction costs, both of which are tested in the Local Plan Viability Study (I1). Policy CL1 is more stringent than the Future Homes Standard so no additional allowances are required for FHS.

4.88. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Detailed revised policy wording proposed (see rep)	Inside Land Group; Frasers Group; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
Amendments to on-site renewables requirements and energy efficiency should be loosened to be more reasonable and practicable (see rep for proposed wording)	Frasers Group
Amend to reflect revised national standards in building regs	Places for People
Passivhaus standards should be mandatory for all new builds.	O'Connell, Mark
Open and unmeasurable statements which can be exploited must be reworded and clarified to remove all aspects of ambiguity	O'Connell, Mark
Council response to modification proposals: Proposed modifications for policy CL1 either seek to strengthen the requirements or conversely loosen the requirements and increase flexibility. The council believes the current approach, which has been informed by specialist consultants Bioregional and the Net Zero Evidence Report (document CL1), strikes the balance of ensuring the desired outcomes are realised without impacting the ability of development to come forward.	

POLICY CL2 RENEWABLE ENERGY AND LOW CARBON TECHNOLOGY

4.89. 93 representations on behalf of 453 people or organisations argued that policy CL2 is unsound. The main issues for this policy are listed below.

Issue	Land between Clifton and Houlton identified as suitable for wind turbine development would have significant impacts on residents and landscape on the northwestern edge of Houlton and in Clifton.
Who raised the issue	Fung, Tsz Hong; Hardy, Rebecca; Hardy, Joshua; Dance, Stephanie; Wong, Fennie; Polamarasetty, Ananth; Residents of the Redrow estate, Houlton; Kirkton, Daniel; Kuncova, Miroslava; Ashwood, Sally; Sahul Hameed, Jasima Farveen; Tse, Chi Ho; Wong, Sau Yee; Barber, Paul
No. raising the issue	73
Council response	Policy CL2.C specifies that wind turbine development will, <i>subject to compliance with other policies of this plan</i> [emphasis added], be permitted within the areas shown as suitable on the policies map. The explanatory text goes on to flag up EN2 (Landscape protection) and EN8 (Environmental protection and amenity) as policies of relevance. Therefore, the Council deem that the impacts of any renewable energy developments on residents and landscape would be duly considered at the planning application stage.

Issue	Potential wind turbines between Clifton and Houlton poses significant threat to local wildlife, in particular bird and bat populations. Proximity to Oxford Canal requires ecological assessment. Policy is in conflict with NPPF section 15 focusing on conserving and enhancing the natural environment.
Who raised the issue	Nicholson, Carmen; Mistry, Ketan; Residents of the Redrow estate, Houlton; Abdul Kapoor, Sahul Hameed; Ashwood, Sally; Sahul Hameed, Jasima Farveen; Barber, Paul
No. raising the issue	66
Council response	As per the response to the previous issue, policy CL2.C specifies that wind turbine development will, <i>subject to compliance with other policies of this plan</i> [emphasis added], be permitted within the areas shown as suitable on the policies map. Policy EN1 provides protection to biodiversity and geodiversity, and this policy would have to be complied with if a wind turbine development proposal is to be permitted in the areas identified as suitable under CL2. Therefore, the policy is not deemed to present a significant threat to wildlife in the manner posed, and for the same reason is not deemed to be inconsistent with NPPF chapter 15. It is not deemed appropriate to subject policy CL2 to an ecological assessment. Such an assessment may instead be appropriate at the planning application stage should it be necessary to demonstrate that a wind turbine proposal is compliant with national and local planning policy.

Issue	Plan does not specify numbers of turbines, separation distances from homes or siting criteria.
Who raised the issue	Hardy, Rebecca; Hardy, Joshua; Dance, Stephanie; Yip, Alice; Polamarasetty, Ananth; Vaghela, Hemma; O'Neill, Hannah
No. raising the issue	7
Council response	Policy CL2 identifies areas that are suitable for wind turbine development, it does not allocate land in the manner that policies S6 and S7 do for residential and employment land. As such, it would not be appropriate for the policy to specify the number of turbines that each area could have capacity for. As is explained in the Renewable Energy Potential Mapping Methodology (CL3), distance buffers have been applied in arriving at the areas of suitability, including a 400m noise buffer for buildings. Although the policy does not provide detailed siting criteria for wind turbines, any proposals would need to comply with other policies of the plan that provide various protections. The renewable and low carbon energy PPG provides further explanation of the planning considerations for wind turbines and it is not deemed necessary to duplicate these in Policy CL2.

Issue	Policy has not been sufficiently evidenced that the proposals will not harm the residential amenity of nearby properties, health of residents or the landscape and character of the area.
Who raised the issue	Hardy, Rebecca; Hardy, Joshua; Dance, Stephanie; Yip, Alice; Polamarasetty, Ananth; Residents of the Redrow estate, Houlton; Vaghela, Hemma; O'Neill, Hannah; Ashwood, Sally; Sahul Hameed, Jasima Farveen; Tse, Chi Ho; Wong, Sau Yee; Longworth, Tom
No. raising the issue	72
Council response	In determining the areas suitable for wind energy development, document CL3 explains that a distance buffer from residential properties was applied. Policy CL2.C specifies that wind turbine development will, <i>subject to compliance with other policies of this plan</i> [emphasis added], be permitted within the areas shown as suitable on the policies map. This means that should wind turbine proposals come forward, they will only be permitted if they comply with policies that specifically relate to the matters raised above, including EN8 (Environmental protection and amenity) and EN2 (Landscape protection). It is deemed that these other policies provide sufficient protection against harms when read in combination with policy CL2.

Issue	Renewable energy and low carbon energy development are inappropriate in the Green Belt - policy should specify that non-Green Belt proposals are preferred.
Who raised the issue	James , Charles; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Court, Gerry & Carol; Spencer, June; Griffin, Colin; Jones, David; Ling, Philip; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Penman, Judith; Higginson, Helen; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes,

	Michael; Wykes, Janet; Fitzgerald, Elizabeth; Pitt, Michelle; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; Russell, Pauline; Bassett, Graham; White, Claire; White, Garrie; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Coope, Joanne; Lumsden, Jennifer; Dale, Diane; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Kelly, Patrick and Linda; Sheffield, Kim; Sheffield, Andy; Downes, Steve and Allyson
No. raising the issue	69
Council response	National policy already defines what constitutes inappropriate development in the Green Belt, and paragraph 160 of the NPPF (2024) specifically addresses renewable energy projects stating “When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.” It is not deemed necessary to duplicate this in the local plan.

Issue	Potential wind turbine development between Clifton and Houlton fails to consider the significant substantial harm to the setting of heritage assets such as St Mary's Church (Grade II listed).
Who raised the issue	Polamarasetty, Ananth
No. raising the issue	1
Council response	<p>St Mary’s Church is within the centre of Clifton upon Dunsmore and approximately 1.1km at its closest point to the area identified as suitable for wind development. There is considerable intervening development of housing between the church and the area identified as suitable for wind energy development. This means it is highly unlikely that the area identified as suitable makes any contribution to the setting of the listed church.</p> <p>As a general point, Policy CL2.C specifies that wind turbine development will, <i>subject to compliance with other policies of this plan</i> [emphasis added], be permitted within the areas shown as suitable on the policies map. This includes policy D4 which affords protection to the historic environment, including heritage assets such as St Mary’s Church, and gives effect to national policy and legislation. If proposals for wind turbine development were to come forward in the areas identified as suitable by policy CL2, then their potential impact on heritage assets would be duly considered at the application stage.</p>

Issue	Loss of landscape character and agricultural land for little benefit. Grade 3b agricultural land should be protected equally.
Who raised	CPRE

the issue	
No. raising the issue	1
Council response	<p>The Council does not agree that planning for renewable and low carbon energy production is of little benefit. Increasing the amount of energy from such sources is of vital importance to secure the country's future energy supply and reduce greenhouse gas emissions in an effort to mitigate climate change.</p> <p>The potential impact of any future wind turbine proposals on landscape character would be addressed by policy EN2 (Landscape protection), and part D of policy CL2 provides a protection against the loss of large areas (20ha or more) of best and most versatile agricultural land.</p>

Issue	Very special circumstances requirement for green belt development should be expanded to cover the area within policy EN3
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	This is not a comment on Policy CL2 but is addressed here because that is the policy it was raised in respect of. The need for Green Belt proposals to demonstrate 'very special circumstances' is a requirement of national policy. It is not deemed necessary or appropriate to extend this to non-Green Belt areas, such as that covered by policy EN3.

Issue	Lack of safeguards - the policy does not provide sufficient protection to ensure that the 'very special circumstances' required for Green Belt development are strictly upheld, potentially leading to the degradation of protected open spaces.
Who raised the issue	Coope, Joanne
No. raising the issue	1
Council response	This is a national policy test, but its application will be a matter for future decision makers.

Issue	Policy should be consistent with revised climate policies in the draft NPPF (Dec 2025)
Who raised the issue	Richborough (Long Lawford)
No. raising the issue	1
Council response	The plan has been produced under the legacy planning system and therefore it is not reasonable to expect its policies to fully align with emerging national policies that are yet

	to be implemented.
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4.90. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend policy to limit development on grade 3B agricultural land, and landscape sensitive areas. Remove from policies map suitability for wind turbines at Churchover, Willey, Newnham and High Cross area north of Rugby.	CPRE
Add requirement for developers to demonstrate there will be no adverse impact on residential health, noise or visual amenity	Longworth, Tom
Add requirement for assessment of 'cumulative impact' where turbines are viewed alongside large-scale warehousing and housing	Longworth, Tom
<p>Council response to modification proposals: As explained in response to the main issues, this policy specifies that wind turbine development will, <i>subject to compliance with other policies of this plan</i> [emphasis added], be permitted within the areas shown as suitable on the policies map. It is deemed that other policies provide adequate protections, and these provisions need not be repeated within CL2 itself.</p> <p>The council’s response to CPRE’s comment is set out above.</p>	

POLICY CL3 WATER SUPPLY, QUALITY AND EFFICIENCY

4.91. 13 representations on behalf of 16 people or organisations argued that policy CL3 is unsound. One representation on behalf of one person or organisation argued that the policy is sound. The main issues for this policy are listed below.

Issue	Concerns about the implementation of Part D of the policy. It would require the instruction of a BREEAM Assessor to assess only one element of the development to demonstrate compliance with the policy.
Who raised the issue	Barberry Ansty Limited
No. raising the issue	1
Council response	The large scale of additional employment floorspace that will be delivered in the borough means that an effective policy should also cover this type of development. In the absence of an optional Building Regulation for employment development it is necessary to refer to a different identifiable yardstick. The use of this measure is recommended in the Stage 2 Water Cycle Study (document I10).

Issue	The issue of water efficiency would be better dealt with through the application of building regulations, rather than by requiring adherence to a non-statutory standard as set out in Part D of the policy.
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Who raised the issue	Barberry Ansty Limited
No. raising the issue	1
Council response	We disagree and the stage 2 Water Cycle Study (I10) makes the case that there is a need to reduce the use of water resources.

Issue	Part C duplicates Building Regulations and is unnecessary.
Who raised the issue	Places for People; William Davis Homes (site 315); West Midlands Housing Association Planning Consortium
No. raising the issue	3
Council response	Part C refers to Building Regulation 36(2)(b), which is an optional requirement of 110 litres per person per day. This policy seeks to apply this optional requirement to the development of dwellings in the borough, as the evidence base highlights Rugby is in an area of water stress (see I7). A similar policy is included in the adopted local plan.

Issue	Inconsistent with emerging national policy (PM13).
Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	The plan has been produced under the legacy planning system and therefore it is not reasonable to expect its policies to fully align with emerging national policies that are yet to be implemented.

Issue	Policy is ambiguous and cannot be applied. Part A specifies that new development shall “minimise” the need for new infrastructure by being located where there is adequate water supply, but the term “minimise” is not defined. In any case, this is a matter to be addressed during the allocation of sites, not the determination of planning applications.
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	The local plan is a policy document which contains language which is to be interpreted straightforwardly. It is considered that applicants, decision takers and other stakeholders will be able to interpret what “minimise” means and is not deemed necessary to assign it a definition in the plan’s glossary. The council does not agree that water supply should only be considered when allocating sites for the plan – the matter will be just as relevant for any applications that may come forward for development at unallocated sites.

Issue	Policy requirement likely to be difficult to achieve for logistics development.
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising the issue	4
Council response	It would not be appropriate to have a blanket exemption for logistics developments from this policy. Part D of the policy already specifies that where it is demonstrated to be impracticable major new non-residential developments will not have to achieve full credits for category Wat 01 of BREEAM.

Issue	There is no guarantee that water can be supplied for a further 150 houses in Wolvey (site 309).
Who raised the issue	Reeve, Kathleen
No. raising the issue	1
Council response	Severn Trent Water have a legal duty to supply water for domestic purposes to households in the Borough, including any houses that come forward via planned growth. A Water Cycle Study (I10) has been produced in consultation with Severn Trent Water which, amongst other things, assesses the Borough's current water supply infrastructure and identifies upgrades that may be necessary to accommodate planned growth. It finds that an upgrade to the Bramcote Wolvey Booster Station will be required, and this has been captured in the Infrastructure Delivery Schedule (I2). Therefore, the council deems that it has taken the necessary steps to enable water to be supplied to sites allocated by the local plan.

Issue	Evidence (WCS) points to the need for a water efficiency standard of 100 l/p/d not 110 l/p/d.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The Water Cycle Study (stages 1 and 2) (I7 & I10) does recommend consideration of a water efficiency standard of 100l/p/d. However, the Council considers that a policy requirement of 110l/p/d, in line with the optional Building Regulation 36(2)(b) is aligned with the current national regulatory regime. The standard proposed in the policy also fulfils what was recommended by Severn Trent Water in their response to the Preferred Option consultation.

4.92. Below is a summary of some of the modifications to the policy proposed in representations,

together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Remove part C to avoid duplication with Building Regulations	Places for People
Update wording to says that non-residential developments should achieve at least 3 credits in the Wat01 measure	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
Amend part C of CL3 to specify 100 litres per person per day instead of 110 (as recommended by WCS) and delete the reference to building regulations.	Allanach, Richard
<p>Council response to modification proposals: For the reasons explained above the council does not support the modifications proposed by Places for People or Richard Allanach.</p> <p>The proposal by GLP Europe and others is effectively a reduction in the stringency of the standard for non-residential development. The council does not support this modification as it considers the proposed policy approach is justified.</p>	

POLICY CL4 CLIMATE ADAPTATION

4.93. Eight representations on behalf of eight people or organisations argued that policy CL4 is unsound. Three representations on behalf of three people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Policy should be consistent with revised climate policies in the draft NPPF (Dec 2025).
Who raised the issue	Richborough (Long Lawford)
No. raising the issue	1
Council response	The plan has been produced under the legacy planning system and therefore it is not reasonable to expect its policies to fully align with emerging national policies that are yet to be implemented.

Issue	Green space provision is often achieved through Biodiversity Net Gain which may not be compatible with this policy.
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	We disagree that these are incompatible. Part ii of the policy and BNG have a role in adapting to climate change. Not all green spaces are exclusively for the purpose of BNG

	and a holistic design approach to any scheme should be taken.
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4.94. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend to reflect revised climate policies on carbon reduction, resilience and climate obligations in the draft NPPF (Dec 2025)	Richborough (Long Lawford)
Delete policy or revise to recognise the role of BNG in the provision of green space	Vistry Group
Council response to modification proposals: The Council do not deem it necessary to adopt these modifications for the reasons given in response to the main issues above. Not all green spaces are exclusively for the purpose of BNG, and it is not deemed reasonable to expect the local plan to fully align with draft national policies that are yet to be adopted.	

POLICY E1 EMPLOYMENT LAND PROTECTION

4.95. Four representations on behalf of four people or organisations argued that policy E1 is unsound. The main issues for this policy are listed below.

Issue	Part B is unreasonably onerous with 24-month marketing requirement unsound
Who raised the issue	Panattoni and AC Lloyd
No. raising the issue	2
Council response	This part of the policy is consistent with current adopted Local Plan 2011-2031 policy ED1 which requires 24 months’ marketing. This remains appropriate to ensure the policy has teeth.

Issue	Blanket prevention of alternative uses on site such as small-scale retail, food and beverage or childcare will harm marketability of employment sites
Who raised the issue	Panattoni and AC Lloyd
No. raising the issue	2
Council response	Retail and food and beverage uses are main town centre uses. These would not ordinarily be supported in employment site locations. We are not convinced that industrial locations are appropriate for childcare.

Issue	The policy would allow losses of employment land, and this would compound failure to plan for enough employment land
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Who raised the issue	Richborough Commercial (M45 J1)
No. raising the issue	1
Council response	A policy which sought to prohibit losses of employment land would be inconsistent with national policy. The comment about the quantum of employment land planned for is addressed under Policy S3 above.

4.96. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend part B (i) to reduce marketing period from 24 to 12 months and change "and" to "or"	Panattoni and AC Lloyd
Expand policy to allow supporting non-employment uses where ancillary to employment use and supporting the needs of businesses and employees	Panattoni and AC Lloyd
Amend supporting text to include employment allocations	SEGRO
Council response to modification proposals: The Council considers the content of this policy to be justified as set out in response to the main issues above. Employment allocations are already referenced in the supporting text and the policy wording – it is not considered required to specify the strategic employment allocations within this policy.	

POLICY E2 EMPLOYMENT DEVELOPMENT

4.97. 31 representations on behalf of 35 people or organisations argued that policy E2 is unsound. The main issues for this policy are listed below.

Issue	Lack of support for rural employment sites outside settlement boundaries. Contrary to Economic Strategy and NPPF (paras 88 and 89) and to draft NPPF
Who raised the issue	S&D Postlethwaite; Everwell Development and Mactaggart Family & Partners; Stoford Properties Ltd; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes; Richborough Commercial (M45 J1)
No. raising the issue	9
Council response	Paragraph 88 NPPF a) states that planning policies should enable “the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings” while paragraph 89 states “Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.”.

	<p>Policy E2 accords with the wording of paragraph 88a) by allowing the expansion/growth of rural businesses outside of settlement boundaries through conversion, expansion and infilling of vacant areas within sites (i.e. new build).</p> <p>The local plan will be examined under the legacy (2024) NPPF. It was prepared prior to publication of the consultation version NPPF, which remains a consultation version only.</p> <p>The NPPF paragraphs cited are about supporting local business needs in rural areas. These policies are not targeted at big and mid box logistics warehouses housing national distribution centres of the type being promoted by many omission site promoters in Rugby Borough.</p>
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Issue	Para C is too restrictive for office uses
Who raised the issue	S&D Postlethwaite
No. raising the issue	1
Council response	Paragraph C merely gives effect to national policy which identifies offices as a main town centre use to which the sequential test in Section 7 NPPF applies.

Issue	Policy not flexible enough to respond to market demands or unexpected changes
Who raised the issue	Richborough Commercial (M45 J1)
No. raising the issue	1
Council response	This is a similar argument to the first issue raised above. The plan has identified employment land needs and allocates sites to meet them. There are two mechanisms that allow, within a plan-led system, further land release if this is justified. The first is the requirement for 5 year plan reviews. The second is the operation of the discretionary planning system itself, this means that planning permission can be granted if material considerations indicate against determination in accordance with the development plan.

4.98. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
The policy should be modified to include a new clause enabling essential digital and data-processing infrastructure in rural or edge-of-settlement locations where operational requirements necessitate such siting	Everwell Development and Mactaggart Family & Partners
A new employment policy, E4, should be introduced which would be a	Everwell Development and

dedicated enabling policy for data centres and digital infrastructure, providing a pathway for their development.	Mactaggart Family & Partners
Amend part E to add a further criteria point "where there is evidence that during the plan period the employment allocations given in policy s7 are unable to deliver the plans identified employment needs"	Windsor Developments Limited; Windsor Developments (Site 145)
Introduce a limit on the volume of low skilled/low-income employment development	O'Connell, Mark
Give priority to lower/smaller employment developments in rural and residential areas. Where this is not possible, significant natural buffers should be created to protect the visual aspects of these areas.	O'Connell, Mark
Amend paragraph (E)(iii) to instead say: "It would address an unmet need where the site is readily and regularly accessible by means of transport other than the private car; or"	Richborough Commercial (M45 J1)
Suggested new wording (see rep) supporting development where there is evidence of need that can't be met through allocated sites in the plan	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
Delete para E	Stoford Properties Ltd
<p>Council response to modification proposals: Many of the proposed modifications seek to enable larger development to come forward on unallocated rural sites. The council has responded to that proposal above. The Council believes the policy supports the plan-led system, with unallocated development being approved only where in categories supported by the plan or where material planning considerations and national policy permit.</p> <p>The council does not consider that there is evidence to support the need for a more permissive approach to data centres as distinct from other types of employment development.</p>	

POLICY E3 RURAL ECONOMY

4.99. Three representations on behalf of four people or organisations argued that policy E3 is unsound. The main issues for this policy are listed below.

Issue	Inconsistent with national policy. Doesn't support all types of business in the rural areas and is too restrictive.
Who raised the issue	S&D Postlethwaite; Everwell Development and Mactaggart Family & Partners; J Marine Limited
No. raising the issue	4
Council response	This policy needs to be read in conjunction with Policy E2 which covers other types of employment uses in rural areas. Comments about Policy E2 are addressed above.

4.100. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications

proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
The policy should be modified to make it clear that the policy only relates to the small scale, traditional rural economy in line with paragraph 88 of the NPPF.	Everwell Development and Mactaggart Family & Partners
E3.A.vi should be deleted and replaced with "Proposals for new canal-based facilities should be directed to locations within or adjacent to defined settlements to ensure that these are sustainably located."	J Marine Limited
At the start of E3.A.i "small-scale" should be deleted to make the policy consistent with national policy.	J Marine Limited
Council response to modification proposals: The policy is compliant with NPPF para 88. Restrictions such as the reference to 'small-scale tourism' seek to ensure proposals respect the character of the countryside, in line with national policy. The proposal by J Marine Limited that all canal based facilities should only be within or adjacent to defined settlements is not supported and would be more restrictive than national policy.	

POLICY C1 RUGBY TOWN CENTRE

4.101. No main issues have been identified with Policy C1, beyond the modifications set out below.

4.102. Four representations on behalf of four people or organisations argued that the policy is sound.

4.103. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Clause B vii. could be worded to better reflect the guidance of the NPPF by stating "support the conservation and enhancement of heritage buildings and their setting".	Historic England
Add the word "retail" to para B.i.	Warwickshire County Council
Council response to modification proposals: The council agrees with both modifications proposed and these have been put forward in the schedule of proposed additional modifications in core document CD20.	

POLICY C2 MAIN TOWN CENTRE USES

4.104. Two representations on behalf of four people or organisations argued that policy C2 is unsound. One representation on behalf of one person or organisation argued that the policy is sound. The following main issues were raised with Policy C2:

Issue	Definition of employment use inconsistent with national policy (see also in the glossary)
Who	S&D Postlethwaite

raised the issue	
No. raising the issue	1
Council response	<p>Policy C2 references ‘main town centre uses’. The definition of a main town centre use is defined in the glossary and matches exactly with the definition in the glossary of the NPPF.</p> <p>The definition of ‘employment use’ within the glossary of the Submission Local Plan notes that “subject to compliance with policy C2 (main town centre uses) use class E(g)(i) will also be an employment use.” There is no definition of ‘employment use’ within the glossary of the NPPF.</p>

Issue	Policy is unenforceable - permitted development rights can be used to repurpose class E buildings for other uses
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	The existence of permitted development rights does not render the policy unenforceable, not least because main town centre uses (per the definition provided in the local plan and the NPPF) are not exclusively use class E.

POLICY C3 LOCAL AND DISTRICT CENTRES

4.105. One representation on behalf of one person or organisation argued that policy C3 is unsound. One representation on behalf of one person or organisation argued that the policy is sound. The following main issue was raised with Policy C3:

Issue	Policy is unenforceable and should be deleted - permitted development rights can be used to repurpose class E buildings for other uses
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	The existence of permitted development rights does not render the policy unenforceable, not least because main town centre uses (per the definition provided in the local plan and the NPPF) are not exclusively use class E.

POLICY C4 NEIGHBOURHOOD HUBS

4.106. No main issues were raised with Policy C4. Two representation on behalf of two persons or

organisations argued that the policy is sound.

POLICY EN1 BIODIVERSITY AND GEODIVERSITY PROTECTION

4.107. 72 representations on behalf of 74 people or organisations argued that policy EN1 is unsound. Three representations on behalf of three people or organisations argued that the policy is sound.

4.108. A significant proportion of those making representations that the policy was unsound argued that it was unsound because proposed residential site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy EN1 itself and so this hasn't been identified as a main issue.

4.109. The following main issues were raised with policy EN1:

Issue	No explicit reference to NPPF 193(c) "wholly exceptional reasons" test for development affecting irreplaceable habitats.
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	There is no need to reproduce decision-making policies from the NPPF in the local plan. EN1.A makes clear that national policy will be applied in determining planning applications.

Issue	No requirement for Root Protection Areas for ancient and veteran trees with presumption against development in these areas.
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	National policy (NPPF 193(c)) provides protection for ancient and veteran trees, and national guidance specifies that root protection areas should be established when proposed developments are near to ancient or veteran trees. We do not believe there is a need to reproduce national policy and guidance in the local plan.

Issue	Management plans should be secured by condition or legal agreement, monitoring responsibilities should be clearly defined, and enforcement triggers should be explicit where outcomes fall short.
Who raised the issue	Woodland Trust
No. raising	1

the issue	
Council response	We deem these to be matters that are to be decided and defined at the planning application stage rather than within the policy itself.

Issue	Policies map shows Local Wildlife Site (LWS) boundaries which do not reflect actual features or the areas of development or proposed development approved in the OPP. Strict restrictions on development on a LWS through this policy poses risk to build out of Houlton.
Who raised the issue	Urban & Civic
No. raising the issue	1
Council response	<p>Local Wildlife Sites are designated by the Warwickshire Local Wildlife Sites Panel. The boundaries that we have shown for LWSs on our policies map reflect the data that has been provided to us by the Natural Capital Assessment Partnership (NCAP) on the panel's behalf – they have not been determined as part of our local plan-making process.</p> <p>The council raised the matter of LWS boundaries at Houlton with NCAP following the Reg 18 Preferred Option consultation. In response, they organised a walkover survey of the area in August 2025, however, currently the boundaries are yet to have been amended as a result.</p> <p>If LWS boundaries are subsequently amended, then the new boundary is what will be used for the purposes of decision-making. This is recognised in paragraph 5.4 of our emerging local plan which states “SSSIs, LNRs, LWSs and LGSs as at plan submission are shown on the policies map. These designations are subject to change.”</p>

Issue	Cii is ambiguous - not clear who the decision maker is or at what stage it needs to be demonstrated.
Who raised the issue	William Davis Homes
No. raising the issue	1
Council response	We disagree. Cii is considered to align with national policy (NPPF para 193(a)).

Issue	Duplication of national policy in parts A and B
Who raised the issue	Vistry Group
No. raising the issue	1

Council response	Parts A and B only briefly refer to national policy; they do not duplicate it in any substantial manner.
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Issue	Doesn't go far enough in terms of climate change, especially with the Council's declared 'Climate emergency'.
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	One of the plan's objectives is to reduce carbon emissions and adapt to climate change and several policies are directed towards meeting this objective including an ambitious net zero buildings policy. Furthermore, the plan has been subject to a Sustainability Appraisal, the framework for which includes climate change mitigation and adaptation as topics. The council considers that the plan suitably addresses climate change in line with council objectives and national planning policy.

Issue	The provisions of adopted NE2 relating to blue and green infrastructure corridors have been lost without justification and contrary to national policy. It is not sufficient to simply rely on the LNRS without clear land designations for green infrastructure.
Who raised the issue	Allanach, Richard, Warwickshire Wildlife Trust
No. raising the issue	2
Council response	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.

4.110. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Policy should specify it only applies to development which is not already permitted through an extant outline planning permission	Urban & Civic
Delete parts A and B to avoid duplication of national policy	Vistry Group
Para D needs stronger reference to the Local Nature Recovery Strategy - the word 'contribute' isn't strong enough to deliver step change.	Warwickshire Wildlife Trust
Para C needs to refer to 'Potential Local Wildlife Sites' too and shouldn't allow caveats that allow for loss important designated wildlife sites	Warwickshire Wildlife Trust
Para A should be more ambitious with regards to BNG and not just ask for the basic national requirements. Council needs to encourage over 10% as proven viable locally and is in 20% of other adopted Local Plans	Warwickshire Wildlife Trust

Plan should include grey water policies and street trees as well as green roofs and sustainable technologies on bus stops and large employment sites	Warwickshire Wildlife Trust
Buffers set out in 'Warwickshire Wildlife Trusts Buffer Paper' (included in Nuneaton's plan) should be added to Rugby plan	Warwickshire Wildlife Trust
In para C add “blue and green infrastructure corridor” to the list of sites which are not to be harmed	Allanach, Richard
Add a new paragraph E which states: “Proposals for developments in the continuous green and blue infrastructure corridor which is to be established in SW Rugby in accordance with policy S8 shall provide a framework plan demonstrating the contribution of the development to the corridor”.	Allanach, Richard
Add a new supporting paragraph: “The borough’s blue and green infrastructure corridors are those shown in the GI Green and Blue Infrastructure Policies Map and the Green Infrastructure Map in the SW Rugby Masterplan SPD”.	Allanach, Richard
<p>Council response to modification proposals:</p> <p>It is not necessary to state that this (or other policies) do not apply to development with outline planning permission. Such sites can be developed in accordance with their permissions.</p> <p>The council does not agree with the deletion of policy requirements, for the reasons explained above.</p> <p>In relation to the Wildlife Trust comments, the council considers current reference to the LNRS is adequate. The council does not consider there is a clear justification for seeking to protect potential local wildlife sites given these sites haven’t been surveyed to assess whether they are worthy of designation.</p> <p>As explained elsewhere, the council has elected not to pursue 20% BNG.</p> <p>For the reason also explained above the council does not agree with Richard Allanach’s proposals to incorporate text about green infrastructure corridors.</p>	

POLICY EN2 LANDSCAPE PROTECTION

4.111. 95 representations on behalf of 396 people or organisations argued that policy EN2 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound.

4.112. A significant proportion of those making representations argued that the policy was unsound because proposed site allocations would not accord with it. These representations do not raise soundness issues with Policy EN2 itself and so this hasn’t been identified as a main issue.

4.113. The main issues for this policy are listed below.

Issue	Greater clarity needed on para 5.8's links to policies D3 and D1
Who raised the issue	Hillmorton Voice Residents Association
No. raising	1

the issue	
Council response	It is assumed that the consultee has mistakenly referred to paragraph 5.8 instead of paragraph 5.6. The Council does not believe that further explanation of the links between EN2 and D3 and D1 needs to be given for the policy to be sound.

Issue	Cross-boundary impacts of landscape not considered - policy should address receptors beyond Rugby e.g. West Northamptonshire.
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	1
Council response	Policy EN2 is already formulated in a way that would allow decision-takers to account for adverse impacts on landscapes or receptors in neighbouring authority areas. For example, EN2.A states that “development shall avoid significant adverse impacts on landscape character and significant adverse visual impacts”. It does not state that only impacts within Rugby Borough should be considered.

Issue	EN2 fails to acknowledge that unavoidable landscape impacts of some developments may be acceptable if they are balanced against national or regional needs for digital infrastructure, such as data centres.
Who raised the issue	Everwell Development and Mactaggart Family & Partners
No. raising the issue	1
Council response	For all development types, judgements on planning balance are made in the determination of planning applications.

Issue	Wording is generic and overly restrictive - unclear whether aim is to protect all landscapes or those most valued
Who raised the issue	Miller Homes (Brownsover Road); SEGRO
No. raising the issue	2
Council response	The policy would apply to all landscapes. This is similar to many policies found in local plans including, for example the Uttlesford Local Plan (Core Policy 41 adopted March 2026). The policy strives for conciseness and clarity as to the test it applies and needs to be couched in general terms because of the varying types of development to which it will apply.

Issue	Part C conflates matters of landscape with heritage which should be addressed under Policy D4 for clarity and to avoid unnecessary duplication of policies as per the NPPF
Who	Miller Homes

raised the issue	
No. raising the issue	1
Council response	Although both EN2.C and D4 refer to heritage assets, the primary focus of EN2.C, which distinguishes it from D4, is on the avoidance of detrimental impacts on landscape features. It is not deemed that there is any substantial duplication across EN2 and D4.

Issue	Policy should be supported by further evidence and allow mitigation to be considered within a planning balance
Who raised the issue	SEGRO
No. raising the issue	1
Council response	It is unclear what evidence to support a development management policy like this would be. The policy allows mitigation to be considered in determining the level of impact. However, if the inspectors felt that it would be helpful to amend the policy or reasoned justification to specifically refer to mitigation then the council would support this.

Issue	Strengthening of monitoring, management and enforcement required
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	This comment relates to the implementation of the policy rather than the policy itself.

Issue	EN2 fails to acknowledge that unavoidable landscape impacts of some developments may be acceptable if they are balanced against national or regional needs for digital infrastructure, such as data centres
Who raised the issue	Everwell Development and Mactaggart Family & Partners
No. raising the issue	1
Council response	This comment misunderstands how policies are applied. Section 38(6) allows a determination of whether a proposal is in accordance with the local plan read as a whole, bearing in mind that policies may pull in different directions. The legal framework also allows other material considerations including national policy to outweigh conflict with local plan policies or specific identified harms.

4.114. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
The policy should be modified to state that certain proposals for essential digital infrastructure may be supported where residual landscape effects are outweighed by demonstrable national or regional need.	Everwell Development and Mactaggart Family & Partners
Change "development shall avoid" to "development should seek to avoid"	Rosconn Group
Policy should be supported by further evidence and allow mitigation to be considered within a planning balance	SEGRO
Add acknowledgment of or requirement for mitigation measures to enable robust proposals to come forward	Miller Homes (Brownsover Road)
<p>Council response to modification proposals: For the reasons explained above, the council does not support these modifications.</p> <p>It is not appropriate nor would it be consistent with national policy for a landscape policy to seek to apply a different standard to a particular category of development such as data centres.</p>	

POLICY EN3 RAINSBROOK VALLEY LANDSCAPE OF ELEVATED SENSITIVITY

4.115. 14 representations on behalf of 312 people or organisations argued that policy EN3 is unsound. 15 representations on behalf of 898 people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Policy is politically motivated and not based on justified evidence.
Who raised the issue	Edwards, Claire
No. raising the issue	1
Council response	The policy is supported by a landscape sensitivity assessment (EN3) undertaken by a suitably qualified team at an independent consultancy. The assessment method (which accords with relevant national guidance), findings, and analysis are transparently laid out in the report, which the council deems to constitute sound evidence that justifies the policy.

Issue	Policy conflicts with NPPF 11a to promote sustainably located development - avoids highly sustainable urban edge sites and led to increased Green Belt allocations.
Who raised	Edwards, Claire

the issue	
No. raising the issue	1
Council response	Policy EN3 does not inherently contradict NPPF paragraph 11a which specifies that plans should promote a sustainable pattern of development. The council considers that the strategy for homes and residential allocations it has proposed in the submission local plan represent a sustainable pattern of development.

Issue	Consideration should be given to development outside the designated area that could adversely impact its setting or views.
Who raised the issue	Cotton, Stephen & Dawn; J Marine Limited
No. raising the issue	3
Council response	The council deem that such a provision would be overly restrictive and not adequately supported by the available evidence.

Issue	Extent of the area designated should be larger and/or policy should specify that developments near to the area will not adversely impact it.
Who raised the issue	Barby and Onley Parish Council; Willoughby Parish Council; J Marine Limited
No. raising the issue	3
Council response	The area included extends to the administrative boundary of Rugby Borough Council to the south. The remit of the Rugby local plan does not extend into the neighbouring administrative area of West Northamptonshire, and the area cannot be extended in this direction. Through discussions with West Northamptonshire Council under the duty to cooperate, and as noted in the Statement of Common Ground with the same authority (SOCG8), we are exploring potential to have a joined-up approach across the administrative boundary in respect of the Rainsbrook Valley.

Issue	The policy is not based on proportionate evidence. The 2025 study is based on a flawed methodology that does not adequately account for differences across land parcels.
Who raised the issue	Tarrant, John; Kang, Jane; Dunchurch Park Estates Ltd
No. raising the issue	3
Council response	The Rainsbrook Valley Landscape Sensitivity Assessment (EN3) was undertaken by suitably qualified independent specialists and follows relevant guidance on the

	preparation of such studies. It takes a different methodological approach to the previous landscape study of the valley produced in 2017, which considered individual land parcels. It is noted in document EN3 in the introduction on page 5: “ <i>A previous Landscape Sensitivity Assessment was undertaken for a proportion of the valley in 2017. This report provides an up to date appraisal, using a methodology aligned to revised technical guidance published in the intervening period.</i> ” It goes on to specify that positions are taken in relation to the sensitivity and susceptibility of the Rainsbrook Valley as a whole.
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Issue	Policy approach unsound without ability to apply at site specific level. Policies D1, D3 and EN2 demonstrate that EN3 serves little purpose.
Who raised the issue	Persimmon Homes (Central)
No. raising the issue	1
Council response	We disagree. The Rainsbrook Valley Landscape Sensitivity Assessment (EN3) concludes the valley has elevated landscape sensitivity and this policy is designed to respond to this specifically.

Issue	Not consistent with key national policies including the presumption in favour of sustainable development.
Who raised the issue	Dunchurch Park Estates Ltd
No. raising the issue	1
Council response	The representation is critical of the introduction of policy EN3 and the evidence which underpins it. The council considers the evidence to have been appropriately prepared by qualified specialists. This work was commissioned following feedback and representations made at Regulation 18 stage, and underpins policy EN3. The council does not agree that this policy is in conflict with the presumption in favour of sustainable development or other national policy cited in the representation. The policy seeks to afford the area a higher degree of consideration in decision making.

Issue	Susceptibility based on vague and generic assumptions such as 'schemes of 50+ dwellings' - risk that this is based on a worst case scenario in terms of height and density
Who raised the issue	Dunchurch Park Estates Ltd
No. raising the issue	1
Council response	This comment refers to the evidence base, document EN3. The explanation for the type of development assumed is explained on page 63 of that document.

Issue	Limited differentiation between edge of settlement areas and open valley countryside
Who raised the issue	Dunchurch Park Estates Ltd
No. raising the issue	1
Council response	The map on page 65 of document EN3 shows some differentiation in sensitivity at the settlement edge. Ultimately, this is a criticism of the detailed findings of the study. The council does not agree with that criticism.

Issue	<p>Policy approach unsound without ability to apply at site specific level. Policies D1, D3 and EN2 mean that EN3 serves little purpose.</p> <p>The representation from Persimmon Homes is accompanied by a Landscape Sensitivity Assessment of Land East of Barby Lane (RPS 2026). The evidence submitted by the omission site promoter states that the omission site has medium/low sensitivity - consistent with Lepus study.</p>
Who raised the issue	Persimmon Homes (Central)
No. raising the issue	1
Council response	<p>The sensitivity of individual land parcels within the area may differ, and this is reflected in the map on page 65 of document EN3. That doesn't remove the rationale for having a policy for the area.</p> <p>The council's view is that the valley is a recognisable (and locally recognised) landscape with heightened sensitivity that warrants additional policy beyond the baseline DM policies referred to that would apply everywhere in the borough.</p>

4.116. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Additional wording to para F to provide direct connections from Diamond Jubilee Wood Country Park to the PRow network between Barby, Dunchurch and Hillmorton	Jurdzinski, Marcin
Strengthening and clarification of policy wording and expansion of area covered needed e.g. need to define 'adverse impact' and link to strategic policies and policies EN5 and I5	Hillmorton Voice Residents Association; Grandborough Parish Council; Jackson, Carin; Cotton, Stephen & Dawn
Refer to section 7.0 in accompanying report - Landscape Sensitivity Assessment and Review of the Rainsbrook Valley.	Persimmon Homes (Central); Catesby Strategic Land

Should be modified so as not to prohibit, limit or determine that the area is unsuitable for development.	
Should include access for horse riding on the Great Central Walk to avoid riders having to navigate busy roads	British Horse Society
Modify the policy area so that only highly sensitive landscape areas are included within it/exclude areas of lower sensitivity	Tarrant, John; Kang, Jane; Dunchurch Park Estates Ltd
Increase the extent of the area to cover the valley in full (in cooperation with West Northamptonshire) and/or amend the policy to specify that developments near to or outside of the area should not adversely impact it.	Barby and Onley Parish Council; Willoughby Parish Council; Stand against Lodge Farm village; J Marine Limited
Clarify the policy wording to specify whether the valley is a valued landscape.	Tarrant, John; Kang, Jane
Remove reference to Dunchurch Lodge as this duplicates heritage policy	Dunchurch Park Estates Ltd
Policy should make clear that temporary 'pods' in the grounds of Dunchurch Park Hotel cannot be made permanent & that any development of this site would need to undergo the same scrutiny as any other proposed development in Rainsbrook Valley	RBC Conservative Group
Policy should reflect that the Rainsbrook Valley Railway might need to add or change buildings to accommodate visitors and/or heritage equipment from time to time and policy should not block this	RBC Conservative Group
Council response to modification proposals: The comments seek either to widen or narrow the geographical scope of the policy, exempt or remove reference to certain sites or areas, or to strengthen or weaken its wording. The council does not support these amendments and considers that the policy is justified without amendments.	

POLICY EN4 AREAS OF SEPARATION

4.117. 13 representations on behalf of 15 people or organisations argued that policy EN4 is unsound. 14 representations on behalf of 897 people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Lack of justification for omission of Newton from this policy.
Who raised the issue	Dixon, Chris; Allanach, Richard
No. raising the issue	2
Council response	The reason for not assessing a potential area of separation between Newton and Rugby is given in paragraph 3.12 of the Areas of Separation Report (EN4) which states "The potential area of separation between Rugby and Newton would be reduced to a very small size should the allocations that are proposed in the emerging local plan proceed. Accounting for this, and given the presence of the Great Central Walk Local Nature Reserve and the Coton Park Pool Local Wildlife Site, which already act to constrain development, it is considered that an area of separation in this location is unlikely to serve

	a significant role.”
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Issue	EN4 is unsound because it is not based on proportionate evidence, fails to meet the tests of justification and effectiveness, and is not supported by national policy. The Areas of Separation Study does not robustly support the extent of the Area of Separation and does not justify the proposed boundary.
Who raised the issue	Mr and Mrs Wheeler the landowner of Land west of Medda Place; Archdiocese of Birmingham; Warwickshire Property and Development Group (site 90); Richborough Commercial (M45 J1); Warwickshire Property and Development Group (site 18)
No. raising the issue	6
Council response	<p>Although no reference is made to areas of separation (or equivalent concepts under different names) within national planning policy or guidance, this does not inherently mean that such a policy cannot be introduced locally. Indeed, many such policies are currently adopted by local authorities, including several of Rugby Borough’s neighbouring authorities. Furthermore, the concept of areas of separation is broadly consistent with numerous provisions of the NPPF, including those outlined in paragraphs 20, 135 and 187.</p> <p>It is deemed that the policy is adequately justified by the Areas of Separation Study Report (EN4). The report sets out a methodology, applies this methodology with data gathered through desktop research and site visits, and then recommends potential boundaries based on an analysis of the study findings. Likewise, it is deemed that the Areas of Separation boundaries proposed by the policy are justified by the study, which identifies the land within the boundaries as playing a role in maintaining settlement separation.</p>

Issue	Area of separation on Rugby Town policies map shows overlap of land owned by Homes England and Taylor Wimpey proposed for development as part of South West Rugby.
Who raised the issue	Homes England; Taylor Wimpey Strategic Land; Taylor Wimpey (Dunchurch)
No. raising the issue	3
Council response	A minor modification has been requested to amend the area of separation boundary, as detailed in the ‘Schedule of suggested modifications’ (CD20). This amendment has been drawn against the latest available masterplan for South West Rugby as a reference. The area that includes the Homestead Link Road and its adjacent green landscaping remains within the area of separation; this is identified as a buffer zone in the South West Rugby Masterplan SPD, and it is deemed appropriate for it to be covered by the Areas of Separation designation.

Issue	Area of Separation around Clifton is unjustified by proportionate evidence (including because areas of high flood risk already prevent coalescence with Rugby)
Who raised the issue	Archdiocese of Birmingham; Richborough (Clifton upon Dunsmore)

No. raising the issue	2
Council response	The Areas of Separation Study Report (EN4, pp. 13-14) acknowledges that there are areas between Clifton-upon-Dunsmore and Rugby that are within Flood Zones 2 and 3. However, it is not deemed that their presence annuls the case for a designated Area of Separation between the two settlements.

Issue	South West Rugby is already causing Dunchurch to be absorbed into Rugby by removing the separation - this has been tested at examination of the adopted local plan and there is no rationale to retain superficial separation along this boundary.
Who raised the issue	Taylor Wimpey (Dunchurch)
No. raising the issue	1
Council response	<p>While the development of South West Rugby will reduce the degree of separation between Dunchurch and Rugby, it is not agreed that Dunchurch will be ‘absorbed’ into Rugby as a result. This position is acknowledged in Policy DS8 of the adopted local plan which states “Development proposals shall respect and maintain a physical and visual separation between Rugby town and Dunchurch to prevent coalescence and protect their individual character and identity. A significant buffer between Rugby and Dunchurch, which incorporates a Green Infrastructure Corridor from Cock Robin Wood to Cawston Spinney, as identified in the South West Rugby Masterplan SPD, must form an integral part of proposals for the site.”</p> <p>It is not agreed that the degree of separation which policy EN4 seeks to protect, which includes the buffer previously established by policy DS8, as well as additional land identified by the Areas of Separation Study Report, is superficial. This separation is of importance to prevent the coalescence of Rugby and Dunchurch and is valued by a substantial proportion of residents, particularly those of Dunchurch, as evidenced by consultation responses.</p>

Issue	B4429 and M45 already provide a clean break between Thurlaston and Rugby making an Area of Separation unjustified.
Who raised the issue	Taylor Wimpey (Dunchurch)
No. raising the issue	1
Council response	The role that the B4429 (Coventry Road) and M45 play as physical features of separation between Rugby and Thurlaston is acknowledged in the Areas of Separation Study Report (EN4). However, it does not follow that if development were to occur on either side of these roads within the proposed Area of Separation, that the degree of separation of the village from the town would not be diminished.

Issue	Lack of consultation on policy prior to Reg 19 is contrary to the Council's Statement of Community Involvement and NPPF para 16 which advises that plan-making should "be shaped by early, proportionate and effective engagement between plan-makers and communities, businesses"
Who raised the issue	Richborough (Clifton upon Dunsmore); Warwickshire Property and Development Group (site 90); Warwickshire Property and Development Group (site 18)
No. raising the issue	3
Council response	The Statement of Community Involvement (SCI) specifies that a Regulation 18 consultation and Regulation 19 consultation will be undertaken for the local plan, each to last a minimum of 6 weeks. The Council has fulfilled this commitment; indeed, two Regulation 18 consultations were undertaken rather than one. It is not deemed that the SCI or the NPPF paragraph cited above are to be interpreted as meaning that no policies can be introduced between the Regulation 18 and Regulation 19 stages.

Issue	Evidence report does not list criteria used to assess "the identity and distinctiveness of settlements". Methodology lacks transparency and a scoring mechanism. Unclear what specialist technical input from heritage, conservation and landscape experts has been included. Disagreement with assessment of sites.
Who raised the issue	Richborough (Clifton upon Dunsmore); Midlands Land Portfolio; Warwickshire Property and Development Group (site 90); Richborough Commercial (M45 J1); Warwickshire Property and Development Group (site 18)
No. raising the issue	5
Council response	The Areas of Separation Study Report (EN4) was produced by planning officers without additional input from specialist heritage, conservation or landscape experts. There is currently no nationally prescribed method for assessing areas of separation (or similar concepts with alternative names), and therefore the methodology adopted was similar to that used in other published studies. It was not deemed necessary or a prudent use of public resources to commission additional specialist technical input on the implementation of this methodology, or the development of a policy whose primary purpose is to prevent the coalescence of settlements. Ultimately the decision about the contribution that land makes to maintaining separation, and therefore the proposed boundaries of the areas of separation, is a matter of professional judgement.

Issue	Creates quasi green belt in terms of key elements of its intended function. Potential significant consequences for securing sustainable development in areas which are not incumbered by a green belt designation. Site doesn't meet bar for Green Belt designation.
Who raised the issue	Midlands Land Portfolio; Richborough Commercial (M45 J1)
No. raising the issue	2
Council	Local areas of separation policies (or similarly named local designations that serve a

response	similar purpose) are well established. Many adopted local plans feature such a policy, including those of several of Rugby Borough's neighbouring authorities. It is deemed that the proposed policy is not the same as Green Belt policy and that the principle of its establishment is sound. Furthermore, it is not considered that the policy prevents a strategy for a sustainable pattern of development from being progressed, as is achieved by the local plan's proposed allocations.
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Issue	Policy not legal compliant because not considered in Sustainability Appraisal report and because council contrary to s19 PCPA 2004 failed to have regard to national policies and guidance issued by Secretary of State.
Who raised the issue	Richborough Commercial (M45 J1)
No. raising the issue	1
Council response	<p>It is not deemed that the policy does not have regard to national planning policies and guidance. As it acknowledged in the Areas of Separation Study Report (EN4) and in responses to prior representations, although no reference is made to areas of separation (or equivalent concepts under different names) within national planning policy or guidance, this does not inherently mean that such a policy cannot be introduced locally. Indeed, many such policies are currently adopted by local authorities, including several of Rugby Borough's neighbouring authorities. Furthermore, the concept of areas of separation is broadly consistent with numerous provisions of the NPPF, including those outlined in paragraphs 20, 135 and 187.</p> <p>The Sustainability Appraisal report at para 4.2.6 comments on the appraisal of development management policies as follows: "it is a challenge to define "reasonable" DM policy alternatives, and, in this case, none are identified following discussion with Officers". There is no issue of legal compliance in relation to this policy not being specifically assessed in the SA report.</p>

Issue	Argue policy wouldn't serve a clear purpose and there is no national policy support for such policies.
Who raised the issue	Richborough Commercial (M45 J1)
No. raising the issue	1
Council response	It is deemed that the policy serves the purpose of preventing the coalescence of settlements and protecting their identity and distinctiveness. Although no reference is made to areas of separation (or equivalent concepts under different names) within national planning policy or guidance, this does not inherently mean that such a policy cannot be introduced locally. Indeed, many such policies are currently adopted by local authorities, including several of Rugby Borough's neighbouring authorities. Furthermore, the concept of areas of separation is broadly consistent with numerous provisions of the NPPF, including those outlined in paragraphs 20, 135 and 187.

Issue	Policy is unsound as it is clear from the plan that all fields will be filled in with development between Bilton/Cawston and Dunchurch. Any area of separation must be so insignificant that it is not even visible on the plan. Dunchurch will become another suburb of Rugby town on the current plan.
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council response	Much of the area that currently separates Rugby from Dunchurch and Thurlaston will be occupied by the South West Rugby urban extension. However, it is not the case that this will cause any area of separation to be so insignificant that it is not even visible on the plan, as can be seen by the presence of the proposed area of separation on the policies map.

4.118. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Policy area should be expanded to include the gap to the west of Newton with Brownsover and Coton Park	Dixon, Chris
The Area of Separation boundary around Dunchurch and Thurlaston should be redrawn to exclude Sections A and B and instead define Coventry Road as the boundary.	Mr and Mrs Wheeler the landowner of Land west of Medda Place
Amend the policies map for this policy to reflect the application red line boundary for Homes England's parcel in South West Rugby and Taylor Wimpey's ownership	Homes England; Taylor Wimpey Strategic Land
Supporting text should recognise that Area of Separation forms part of the wider countryside and landscape framework	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Amend wording to strengthen application by requiring developments to maintain a clear and defensible physical and visual gap between settlements, with additional test for this (see rep for proposed wording)	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Amend supporting text to define 'significant adverse impact' (see rep for full suggested wording)	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Remove Area of Separation around Clifton, failing that amend wording to improve flexibility and allow for more housing to come forward around Clifton if required	Archdiocese of Birmingham
Delete reference to other 'existing developments' in section B and reference to 'an urbanising influence' in section C as this is not the purpose of an area of separation	Taylor Wimpey (Dunchurch)

Clifton area of separation should be continued north of its current boundary on Newton Manor Lane to abut the Great Central Way. It would then include St Thomas Cross Fields public open space and area of farmland west of the village.	Davis, Ian
A larger area of separation should be included so that there is a visible area of green land between Rugby town/suburbs & Dunchurch.	O'Connell, Mark
A purpose statement should be added to the policy: "The purpose of Areas of Separation is to maintain the physical and visual distinction between Rugby town and surrounding settlements, safeguarding their individual identity, preventing coalescence, and contributing to strategic green infrastructure connectivity".	Allanach, Richard
<p>Council response to modification proposals:</p> <p>As explained in the main issue responses, the council does not agree with the proposals to expand or retract the boundaries of the areas of separation, except for the minor modification at South West Rugby proposed by Homes England, which has been adopted into the schedule of suggested modifications (CD20). It is considered that the land which is covered by the proposed areas are of importance for maintaining settlement separation, and it is deemed that the rationale for excluding the area between Newton and Rugby from consideration, as stated in paragraph 3.12 of the study (EN4), still stands.</p> <p>It is not deemed necessary to specify that areas of separation form part of the wider countryside and landscape. Per the policies map, it is clear that the areas themselves and some of land that is adjacent to them is part of the countryside (per policy S5), for which policy EN2 (landscape protection) will also have a bearing.</p> <p>The council does not agree that references to existing developments (as they relate to cumulative impacts) and urbanising influences should be deleted from the policy. Both are deemed of relevance for decision-takers when considering the impacts that proposed developments may have on the effectiveness of the proposed areas of separation.</p> <p>It is deemed that the purpose of the policy in preventing the coalescence of settlements and protecting their distinct identities is already made adequately clear. The policy is not designed to contribute to green infrastructure connectivity and therefore it is not considered appropriate to amend the policy to reflect this purpose.</p>	

POLICY EN5 BIODIVERSITY NET GAIN

4.119. Seven representations on behalf of seven people or organisations argued that policy EN5 is unsound. Four representations on behalf of four people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	10% is too low due to existing low woodland cover - 20% would be more appropriate
Who raised the issue	Woodland Trust

No. raising the issue	1
Council response	The council has considered the potential to set a higher percentage as it is understood some councils are pursuing. However, it has elected not to pursue such a policy. This decision does not raise an issue of soundness with the plan submitted.

Issue	Management plans should be secured by condition or legal agreement, monitoring responsibilities should be clearly defined, and enforcement triggers should be explicit where outcomes fall short.
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	This matter is more appropriately addressed at planning application stage.

Issue	Oxford Canal and scarp edge in Hillmorton should be designated as green/blue infrastructure corridors as in the 2019 Local Plan.
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	These areas were not designated as green/blue infrastructure policies in the 2019 Local Plan but as “potential corridors”. The council took the view that the 2019 policy did not clearly set out how decision makers should respond to proposals in this area. Therefore, the council has proposed a clearer policy for this area in Policy EN3. This comment does not raise an issue of soundness.

Issue	Oxford Canal in Hillmorton should be designated as a conservation area and wildlife corridor to mirror assessment made by West Northamptonshire Council.
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	Noted. It is the Council’s intention to commission a Conservation Area Appraisal of the Oxford Canal, though this will be separate from the local plan process.

Issue	Policy duplicates requirements of Environment Act and/or national policy and should be deleted.
Who raised	Barberry Ansty Limited; Tritax Park Rugby West Limited; Vistry Group

the issue	
No. raising the issue	3
Council response	This is not correct. The policy sets locally specific policy in its reference to the Local Nature Recovery Strategy and to delivering off-site mitigation within the borough.

Issue	Doesn't accord with NPPF para 193
Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	<p>The representor's argument is that the policy does not accord with national policy. The representor argues that credits can be purchased anywhere and this should be left to developer's discretion provided NPPF para 193 is passed.</p> <p>The representor's comment does not explain why there is perceived to be a conflict with para 193 NPPF as this is not apparent. There is no conflict with national policy in the council setting out where it would want to see biodiversity net gain delivered.</p>

Issue	Mitigation of biodiversity loss by passing gains to other sites is not sufficient to protect sites in the borough.
Who raised the issue	Foss, Jeremy
No. raising the issue	1
Council response	This comment is a criticism of the operation of the biodiversity net gain system under the Environment Act, it does not raise a soundness issue with the Rugby Borough Local Plan.

Issue	The pre-development biodiversity value of the site, which there should be a greater than 10% net gain on, is measured once the site has been prepared for development, not the original site prior to commencement of work.
Who raised the issue	Foss, Jeremy
No. raising the issue	1
Council response	This is not correct. However, this comment relates to the operation of the legislation rather than the soundness of the local plan.

4.120. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed

modifications.

Modification summary	Proposer(s)
Amend para 5.11 supporting text to delete words "a minimum" before 10% to align with Environment Act	Barberry Ansty Limited
Council should reserve the right to amend policy text to reflect anticipated legislative changes	Avon Timber Builders Ltd
Biodiversity should be protected within the bounds of a site, not passed to other sites.	Foss, Jeremy
<p>Council response to modification proposals: The words “a minimum” do not create any conflict with national policy of legislation, they merely demonstrate that the council is receptive to proposals for BNG that is higher than the statutory floor.</p> <p>The council cannot amend a policy other than through the local plan process.</p> <p>The council’s response to Mr Foss’ comment is set out above.</p>	

POLICY EN6 CANOPY COVER

- 4.121. 15 representations on behalf of 19 people or organisations argued that policy EN6 is unsound. Three representations on behalf of 136 people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Lack of explicit reference to location of canopy cover delivery, in addition to quantity. Tree Equity Scores should be referenced, requiring minimum 75 for each LSOA.
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	The policy would only be applied in the determination of planning applications. Therefore, the location of the canopy cover would be determined by where planning applications to which it is applicable are submitted.

Issue	Management plans should be secured by condition or legal agreement, monitoring responsibilities should be clearly defined, and enforcement triggers should be explicit where outcomes fall short.
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	Noted. The suggested requirements are considered relevant to the determination of planning applications and are beyond the scope of the local plan.

Issue	20% canopy cover is onerous and will make sites unviable and/or lacks sufficient evidence to demonstrate its achievability and justification.
Who raised the issue	Inside Land Group; Tritax Park Rugby West Limited; William Davis Homes (site 315); Vistry Group; Catesby Estates (Site 136); Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	6
Council response	<p>The viability of the policy was considered in the viability study (document I1) which applied cost allowances for green roofs as a proxy for the policy. Justification of the policy is the low level of existing tree canopy in the borough and the clear benefits of tree canopy to health, air quality and climate change adaptation and mitigation.</p> <p>It should be noted that similar policies have been implemented in adopted local plans in Cornwall and Colchester.</p> <p>Para 5.17 of the supporting text makes clear that the policy will not be applied in a doctrinaire way and there may be circumstances in which it cannot be achieved. However, this does not undermine the reasons for having the policy.</p> <p>It is also important to recognise that street trees, biodiversity net gain areas and natural and amenity green spaces under open space policy can all contribute to meeting this target.</p>

Issue	Planning at the required scale may not be deliverable together with required floorspace on all sites where there are constraints like easements and flood risk.
Who raised the issue	Manse Opus and Sir Thomas Whire's Charity; Barberry Ansty Limited
No. raising the issue	2
Council response	As noted above, para 5.17 of the supporting text recognises that there are some sites for which this will not be possible.

Issue	Policy wording is inflexible and may create uncertainty at application stage
Who raised the issue	West Midlands Housing Association Planning Consortium
No. raising the issue	1
Council response	Policy wording either requires something or it doesn't. If it is expressed as optional, then it is guidance not policy. This policy aims to give clarity about what is required. However, policies are not statutes and the decision making framework allows other material considerations and site-specific cases as to why a policy cannot be achieved to be made. Paragraph 5.17 specifically envisages this may happen.

Issue	Further evidence required to demonstrate how the requirement could be delivered alongside other policy requirements - e.g. EN5
Who raised the issue	Mackenzie Miller Homes
No. raising the issue	1
Council response	As noted above, the requirements of EN5, EN6 and open space through W2 are not mutually exclusive categories. Street trees, biodiversity net gain areas and natural and amenity green spaces under open space policy can all contribute to meeting this target.

4.122. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend section A to specify that 20% canopy cover will not be required where it is demonstrated to be incompatible with the minimum amount of required development and/or delivering BNG.	Inside Land Group
Amend paragraph A to require "approximately" 20% canopy cover and to add: or where it is deemed not possible or desirable under individual site circumstances, an alternative level of canopy cover will be negotiated with the council.	Manse Opus and Sir Thomas White's Charity; Mackenzie Miller Homes
Incorporate wording of supporting text at paragraph 5.17 into the policy	Barberry Ansty Limited; West Midlands Housing Association Planning Consortium; Panattoni and AC Lloyd
Amend wording to say "shall seek" to increase post-development canopy cover "where possible"	Rosconn Group; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
Delete words "to at least 20% of the site area" and "Where the canopy cover of the site exceeds 20% before development, the proposal should ensure retention of at least the existing level of canopy cover."	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
Add further paragraph to require major development proposals to demonstrate	Dunchurch Parish

how canopy cover will be established, maintained and protected for minimum 30 years (see rep for full suggested wording)	Council, Thurlaston Parish Council and Action4Dunchurch
Delete para 5.19 which is irrelevant to the policy it is supposed to support, but which does not make the policy unsound.	Allanach, Richard
<p>Council response to modification proposals:</p> <p>The first five proposed amendments above seek to varying degrees to dilute the policy or introduce greater flexibility. For the reasons explained above the council does not agree that these modifications are needed to address an issue of soundness.</p> <p>Dunchurch Parish Council and others propose a maintenance period. Given that canopy cover is likely to form part of biodiversity net gain areas and/or public open space under policy W2, which contain requirements for maintenance periods, a separate maintenance provision requirement under the canopy cover policy is considered unnecessary.</p> <p>The council does not agree with the deletion of para 5.19 of the reasoned justification.</p>	

POLICY EN7 FLOOD RISK

4.123. Eight representations on behalf of eight people or organisations argued that policy EN7 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Policy is inconsistent with new national policy that sequential test need not apply where a site-specific flood risk assessment demonstrates that a site can be safe for lifetime and not increase flood risk elsewhere.
Who raised the issue	Tritax Park Rugby West Limited; Miller Homes (Brownsover Road)
No. raising the issue	2
Council response	There is no inconsistency. Paragraph A of the policy clearly defers to national policy. National policy includes the above mentioned statement.

Issue	Parts A and B repeat national policy.
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	The policies signpost to national policy, they do not repeat it in any substantive way.

Issue	Part C prevents any development within 8m of a watercourse - does not account for infrastructure which may be needed such a culvert for drainage.
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	The reference “built development” would implicitly exclude drainage works or other infrastructure.

Issue	Policy would conflict with allocated development coming forward e.g. site 64 requires access ways to cross a watercourse.
Who raised the issue	Panattoni and AC Lloyd
No. raising the issue	1
Council response	This raises the same issue as the preceding one, see above response.

4.124. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend policy so it is consistent with national policy that sequential test need not apply where a site-specific flood risk assessment demonstrates that a site can be safe for lifetime and not increase flood risk elsewhere.	Tritax Park Rugby West Limited; Miller Homes (Brownsover Road)
Add text to part C to allow development within 8m edge of a watercourse where effective realisation of an allocation relies on the crossing or of other works to an existing watercourse or main river	Panattoni and AC Lloyd
Add stronger wording of enforcement within the plan to ensure that drainage is not missed or becomes an after thought	O’Connell, Mark
<p>Council response to modification proposals: As stated above, there is no inconsistency with the national policy mentioned.</p> <p>In relation to development within 8m of a watercourse, the council considers it implicit that this would not prevent drainage works and other site infrastructure. However, if the inspector(s) consider it necessary to make this explicit through modification of the policy text or addition to the reasoned justification then the council would not oppose that.</p> <p>The policy is applied through the determination of planning applications; in this context it is not clear what the respondent means by stronger enforcement.</p>	

POLICY EN8 ENVIRONMENTAL PROTECTION AND AMENITY

4.125. No main issues were identified for policy EN8. Four representations on behalf of four individuals or organisations argued the policy is unsound on the basis that proposed site allocations would not accord with it. Three representations on behalf of three people or organisations argued that the policy is sound.

POLICY EN9 AIR QUALITY

4.126. One representation argued that policy EN9 is unsound and should be modified (see below) and one representation argued that the policy is sound.

4.127. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Plan needs to detail the methods to maintain air quality, it's measurement over periods of time, the mandates to developers in order to maintain or improve air quality, the factors and causes to be monitored and what pollutants are to be included.	Foss, Jeremy
Council response to modification proposals: This is considered to be a greater level of detail than the plan would provide. The supplementary planning document referred to at paragraph 5.31 provides some of this detail. No modification is considered necessary to address an issue of soundness.	

POLICY H1 HOUSING MIX

4.128. Eight representations on behalf of eight people or organisations argued that policy H1 is unsound. Five representations on behalf of five people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	The exact reference to Housing Needs Evidence (2025) is too rigid and risks becoming outdated within the plan period
Who raised the issue	Davidsons Homes; Vistry Group
No. raising the issue	2
Council response	Part A of the policy references the Housing Needs Evidence (2025) (SD3) and “...any other appropriate local evidence.” This would allow for updated evidence to be referenced.

Issue	The table at 6.1 includes for an element of social or affordable rent for over 65s. Policy H2 sets out a mix for social rent and shared ownership. No guidance given regarding the split of rented element of housing that should be for over 65s (between social rent and shared ownership). Clarification requested.
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Who raised the issue	Tritax Park Rugby West Limited
No. raising the issue	1
Council response	<p>Table 6.1 refers to the evidence set out in the Updated Housing Needs Evidence (2025) (document SD3). It specifies a 50/50 split of 1 and 2 bedroom social or affordable rent homes for persons 65 and over.</p> <p>Document EN3 does not provide a target for the proportion of social or affordable rent housing that is for over 65s. Therefore, table 6.1 should be understood as providing evidence on the unit size mix for over 65s rented affordable housing, where this is provided.</p>

Issue	Given the emphasis in this plan on creating large employment sites with mainly low paid workers, the mix of affordable housing will be insufficient. It is also counter to H8 with regards to HMOs because the unavailability of affordable housing will increase the use of HMOs in the area.
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council response	<p>The housing needs of the borough is identified in the Housing Needs Evidence (SD3) as set out in the policy, and the Homes-Jobs Alignment Paper (I2) addresses the inter-relationship between homes and jobs.</p> <p>A similar comment relating to policy H8 (HMOs) is addressed under the main issues attributed to that policy.</p>

4.129. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend policy with a new paragraph C to state "New housing development comprising only of affordable houses shall provide a mix of housing type and size and shall meet the provisions of Policy H2(B-E)."	Inside Land Group
Amend policy wording so it refers to the latest housing evidence, instead of Housing Needs Evidence (2025)	Davidsons Homes; Davidsons (Long Lawford); Newton LDP; Avon Timber Builders Ltd
Clarify what proportion of housing should be for over 65s	Tritax Park Rugby West Limited
Amend policy to allow for flexibility of mix depending on local circumstances	Vistry Group

Volume of affordable housing required to be increased significantly if more warehouses and similar employment sites continue to be built and policy H8 is to be implemented	O'Connell, Mark
Council response to modification proposals:	
<p>The council does not consider an amendment to cover wholly affordable schemes is needed.</p> <p>As referenced in the main issues section above, the policy already offers flexibility for specific circumstances or changes over time by permitting the use of “any other appropriate local evidence”, as defined in supporting text 6.3, in informing housing mix. In combination with H2, it is considered this policy provides sufficient guidance in determining the starting points for appropriate housing mix.</p>	

POLICY H2 AFFORDABLE HOUSING

4.130. Thirteen representations on behalf of thirteen people or organisations argued that policy H2 is unsound. Four representations on behalf of four people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Viability assessment underestimates cost of former agricultural land, artificially increasing greenfield and Green Belt affordable housing deliverability
Who raised the issue	Edwards, Claire
No. raising the issue	1
Council response	The viability assessment explains how benchmark land values are calculated. They are not considered to be over-inflated.

Issue	Cost of BNG is not factored into the costs of delivering affordable housing on Green Belt land
Who raised the issue	Edwards, Claire
No. raising the issue	1
Council response	The Viability Report (I1) factors in policy compliance of the whole plan and concludes that 40% affordable housing can viably be accommodated on land released from the green belt in most scenarios (see key findings in para 1.7).

Issue	Policy is focused on housebuilders' viability rather than residents' needs - affordable housing more appropriate in sustainable and well-connected areas with access to amenities
Who raised	Edwards, Claire

the issue	
No. raising the issue	1
Council response	This comment is considered as opposition to provision of affordable homes in settlements beyond Rugby, as policy H2 indicates a higher proportion of affordable housing should be provided on sites 'elsewhere in the borough' than in the Rugby urban area. This is similar in principle to the approach in adopted policy on affordable housing in the current local plan, and draws upon evidence presented in the Viability Study (I1).

Issue	Policy should not apply to villages. Provision at villages to meet needs of those with a social connection should be under H4
Who raised the issue	CPRE
No. raising the issue	1
Council response	<p>We disagree. Given the acute affordable housing need in the borough identified in the Updated Housing Needs Evidence (SD3), it is considered appropriate for affordable housing to be brought forward in a range of locations. This is consistent with existing policy in the adopted local plan, and viability evidence (I1) that a greater proportion of affordable housing can generally be viably supported outside the urban area of Rugby.</p> <p>Furthermore, additional requirements for affordable housing on land released from the green belt (including green belt land releases around villages) are set out in national policy (NPPF paragraphs 67 and 68). To exclude villages from this policy would therefore be inconsistent with the NPPF.</p>

Issue	Shortfall of approximately 10 affordable homes per year based on the targets and correct requirement figures
Who raised the issue	Mr and Mrs Hudson
No. raising the issue	2 (1 representation)
Council response	This comment is framed within a representation in relation to policy S2, which essentially argues that allocations in the spatial strategy would not deliver to meet the evidenced affordable housing need, and argues for an uplift in overall housing provision. This is already addressed in response to policy S2 above, and evidenced in the Development Needs Topic Paper (SD11).

Issue	Council applying a constrained approach - fails to support existing housing projections. No evidence base for the number of affordable homes over the plan period. It is reliant on large sites (e.g. SW Rugby) where achievability contested.
Who raised	Persimmon Homes (Central)

the issue	
No. raising the issue	1
Council response	<p>This representation challenges inputs to the Updated Housing Needs Evidence (SD3) and paragraph 2.50 of the Development Needs Topic Paper (SD11). It argues that local housing need fails to support existing population projections and would lead to increased out-migration through under delivery, especially when considered in the context of a lack of affordable housing achievability on strategic scale sites.</p> <p>Given that the same representation (at para 9.3) states agreement with the proportions of affordable provision within the policy (part A) and the proposed tenure split (part B), and the representation conclusion is that additional allocations should have been included (specifically at Hillmorton), it is considered that these comments are already addressed under policy S2 above.</p>

Issue	Exclusion of older persons' housing from this requirement is unsound. Sites where it would be unachievable should be removed
Who raised the issue	Willis, Tim
No. raising the issue	1
Council response	<p>The exclusion of specialist older persons accommodation from part A of the policy is based on the viability assessment (document I1) the appraisal results of which show housing for the elderly typologies as unviable in all scenarios tested. This is also consistent with the adopted CIL charging schedule and the evidence that underpinned it.</p> <p>The Updated Housing Needs Assessment (SD3) sets out the evidence of local need for this type of housing. It is therefore considered that this strikes a balance to allow specialist older persons accommodation to come forward.</p>

Issue	Greater flexibility needed in the policy text to ensure the policy is applied proportionately and remains effective under different site-specific circumstances
Who raised the issue	Richborough (Long Lawford); Miller Homes; Places for People; Rosconn Group
No. raising the issue	4
Council response	<p>Representations challenge that the flexibility described in paragraphs 6.5 and 6.6 of the supporting text are not incorporated in the policy text, and that this flexibility is fundamental to ensuring the policy is flexible and consistent with national policy. They argue that the policy is unsound without modification to address this. The Council considers that the supporting text is clear about how the policy will be applied. There is no inconsistency with national policy and no modification is needed. National policy at para 59 already sets out the circumstances in which departures from local affordable housing</p>

	policy may be justified, there is no need to repeat this in local plan policy.
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Issue	Policy will not deliver the 75% provision identified in the Housing Needs Evidence due to being led by viability not need
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	This representation asserts that the projected affordable housing would not meet the identified need, and does not explicitly challenge the content of policy H2 itself. It is considered that this issue is addressed under policy S2.

Issue	Viability assessment should test typologies of 200-500 homes as there are 5 allocations in this size range. Errors in Lodge Farm appraisal assumptions also argued.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	<p>These points are addressed in Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation (document I15).</p> <p>The Local Plan Viability Study (I1) tests a range of sites from 5 units to 700. At the larger end of this scale, we have tested schemes of 200, 500, 600 and 700 units. The representation appears to be suggesting that the viability of schemes that sit somewhere between the range of 200 to 500 units would be markedly different from the outputs of the lower and higher end of the range.</p> <p>Document I15 tests and amended Typology 16 to 300 and 400 units and the outputs for price point I (£4,325 per square metre), together with the outputs for the original Typology 16 (200 units) and 18 (500 units). As would be expected, the residual land values for 300 and 400 units sit in between the range previously identified by the appraisals for 200 and 500 units.</p>

Issue	Inconsistency between policies H1 and H2 - no reference to affordable rent under H2 but is referred to under H1. Wider pool of options helps meet local need more effectively
Who raised the issue	West Midlands Housing Association Planning Consortium
No. raising the issue	1
Council response	The Updated Housing Needs evidence (SD3) sets out the evidence for policy H2. It identifies the greatest need for social rented housing.

	With specific reference to affordable rent, paragraph 5.78 of SD3 suggests that homes for affordable rent may be accepted where supported by site specific evidence. Adjustments to tenure (in addition to unit size and mix) which may form part of an open-book viability assessment, are referenced in paragraph 6.5 of the policy's supporting text.
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Issue	Instances of difficulty sourcing tenants for affordable housing in areas with limited public transport access
Who raised the issue	West Midlands Housing Association Planning Consortium
No. raising the issue	1
Council response	Noted. The development strategy seeks to direct development to the town of Rugby and Main Rural Settlements. The Rural Sustainability Study (SD14) considers public transport provision amongst the assessment of each settlement.

Issue	Criteria D and 6.7 for offsite financial contribution is not consistent with national policy - NPPF Annex 2 confirms Affordable Private Rent should normally be delivered onsite and managed by a Build to Rent landlord
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	<p>This comment relates to the exception for Build to Rent schemes in H2 D and 6.7 whereby they are permitted to make an off-site financial contribution as their affordable housing contribution. NPPF Annex 2 states that within Build to Rent schemes affordable housing for rent “is expected to be the normal form of affordable housing provision”, known as Affordable Private Rent. The NPPF annex does not state that this type of accommodation should normally be delivered on site.</p> <p>Policy H2 sets out the basic tenure mix for affordable housing delivery as 70% social rent and 30% shared ownership. Social rent is prioritised over affordable rent (or affordable private rent) because it better addresses the acute need for lower-cost housing in the Borough as evidenced in document SD3. Table 5.11 in document SD3 shows that only 16% of households who are unable to afford market housing can afford 80% of market rent without benefit support, whereas 48% can afford social rent without benefit support. Neither social rent nor shared ownership is suitable for on-site delivery within build to rent schemes.</p> <p>Given the local evidence of need for social rented schemes, it is considered justifiable that this should be prioritised over affordable private rent. When coupled with the different financial model of built to rent schemes as referenced in 6.7 this is felt to justify accepting off-site financial contributions.</p>

Issue	Rationale for 40% affordable housing on Green Belt sites is unclear
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Who raised the issue	Avon Timber Builders Ltd
No. raising the issue	1
Council response	Paragraph 67 of the NPPF requires a specific policy requirement for the proportion of affordable homes on green belt land or land to be released from the green belt. Part (a) identifies that this should be higher than on other land not in the green belt. Part (b) requires at least 50% of housing on such land to be affordable, unless it can be demonstrated as unviable. The Viability Appraisal (I1) concludes that the proposed policy requirements of affordable housing may be viably absorbed in most scenarios alongside the cumulative effect of policies within the plan, with paragraph 1.7 specifically identifying (2nd bullet) that “...developments on sites released from the Green Belt should be able to accommodate 40% affordable housing.”

Issue	Policy will not deliver the amount of affordable housing required as shown by the evidence and is therefore inconsistent with national policy.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	This representation challenges whether the projected affordable housing would meet the identified need and does not challenge the content of policy H2 itself. It is considered that this issue is addressed under policy S2.

4.131. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
In villages, affordable housing should be delivered on small infill sites or rural exception sites	CPRE
In criteria A delete "at least" and replace "shall" with "should"	Miller Homes
Amend policy wording to reflect paragraphs 6.5 and 6.6 and allow level and mix of affordable housing to be informed by viability evidence for the specific site, with reduced level of provision accepted in cases of demonstrated non-viability	Richborough (Long Lawford); Places for People
Amend criterion B to include affordable rent and a broader range of affordable ownership products	West Midlands Housing Association Planning Consortium
Align wording with national policy on Green Belt development including application of the Golden Rules	Miller Homes (Brownsover Road)
Reduce requirement for Green Belt sites to 30%; or 35% for both Green Belt and 'elsewhere in the Borough'	Avon Timber Builders Ltd

Amend definition of affordable housing and social rent to align with NPPF definitions	Rosconn Group
Criteria E should be moved to supporting text	Miller Homes
Add supporting text to note that the policy is viability driven and will not meet the identified needs	Vistry Group
Amend the policy to require 30% affordable housing across the borough for developments that result in ten or more new homes, and 50% for all Green Belt sites (including those of fewer than ten homes).	Allanach, Richard
<p>Council response to modification proposals: The affordable housing proportions required by the policy have been designed to help meet the Borough’s acute need, while ensuring development remains viable. The levels have been informed by the Local Plan Viability Study (I1) and introducing further flexibility undermines the ability of the policy to address affordable housing need, while increasing proportions risk under-delivery of residential sites. Supporting text 6.8 notes that the tenure mix in B is the council’s starting point but that other mixes may sometimes be appropriate.</p> <p>It is not necessary to amend the policy to introduce greater flexibility for individual developments to make a viability case for a lower proportion of affordable housing because the NPPF para 59 already does this:</p> <p>“Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force.”</p> <p>Other comments are addressed in responses to the main issues above. Overall, no modifications are needed.</p>	

POLICY H3 RURAL WORKER DWELLINGS

4.132. No representations were received in respect of this policy.

POLICY H4 RURAL EXCEPTION SITES

4.133. No main issues have been attributed to this policy. One representation on behalf of one person or organisation argued that the policy is unsound, however this response was an objection to development in Wolvey and did not raise specific issues with this policy. One representation on behalf of one person or organisation argued that the policy is sound.

POLICY H5 REPLACEMENT DWELLINGS

4.134. No representations were received in respect of this policy.

POLICY H6 SPECIALIST HOUSING

4.135. Three representations on behalf of three people or organisations argued that policy H6 is unsound. The main issues for this policy are listed below.

Issue	Missed opportunity to allocate further sites for older persons housing which are suitable for apartments and closer to local amenities
Who raised the issue	Churchill Living & McCarthy Stone
No. raising the issue	1
Council response	The representation notes support for the policy overall but suggests that the two sites identified for older persons accommodation are likely to take the form of bungalows on the edge of settlements. However, the identified development principles of the sites (sites 337 and 136) are clear that these are not limited to bungalows, and whilst they are located on the edges of Brinklow and Wolston, they are considered to be within relatively close proximity to local facilities.

Issue	No justification for specifying sites to deliver serviced self-build or custom build plots
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	<p>The representation is principally concerned with a lack of evidenced demand in relation to the requirement in part C of the policy requiring self and/or custom build homes at land at Coventry Road, Wolvey. The representation argues there is no evidenced demand in this location.</p> <p>Paragraph 6.20 notes evidence of continued demand for self and custom build plots across the borough. Whilst only one entrant has listed only Wolvey specifically (and another Wolvey/Brownsover) on the April 2025 version of the self and custom build register, it is also noted that multiple entrants identify ‘anywhere’ or ‘village’ or other more general location categories.</p>

4.136. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend part C to read "residential developments shall provide serviced self-build and / or custom build plots as part of the development where there is evidence of unmet need within a specific location"	Rosconn Group
Council response to modification proposals: As mentioned in response to the related main issue above, there is evidence for need for self-build plots across the borough with many entrants on the register not specifying a preferred location. Requiring evidence of unmet need in a specific location risks under-delivery of self-build plots.	

POLICY H7 HOUSING STANDARDS

4.137. Seven representations on behalf of seven people or organisations argued that policy H7 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	The policy is unduly onerous and exceeds the requirements of emerging national policy. Developments should not be expected to exceed national standards.
Who raised the issue	Inside Land Group; Tritax Park Rugby West Limited
No. raising the issue	2
Council response	We disagree. Criterion A (Nationally Described Space Standards) is addressed below. In respect of criteria B and C, the updated Housing Needs Evidence recommends the inclusion of requirements for all dwellings to meet M4(2) standard and 3.5% of dwellings to meet M4(3) standard. Consultation on policy PM13 in the 2025 consultation version of the NPPF highlights that accessibility standards (“for which local standards in relation to requirement M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings) of the Building Regulations should be set in line with policy HO5,”) may be set locally within local plans.

Issue	No evidence provided to support inclusion of criterion A, or impact on meeting demand (e.g. starter homes). A barrier to supply.
Who raised the issue	Persimmon Homes (Central)
No. raising the issue	1
Council response	We think it is important to set minimum space standards based on the evidence. This is set out in the Nationally Described Space Standards Report (H1).

Issue	Cost implications of policy re M4(2) and M4(3) housing may serve to reduce the number of dwellings and reduce viability
Who raised the issue	Churchill Living & McCarthy Stone; West Midlands Housing Association Planning Consortium; Miller Homes (Brownsover Road); Rosconn Group
No. raising the issue	4
Council response	The costs associated with delivering this policy requirement have been included in the Local Plan Viability Study (I1). Amongst the key findings of this study (see para 1.7), is that the policy has a modest impact on viability, which is not sufficient to stop schemes from coming forward.

Issue	Not supported by evidence and mainly replicates current building regulations
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Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	We disagree. As noted above, there is a clear evidence base in the updated Housing Needs Evidence for Rugby Borough (document SD3). The accessibility standards are not mandatory Building Regulation requirements, so we do not consider them duplication.

Issue	Meeting NDSS to 100% can create viability challenges including losses on 100% affordable sites
Who raised the issue	West Midlands Housing Association Planning Consortium
No. raising the issue	1
Council response	The Local Plan Viability Report (I1) includes costs associated with meeting this policy requirement, as above.

4.138. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Part B of the policy should only require 40% of new dwellings to meet the requirements for Category 2 of M4(2), in line with emerging national policy, with higher provision only "where technically and viably feasible".	Inside Land Group; Tritax Park Rugby West Limited
Policy should be more flexible so as to prevent inefficient use of sites or unnecessarily impacting viability.	Tritax Park Rugby West Limited; West Midlands Housing Association Planning Consortium; Miller Homes (Brownsover Road)
Where step-free access is not viable, neither of the optional requirements in Part M should be applied	Churchill Living & McCarthy Stone
The wording 'where viable and practicable' should be added to the end of part C 'On developments of 10 or more homes...'	Churchill Living & McCarthy Stone
85% of NDSS should be permitted for 100% affordable developments where costs require this	West Midlands Housing Association Planning Consortium
Amend wording to B to read "all new dwellings <i>should aim</i> to meet requirements"	Rosconn Group
Amend wording to C to require "up to" 3.5% of dwellings to meet requirements	Rosconn Group
Council response to modification proposals: Most proposed modifications for this policy suggest a loosening of its requirements. It is felt that introducing greater flexibility to this policy would limit its	

applicability and effectiveness and risks resulting in poorer development outcomes.

POLICY H8 HOUSES IN MULTIPLE OCCUPATION

4.139. One representation on behalf of one person or organisation argued that policy H8 is unsound. Two representations on behalf of 135 people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Unfeasible for plan to be implemented given the volume of low skilled/low wage employment being proposed
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council response	We disagree. The policy is not seeking to prevent the development of HMOs, rather trying to stem concentrations of HMOs which may be considered harmful. This policy approach has been adopted in neighbouring authority areas including Coventry City.

POLICY W1 WELLBEING

4.140. 12 representations on behalf of 12 people or organisations argued that policy W1 is unsound. 114 representations on behalf of 1,809 people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Impacts on nearby residents from noise and traffic relating to Coventry Stadium
Who raised the issue	Lawrence, Joanna; Kaur, Sonia; Singh, Ramandeep; Kaur, Pavan; Kan, Alan; Tsim Kan, Zoe
No. raising the issue	6
Council response	Any proposals to bring the stadium back into use as a sporting venue will be required to assess impacts on nearby residents and minimise highways impacts as part of the planning application. The stadium was in use until 2016 and there have been residential properties nearby during its operational life.

Issue	Local residents' views not being given adequate consideration
Who raised the issue	Lawrence, Joanna; Kaur, Sonia
No. raising the issue	2
Council response	Local residents have been able to give their views at both this round of consultation and the previous Local Plan consultations – the council has considered responses received on

	all occasions. There will be further opportunities for residents to comment when an application is submitted.
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Issue	Continued promotion of speedway activities is harmful to health of local residents
Who raised the issue	Kaur, Sonia; Singh, Ramandeep; Kaur, Pavan; Kan, Alan; Tsim Kan, Zoe
No. raising the issue	5
Council response	Any proposal to bring the stadium back into use as a sporting venue will be required to demonstrate no harmful impacts on the health of local residents.

Issue	Environmental concerns - supporting reintroduction of motor sport conflicts with BNG & climate objectives
Who raised the issue	Kan, Alan; Tsim Kan, Zoe
No. raising the issue	2
Council response	Any development proposals on the site will be required to comply with biodiversity net gain and climate policies of the plan. Further environmental assessments may also be required at application stage. The council believes the benefits of supporting the site and retaining its local cultural and recreational value justify this policy.

Issue	Site should be used for open space and community recreational uses to be more compatible with surrounding area
Who raised the issue	Kaur, Sonia; Singh, Ramandeep; Kaur, Pavan; Kan, Alan; Tsim Kan, Zoe
No. raising the issue	5
Council response	Policy W1 B supports “the restoration of the site for speedway and stock car racing and other motor sports <i>together with other community uses</i> ” [emphasis added]. It is felt this wording will facilitate the delivery of other community recreational uses as part of the site’s redevelopment. The stadium was operational until 2016, being run alongside nearby residential properties.

Issue	Inclusion of sports facilities within this policy is inconsistent with national policy -NPPF para 104. Sports facilities should not be considered suitable for development on the basis of viability or lack of commercial interest.
Who raised the issue	Sports England
No. raising	1

the issue	
Council response	In combination policy W1 and policy W2(F) means that proposals for redevelopment of sports facilities would need to satisfy <i>both</i> the provisions of policy Q1 and the applicable provisions of national policy on the protection of sport and recreation buildings and land including playing pitches. The policy is accordingly not inconsistent with national policy and doesn't allow redevelopment of sports facilities on the basis of viability or lack of commercial interest alone

Issue	Stadium should be used to provide more inclusive and future facing sport than speedway
Who raised the issue	Timms, Heather
No. raising the issue	1
Council response	Policy W1 B supports “the restoration of the site for speedway and stock car racing and other motor sports <i>together with other community uses</i> ” [emphasis added]. It is felt this wording will facilitate the delivery of other community recreational uses as part of the site's redevelopment. The plan makes provision for other kinds of sports and recreation facilities as set out in policy W2.

Issue	Viability challenges of restoring the stadium for speedways uses not considered sufficiently after 10 years of dereliction - housing should be an option
Who raised the issue	Currington, Ian; Parsons, Chris
No. raising the issue	2
Council response	Housing development is not opposed in principle by this policy – it states that permission will not be granted where proposals would conflict with the objectives of restoring the stadium for speedway and stock car racing and other community uses. Mixed-use development of the site could overcome potential viability challenges.

Issue	Policy proposes community uses for which there are no existing planning permissions granted so it is providing additional protection which is not in compliance with the NPPF
Who raised the issue	Timms, Heather
No. raising the issue	1
Council response	The respondent does not specify which national policy this is non-compliant with. The council does not consider there to be a conflict.

Issue	Inconsistent with national policy. Refers to Coventry Stadium being treated in a different
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	way to other facilities but fails to set out why this is the case - the stadium has never acted as a community facility and an application to designate it as an asset of community value was rejected.
Who raised the issue	Brandon Estates Ltd
No. raising the issue	1
Council response	Community facilities are not limited to those with community ownership or designated assets of community value – it also includes privately owned businesses which provide a community service or have recreational value such as public houses and post offices. W1 B provides specific protection for Coventry Stadium on account of the site’s cultural significance to the area, strong public support for its redevelopment, and previous applications and appeals on the site. The high level of support for restoration of speedway use was shown by 1,530 responses supporting this being submitted at Regulation 18 preferred options stage and a further 1,809 responses supporting this at Regulation 19.

Issue	Part B establishes separate criteria for consideration of development potential at Coventry Stadium. The NPPF does not allow for a specific facility to be treated outside of criteria-based policies. To be positively prepared, W1 should include the possibility that the site could come forward in a number of ways.
Who raised the issue	Brandon Estates Ltd
No. raising the issue	1
Council response	The policy includes a reasonable degree of flexibility – it states that permission will not be granted where proposals would conflict with the objectives of restoring the stadium for speedway and stock car racing and other community uses, rather than explicitly preventing other uses from coming forward in principle. Mixed-use development of the site with different combinations of residential and leisure uses is therefore still possible. There is no provision of the NPPF which prohibits local authorities from setting locally specific policy in this way.

4.141. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Policy W1B [re: Brandon Stadium] should also allow for repurposing for housing to counter viability challenges.	Currington, Ian
"other community uses" is too vague - further clarity on future of the site [Brandon Stadium] should be provided.	Currington, Ian
Removal from the plan of all named sports stadia and the general terms applied	Timms,

	Heather
Removal of paragraph B as there are no planning permissions granted on the site for community purposes	Timms, Heather
Amend wording to explicitly note that healthcare facilities are not covered by this policy as a community facility. Suggested additional wording "Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use."	NHS Property Services
Other sports facilities listed alongside Coventry Stadium in paragraph 7.2 should be similarly protected	Carter, David
Amend to reflect para 104 of the NPPF and the potential for the Coventry Stadium to accommodate an element of housing	Brandon Estates Ltd
Part B should be deleted and Coventry Stadium treated equally in line with national policy	Brandon Estates Ltd
<p>Council response to modification proposals: For the reasons set out above, the council do not support the modifications proposed or consider them to be necessary to address issues of soundness.</p> <p>Excluding health facilities, as proposed by NHS Property Services, would conflict with NPPF para 20c) which states that community facilities can include health infrastructure.</p>	

POLICY W2 OPEN SPACE AND SPORTS PROVISION

4.142. Five representations on behalf of five people or organisations argued that policy W2 is unsound. One representation on behalf of one organisation or individual argued the policy is sound. The main issues for this policy are listed below.

Issue	Insufficient green space within the town centre. Suggestion of CPO to create new open space on land adjacent to Chapel Street.
Who raised the issue	Batchelor, Colin
No. raising the issue	1
Council response	The town centre boundary lays within the wards of Benn, Eastlands and New Bilton. Per the existing provision table on pages 88-89 of the submitted Local Plan, it is recognised that both Benn and New Bilton have deficits across all open space typologies when measured against the open space standards specified by policy W2, and that Eastlands has deficits across three of the typologies. Therefore, any residential developments of 10 or more dwellings within these wards will be expected to deliver open space in line with the standards, either through on-site provision or off-site contributions. The acknowledged deficiencies in open space within the town centre (or elsewhere in the Borough) are not deemed to make policy W2 unsound, and the compulsory purchase of land is not considered to be a matter of direct relevance to the assessment of this policy at examination.

Issue	W2(f) cross refers to policy W1. Not clear how proposals on open space, sports and recreation areas will be assessed, and considered inconsistent with NPPF para 104.
Who raised the issue	Sports England; Urban & Civic
No. raising the issue	2
Council response	<p>There is no inconsistency.</p> <p>In combination policy W1 and policy W2(F) means that proposals for redevelopment of sports facilities would need to satisfy <i>both</i> the provisions of policy Q1 and the applicable provisions of national policy on the protection of sport and recreation buildings and land including playing pitches.</p> <p>The policy is accordingly not inconsistent with national policy paragraph 104, indeed it directly applies it.</p>

Issue	Playing pitch requirements are based on team numbers. Team numbers should be regularly reviewed - ideally annually (relevant to appendix 3), and ancillary requirements should also be considered.
Who raised the issue	Sports England
No. raising the issue	1
Council response	It is not feasible to update the open space standards on a rolling basis. It needs to be clear from the plan what the expectation is. These standards can only be updated through plan-making.

Issue	Unclear whether standards used for new provision or financial contributions in W2B. W2E should be expanded so that strategy informs on or off site provision.
Who raised the issue	Sports England
No. raising the issue	1
Council response	The standards will be used, in combination with the Playing Pitch & Outdoor Sports Strategy as specified in W2.E, to determine when on-site provision or off-site contributions are necessary, with clear preference given to the former. New residential developments can only be expected to address the impacts that they are causing, not pre-existing issues, such as whether an existing pitch is overplayed. However, as the policy specifies that the need for contributions to sport pitch provision will be assessed based on the Playing Pitch & Outdoor Sport Strategy, this will allow, where appropriate, improvements to the quality of existing

	pitches to be secured through developer contributions.
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Issue	Plan does not address shortfalls in quality indoor sports provision in Rugby - only outdoor sports provision is explicitly mentioned. Population growth will create even further demand.
Who raised the issue	Rugby and District Badminton Association
No. raising the issue	1
Council response	<p>The policy does not cover indoor sport provision. The policy is first and foremost about land use planning i.e. reserving land for the provision of open space and outdoor sports. It does not cover public buildings for indoor sport. This is commonly the position in similar local plan policies.</p> <p>Policies W1 and W2 do, however, protect existing indoor sports facilities.</p> <p>The cost and complexity of delivering new public indoor sports facilities mean that it is seldom realistic to deliver such facilities through housing development and the scale of new housing developments proposed through the plan could not deliver such facilities. Contributions to such borough-wide facilities would likely fall outside of the reasonable scope of site-specific s106 contributions.</p> <p>The provision of indoor sports facilities is more a matter for infrastructure planning. This infrastructure is not needed to mitigate individual developments planned through this plan, and so is not essential infrastructure to deliver the plan. However, the council has commissioned an indoor sports facilities study which is underway but not yet completed. Although important to planning for future indoor sports facilities in the borough, this study is not essential evidence to justify a policy of the proposed submission plan.</p> <p>Once the indoor sports facilities study is completed, any infrastructure requirements it identifies can be added to the infrastructure deliver schedule (which is a live document) and/or to the council's CIL annual infrastructure funding statements.</p>

Issue	Identified existing open spaces at Houlton in the policies map do not align with what has been constructed.
Who raised the issue	Urban & Civic
No. raising the issue	1
Council response	Some of the areas identified as open space by the consultee did not meet the definition of open space as adopted by the Council and therefore have not been identified as such on the policies map. For example, the area to the north of Houlton Way which contains a series of ponds was not publicly accessible at the time that the open space study was conducted, with signs erected on fences stating "No pedestrian access".

Issue	At present, policies W1 and W2 read as interchangeable, which is inconsistent with national guidance. W2 is the correct place against which NPPF para 104 should be applied.
Who raised the issue	Brandon Estates Ltd
No. raising the issue	1
Council response	It is not agreed that policies W1 and W2 read as interchangeable. W2 sets out the open space standards that new residential developments of 10 or more dwellings shall meet, whereas W1 protects against the loss of existing community facilities, including indoor and outdoor sports facilities as specified in paragraph 7.1. The Council deem that there is a distinct need for both policies and that they are consistent with the NPPF.

Issue	Plan fails to address the deficit in existing open spaces and the impact on existing spaces new developments will have.
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council response	Deficiencies in the quantitative provision of open space when measured against the standards set out by policy W2 are acknowledged in Appendix 3 of the submitted local plan. Qualitative deficits are identified in the Open Space Quality Audit Report (WB4). Addressing these deficiencies will require actions that are beyond the scope of a land-use plan, such as maintenance works or proposals for upgrading or enhancing facilities. However, the local plan does seek to ensure that sufficient open space shall be provided for planned growth by requiring new residential developments of 10 or more dwellings to provide open space on-site or make contributions to off-site provision, as set out in policy W2.

4.143. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend policies map showing open spaces in Houlton to reflect actual constructed facilities and use real place names	Urban & Civic
Amend part A to read "should aim"	Rosconn Group
New facilities in new developments must allow equal access and priority to existing residents in neighbouring areas. This must include a responsibility for those sites to remove existing deficits. Where there is a surplus, they could also benefit from not having to make further provisions and therefore increasing the surplus. Alternatively,	O'Connell, Mark

new developments must support their neighbours by funding projects to remove such deficits.	
Spaces, such as Great Central Way, must be protected during development and once the development is complete. Urbanisation of green spaces must not be permitted and natural barriers to any buildings must be created.	O'Connell, Mark
Provide explicit clarity that the pitch standards will be reviewed regularly in line with updated team and membership numbers, to ensure that demand assessments remain accurate and up to date.	Sport England
Confirm that Policy W2B is not applicable to the playing pitch standards, reflecting the fact that the PPS is not structured around ward boundaries and therefore should not be applied as a criterion for playing pitch typologies.	Sport England
Expand the wording of Policy W2E to state that decisions regarding on-site provision or off-site financial contributions will be informed by the Playing Pitch & Outdoor Sport Strategy.	Sport England
Amend the policy and Appendix 3 to include clear requirements for ancillary sports provision—such as car parking and changing accommodation—to ensure that playing field sites are fully supported and functional.	Sport England
<p>Council response to modification proposals:</p> <p>The response to the council to most of these proposed modifications is set out in responses to individual issues above.</p> <p>In relation to the second Sport England proposed modification, it is not necessary to modify the policy to say this, because W2B it is already inapplicable to sports pitches as ward level data has not been collected for these and is not presented in Appendix 3.</p> <p>The third Sport England proposed modification is not considered necessary to address an issue of soundness.</p> <p>The fourth Sport England proposal is a detailed design point about the delivery of new sports facilities. This can be considered if/when new facilities come forward. Given the cumulative scale of s106 contributions already being sought through the plan, the council does not consider that contributions to off-site sport provision can viably be increased further.</p>	

POLICY D1 WELL-DESIGNED PLACES

- 4.144. 70 representations on behalf of 74 people or organisations argued that policy D1 is unsound. three representations on behalf of three people or organisations argued that the policy is sound.
- 4.145. Most of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy D1 itself and so this hasn't been identified as a main issue.
- 4.146. The following main issues were raised with policy D1:

Issue	Repeats national policy
Who raised	William Davis Homes (site 315)

the issue	
No. raising the issue	1
Council response	The purpose of this policy is to set out high-level design principles for all development across the borough. It is appropriate that this covers the same themes as national policy, however we do not agree that it repeats national policy.

Issue	D1 is unsound because it makes reference to local design codes, one of which is the South West Rugby Design Code, which is considered to be overly prescriptive.
Who raised the issue	Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	1
Council response	The policy itself does not make reference to design codes, but the supporting text (para 8.1) sets out that the policy will be supported by design codes. This is in line with national guidance. The South West Rugby Design Code Supplementary Planning Document (SPD) was adopted by the Council in July 2025 and is a material consideration in determining planning applications on the South West Rugby allocation. We disagree that reference to design codes makes this policy unsound.

4.147. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Delete the reference to local design codes.	Tritax Big Box
Council response to modification proposals: Response is set out above.	

POLICY D2 INFILL AND HOUSEHOLDER DEVELOPMENT

4.148. 67 representations on behalf of 71 people or organisations argued the policy was unsound and one stated it was sound.

4.149. All of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy D2 itself.

4.150. No main issues were raised with policy D2.

POLICY D3 LANDSCAPING

4.151. 70 representations on behalf of 74 people or organisations argued that policy D3 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound.

4.152. Most of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy D3 itself and so this hasn't been identified as a main issue.

4.153. The following main issues were raised with policy D3:

Issue	D3 is too restrictive and makes insufficient allowance for operationally essential infrastructure.
Who raised the issue	Everwell Development and Mactaggart Family & Partners
No. raising the issue	1
Council response	We disagree that this policy is restrictive. It seeks to ensure development proposals are 'landscape led'.

Issue	Repeats national policy
Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	There is a clear relationship with the nature characteristic in the National Design Guide as acknowledged within para 8.5 of the supporting text. However, we do not agree that this policy repeats national policy.

4.154. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Criteria A, C, D, E, F, G, and H should be caveated with "where possible" or "where applicable", and criterion I should confirm that it will not be applied to the detriment of the function and requirements of use.	Everwell Development and Mactaggart Family & Partners
Review wording to clarify overall purpose of the requirements and ensure consistency with EN2.	Miller Homes (Brownsover Road)
Reword part E to separate out hard and soft landscaping requirements.	Miller Homes (Brownsover Road)
Council response to modification proposals: The council does not agree that it is necessary to add "where possible" and "where applicable" to every policy requirement. According to this logic every policy of the plan would need to be caveated in	

that way. This is not necessary because it obvious that policies aren't applied where they are inapplicable of compliance is impossible.

There is no inconsistency with Policy EN2 which is a thematically distinct policy.

The suggested amendment to para E is not considered necessary to address an issue of soundness. It is clear that "robust materials" applies to hard landscaping and "native planting" applies to soft landscaping without expressly setting this out.

POLICY D4 HISTORIC ENVIRONMENT

4.155. 70 representations on behalf of 75 people or organisations argued that policy D4 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound.

4.156. Most of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy D4 itself and so this hasn't been identified as a main issue.

4.157. The following main issues were raised with policy D4.

Issue	Repeats national policy.
Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	The policy states that it gives effect to national policy and legislation on the historic environment (para 8.9). It seeks to ensure the proper assessment and understanding of the significance of a heritage asset and the contribution of its setting. It does not repeat national policy in any significant way.

Issue	Does not fully capture the issue of incremental erosion of the setting of heritage assets.
Who raised the issue	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
No. raising the issue	2
Council response	Policy D4 is intended to be applied in the determination of planning applications which may impact a heritage asset and its setting. This has to be considered on a case-by-case basis.

4.158. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Replace para C with "Applications with the potential to affect the significance of a heritage asset, including the contribution made by its setting, must provide sufficient information and assessment (such as desk-based appraisals, field evaluation, and heritage impact assessments) to allow the nature, extent, and significance of any potential heritage assets and their setting to be understood and to enable a sufficient level of understanding of the proposal's likely impacts."	Warwickshire County Council
Add new para D: "There will be a presumption in favour of the preservation of locally and regionally important archaeological sites. Development that would result in harm to archaeological remains will only be supported where the applicant can demonstrate that the public benefits of the proposal clearly outweigh that harm. Where planning permission is granted for development that will have an adverse effect on archaeological remains, the Council will require the applicant to secure a programme of recording and analysis of that asset and archaeological excavation where relevant and ensure the publication of that record to an appropriate standard."	Warwickshire County Council
Amend para C to require consideration for the cumulative impacts of existing and proposed development when assessing impact.	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
The approach to support 'development that sustains and enhances the significance of heritage assets and their settings' should be considered on an overall basis having regard to the aims of other policies and the need to facilitate new development	Miller Homes (Brownsover Road)
<p>Council response to modification proposals:</p> <p>We are unclear what the first proposed amendment from Warwickshire County Council adds. This seems like a longer-form way of saying the same thing. The council has striven for clarity and conciseness in the expression of policies. It is not clear what issue of soundness this change would be seeking to address.</p> <p>The council disagrees with proposed new paragraph D from Warwickshire County Council. National policy and legislation provides a clear and comprehensive framework for the assessment of the impact of proposals on heritage assets including archaeology. Introducing separate local tests for just archaeological remains risks creating incoherence, making it difficult for decision makers to know how to respond to a proposal, and introducing conflict with national policy (particularly as national development management policies are introduced). It is not clear what issue of soundness this modification is seeking to address.</p>	

POLICY D5 SUSTAINABLE DRAINAGE

- 4.159. 73 representations on behalf of 77 people or organisations argued that policy D5 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound.
- 4.160. Most of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness

issues with Policy D5 itself and so this hasn't been identified as a main issue.

4.161. The following main issues were raised with policy D5.

Issue	Policy does not appear to address the current flood areas within villages & how water drainage in an existing flood area could be effectively managed without polluting existing waterways & worsening any flood risk
Who raised the issue	Wykes, Michael; Wykes, Janet
No. raising the issue	2
Council response	This policy is designed to manage surface water through use of sustainable drainage. Part D discusses a scenario where infiltration sustainable urban drainage systems (SuDs) (preferred) are not possible and surface water is discharged into a watercourse with the agreement of the Lead Flood Authority. Policy EN7 addresses flood risk, and a sequential approach has been taken in the site selection process for proposed allocations.

Issue	Policy does not take into account the pressure that would be placed on an already struggling wastewater system
Who raised the issue	Wykes, Michael; Wykes, Janet
No. raising the issue	2
Council response	This policy is designed to manage surface water through use of sustainable drainage. The policy states a preference for infiltration SuDs – i.e. where surface water soaks into the ground. Wastewater management is not relevant to this policy.

4.162. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend to add flexibility in part B to take into account specific site circumstances	Miller Homes (Brownsover Road)
Amend part B to read "SuDS should aim to"	Rosconn Group
Amend part E to read "SuDS should aim to have a maintenance..."	Rosconn Group
Council response to modification proposals: The council does not consider that the proposals for weakening of the policy wording are necessary to address an issue of soundness and these are not supported.	

POLICY I1 TRANSPORT

4.163. 66 representations on behalf of 71 people or organisations argued that policy I1 is unsound. Four representation on behalf of four people or organisations argued that the policy is sound. The main issues for this policy are listed below. Two representations were recorded as supporting the policy.

4.164. A significant proportion of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy I1 itself and so this hasn't been identified as a main issue.

4.165. The following main issues were identified:

Issue	Horse riding should be included in I1 B.vi to avoid dead end routes, and should be consistently included in the definition of active travel routes to avoid riders being designed out
Who raised the issue	British Horse Society
No. raising the issue	1
Council response	Supporting text 9.1 makes reference to horse riding as a part of active travel. The policy text refers to the most common means of accessing local facilities (walking, wheeling and cycling), whereas horse riding is considered primarily a recreational means of travel. Where a bridleway crosses an allocation site this must be retained in the development layout to ensure continued use of existing routes by horse riders.

Issue	RBC has no influence on the bodies responsible for public transport and therefore cannot ensure this is delivered
Who raised the issue	Pailton Parish Council
No. raising the issue	1
Council response	Bus services are overseen by Warwickshire County Council with improvements set out in the Bus Service Improvement Plan (BSIP) (see https://api.warwickshire.gov.uk/documents/WCCC-222510381-336). The Council has worked closely with Warwickshire County Council in the development of the local plan. Developers may be required to contribute to the delivery of BSIP schemes, as set out in the Infrastructure Delivery Schedule (I2).

Issue	Policy should be expanded to refer to ultra-low and zero emission vehicles and car sharing as sustainable transport modes per NPPF
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising	4

the issue	
Council response	The policy is designed to promote active travel and public transport use, and reduce vehicular traffic. Although ultra-low and zero emissions vehicles, and care sharing are more sustainable than conventional motorcar travel, they do not deliver all the benefits of active travel and public transport use which the policy seeks to deliver.

Issue	Local Cycling and Walking Infrastructure Plan is not sufficiently robust and requires a review to help improve connectivity between different localities in Rugby and secure funding for resurfacing schemes on GCW and the canal paths to open up access routes
Who raised the issue	Dixon, Chris
No. raising the issue	1
Council response	The Local Cycling and Walking Infrastructure Plan (LCWIP) was produced and adopted by Warwickshire County Council in 2024. The local plan is seeking to support proposals and schemes identified in the LCWIP, as referenced in the development annex, and in the Infrastructure Delivery Schedule (I2). Any update to the LCWIP would be a matter for Warwickshire County Council.

Issue	Insufficient infrastructure is proposed to accommodate the scale of growth around Rugby town. Road congestion is already a significant issue.
Who raised the issue	Callan, Neil
No. raising the issue	1
Council response	<p>This comment relates more closely to proposed allocations around Rugby in policies S6 and S7. Specific comments on individual sites in relation to transport and infrastructure have been responded to under S6 and S7 in this document.</p> <p>The plan has been developed in consultation with infrastructure providers including Warwickshire County Council, the local highway authority. The Strategic Transport Assessment (I3) modelled the potential impacts of the development proposals and identified highways improvements schemes to mitigate any adverse impacts. These are set out in the Infrastructure Delivery Schedule (I2) and developers of some schemes will be required to contribute to their funding.</p> <p>The plan cannot address existing infrastructure issues such as existing congestion.</p>

4.166. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
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Provision for active travel should include upgrades to wider routes through the rest of Rugby not just new sites such as SW Rugby to create complete connections	Robson, John
Part A should refer the Warwickshire Bus Service Improvement Plan (BSIP) and Warwickshire Rail Strategy (or their successors)	Warwickshire County Council
Refer to the provision of home to school transport and the prioritisation of safe walking routes where this could reduce the need for home to school transport	Warwickshire County Council
Amend policy to allow for flexibility to respond to site specific circumstances	Miller Homes (Brownsover Road)
Amend part B to read "development should aim"	Rosconn Group
Add the following to I1 Bi. "...and opportunities for sustainable transport modes, including walking and cycling, ultra-low and zero emissions vehicles, car sharing and public transport, can be maximised"	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
<p>Council response to modification proposals:</p> <p>The first comment relates to the need for upgrades to existing active travel infrastructure unrelated to new development. This is a matter for the transport plans of Warwickshire County Council. This policy is only applicable to planning applications for new development.</p> <p>In relation to the first WCC proposal, this amendment is not considered necessary to address an issue of soundness. The need for contributions to BSIP measures is identified in the Strategic Transport Assessment and the need for public transport contributions is referenced in a number of the site allocation development principles. It is not clear that development could/should contribute to the delivery of the Rail Strategy. Notwithstanding the council's view that this is not necessary to address an issue of soundness, it would not object to this modification being made if the inspector(s) conclude otherwise. The council's response to the proposal of the county council in relation to home to school transport is the same: this is not needed to address an issue of soundness, but the council would not oppose this amendment.</p> <p>The amendments seeking to weaken the policy are not supported.</p> <p>The council's response to proposal of GLP Europe et al. is set out above.</p>	

POLICY I2 PARKING

4.167. Two representations on behalf of two people or organisations argued that policy I2 is unsound. One representation on behalf of one person or organisation argued that the policy is sound. The following main issues were raised with policy I2:

Issue	Para 9.4 - reducing parking provision doesn't reduce car ownership and contributes to on-street parking pressures
Who raised the issue	Warwickshire County Council
No. raising the issue	1

Council response	Supporting text 9.4 does not restrict parking provision – it is designed to acknowledge the need for balance and that overprovision of parking can reduce modal shift potential and can be an inefficient use of land.
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Issue	para 9.6 - Further clarification is required on where car clubs have been successfully secured and operated. WCC are not aware of any examples in Warwickshire. Evidence of where they have been implemented elsewhere, how successful they have been, and how they are managed in perpetuity would assist in understanding their applicability
Who raised the issue	Warwickshire County Council
No. raising the issue	1
Council response	Supporting text 9.6 does not actively promote the use of car clubs nor draw on evidence of their successful implementation. It instead seeks to provide flexibility within parking standards where site-specific circumstances may justify more or less parking provision than is set out in the standards.

Issue	Requirements for cycle parking in elderly persons/extra care accommodation are unnecessary as the types of people who live there are unlikely to cycle
Who raised the issue	Churchill Living & McCarthy Stone
No. raising the issue	1
Council response	Cycle parking provision is still felt to be justified for these developments to promote sustainable and active travel for staff and/or visitors.

4.168. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
App 2 use "cycle spaces" rather than "cycle stands"	Warwickshire County Council
Standards for cycle parking should reflect LTN 1/20 there are currently some discrepancies	Warwickshire County Council
Appendix B should state that cycle parking for adapted cycles for disabled people should be provided for all land uses and should equate to 5% of total cycle parking capacity both long and short stay and should be co-located with disabled car parking	Warwickshire County Council
The basis for determining the boundary of the High Access Zone is unclear, however	Warwickshire

it is noted that some trips within the zone, particularly to the railway station, significantly exceed the typical 1-mile / 20-minute walking threshold which is commonly used to define reasonable walking access, and do not offer direct bus services. It may therefore be more appropriate to consider parking requirements within the zone on a case-by-case basis rather than accepting lower provision as standard	County Council
Refer to "mobility / visual impairments" instead of "disabled" or "persons with disabilities"	Warwickshire County Council
Additional text needed on access to cycle parking: Is the facility accessed from a 20mph street? Is it served directly by a dedicated cycle route? Is it positioned on the appropriate side of the carriageway for safety and legibility?	Warwickshire County Council
Detailed comments and modifications suggested see page 122 onwards of WCC response	Warwickshire County Council
Delete the requirement for provision of residents' cycle parking for elderly persons' dwellings so that each case can be considered on its own merits. Parking requirements should also be considered based on the data of the main providers and each case judged on its own merits.	Churchill Living & McCarthy Stone
Parking spaces for HMOs should be the same in both high and low access areas - one space per bedroom	Save Rounds Gardens (New Bilton Community Association)
Garages should not be taken into account in the parking allocation. Where possible garages should be discouraged and smaller storage facilities encouraged, giving more space for parking.	O'Connell, Mark
Underground parking should be considered.	O'Connell, Mark
The allocation for any property, irrespective of bedrooms, should have a provision for 2 cars to be parked.	O'Connell, Mark
<p>Council response to modification proposals: Suggested amendments to references to cycle spaces and visual/physical impairments do not affect matters of soundness. 'Cycle spaces' are referred to already throughout appendix 2, and the only reference to stand (which could be corrected for consistency) is on page 77. The council will propose this correction as an additional modification.</p> <p>Standards for provision of adapted cycle parking have not been included, and have not been suggested through previous public consultations.</p> <p>Cycle parking standards were amended following the Preferred Options consultation (Regulation 18) to more closely align with LTN/120 based on feedback received at that stage. However, LTN/120 (p134) does not identify standards for all of the uses defined in appendix 2.</p> <p>Access to cycle parking is beyond the scope of what the standards are seeking to achieve – i.e. provision of an appropriate amount of parking. Existing national and Local Highway Authority guidance can inform access.</p>	

Detailed suggestions in the Warwickshire Country Council representation are largely addressed in this Council response, though it may not address every point specifically.

The high access zone is a modified version of the high access zone in the adopted local plan, and focusses on access to Rugby town centre primarily. This updated version of the high access zone has been designed to ensure it reflects walking/cycling routes from the defined town centre, and seeks to redraw the area rationally, avoiding for example streets being half in the zone and half out. Vehicle parking standards are intended for flexible application where evidence supports this, as set out on page 75.

Cycle parking provision for dwellings for elderly persons aligns with LTN/120, and was amended to the current proposal following feedback at Regulation 18 (Preferred Options).

Vehicle parking provision for HMOs seeks to respond to a high access context in a similar way to other residential uses. These can be applied flexibly as set out on page 75.

As set out in the 'notes' column for residential parking standards (79), garages may only be included in parking space provision where minimum internal dimensions are provided. This is designed to ensure that the garage could appropriately accommodate a parked car and other storage, and aligns with the Warwickshire Design Guide produced by the Local Highway Authority.

The parking standards do not prohibit underground parking, though this is not a common form of parking provision within the borough.

Parking standards for vehicles may be applied flexibly based on the evidence. It is not considered necessary to provide a minimum of two parking spaces per dwelling.

POLICY I3 COMMUNICATIONS INFRASTRUCTURE

4.169. No representations were received on this policy.

POLICY I4 INFRASTRUCTURE AND PLANNING OBLIGATIONS

4.170. 89 representations on behalf of 92 people argued that policy I4 is unsound, however most of these relate to the inconsistency of residential allocations with the policy rather than the policy itself. Three representations on behalf of three people or organisations argued that the policy is sound.

4.171. A significant proportion of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy I4 itself and so this hasn't been identified as a main issue.

4.172. The following main issues were raised with policy I4:

Issue	Plan should mention need for a new household recycling centre and waste transfer station
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Who raised the issue	Warwickshire County Council
No. raising the issue	1
Council response	This is outside of the scope of the local plan as a county matter, and a matter for waste planning. However, the council has indicated in its statement of common ground with Warwickshire County Council (document SOCG7). This is included in the proposed minor modifications (document CD20).

Issue	Criterion B is unsound in seeking retrospective contributions and has the potential to delay the pace of decisions
Who raised the issue	Persimmon Homes (Central)
No. raising the issue	1
Council response	The experience of the council is that this policy would address a genuine issue of latecomer sites piggybacking on infrastructure already delivered without contributing. This is principally a risk that arises in relation to speculative development that isn't in the plan. It is expected that this would apply to relatively few developments and would not delay decisions.

Issue	Policy is too rigid and does not allow for different site contexts
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	The principle that sites should mitigate their impacts to avoid unacceptable impacts is not "too rigid" but a basic principle that should apply irrespective of site context.

4.173. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Policy should state that responsibility for employment and skills plan is responsibility of future occupier of the building rather than the developer	Barberry Ansty Limited
The IFS should reference electricity infrastructure requirements, and specify that LPA should maintain regular contact with NGED to ensure an up-to-date schedule of requirements is maintained.	National Grid Electricity Distribution

Add wording to ensure planning obligations sought meet the tests in NPPF (2024) para 58	Miller Homes (Brownsover Road)
<p>Council response to modification proposals:</p> <p>Who signs the employment and skills plan would be a matter for determination on an application by application basis. It is not necessary to modify the plan to set this out.</p> <p>The comment of NGED is considered to be more about the implementation of the plan than a comment on the soundness of this policy. However, the council agrees it is important to maintain regular dialogue and share up to date information on requirements.</p> <p>It is not necessary to repeat the rest for planning obligations set out in national policy, indeed doing so would be contrary to the NPPF text on duplicating national policy.</p>	

POLICY I5 NEW RAILWAY STATIONS

4.174. Three representations on behalf of 300 people or organisations argued that policy I5 is unsound. Three representations on behalf of three people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Safeguarding land for potential mainline connection is not justified and not shown to be deliverable
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	The Rugby Parkway Station - Safeguarding Land for Future Expansion report (I12) puts forward the case for safeguarding land for this purpose. The expansion of the railway station would enhance the public transport offering at Houlton SUE and eastern Rugby, in line with national policy (NPPF section 9 Promoting sustainable transport).

Issue	Expansion of the station would lead to exacerbation of local traffic issues which have not been sufficiently evidenced or mitigated
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	This policy seeks to safeguard land for the potential expansion of the proposed Rugby Parkway railway station rather than setting out a concrete development scheme. Any development proposal will be subject to further highways assessments and mitigation schemes may be required.

Issue	Contravenes protection for the Rainsbrook Valley in policy EN3
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Who raised the issue	Hillmorton Voice Residents Association; Warwickshire Wildlife Trust
No. raising the issue	299
Council response	It is true that the safeguarded land lies within the area designated as the Rainsbrook Valley landscape of elevated sensitivity in policy EN3. Policy I5 seeks to safeguard land for the potential expansion of the proposed Rugby Parkway railway station rather than setting out a concrete development scheme. Any development proposal will be subject to further landscape assessments and mitigation measures to minimise harms to the Rainsbrook Valley landscape of elevated sensitivity may be required.

Issue	The Nuneaton Parkway safeguarded land should be deleted - no case for it.
Who raised the issue	CPRE
No. raising the issue	1
Council response	The Nuneaton Parkway Safeguarding document (I13) sets out the case for a new railway station at this location. The station would provide sustainable transport options for rural settlements to the north of Borough and reduce vehicular traffic into Nuneaton and Hinckley. This policy seeks to safeguard land for the potential development of Nuneaton Parkway station; it is not a concrete development scheme. Further business case evaluation is still ongoing.

Issue	Settlement hierarchy does not appear to reflect this policy and neglects opportunities at Rugby, notably Hillmorton
Who raised the issue	Persimmon Homes (Central)
No. raising the issue	1
Council response	It is assumed this comment relates primarily to land safeguarded for potential expansion of Rugby Parkway station. The safeguarded land is close to Houlton SUE which will deliver c.6000 homes and offers significant ridership opportunities for the new station. It will also provide connectivity to areas such as Hillmorton and rural settlements in West Northamptonshire. The settlement hierarchy still prioritises development within the Rugby urban area, where it is appropriate to do so. The site selection process considered a range of factors, and proximity to the potential expansion area of the railway station would not necessarily override other concerns e.g. landscape sensitivity of the Rainsbrook Valley at Hillmorton.

Issue	Request that potential wider benefits of the Rugby Parkway Station are recognised beyond
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	Rugby Borough and that efforts are made to improve connectivity with villages in West Northamptonshire.
Who raised the issue	West Northamptonshire Council
No. raising the issue	1
Council response	Noted. The Council welcomes the opportunity to work with West Northamptonshire Council in ensuring the station delivers benefits across the wider area.

4.175. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend para 9.17 to reflect the fact that Rugby Parkway station has been granted outline planning permission.	Stoford Properties Ltd
Council response to modification proposals: This is a proposed factual amendment to supporting text. It isn't necessary to address an issue of soundness but could be made as an additional modification.	

OTHER ISSUES: DUTY TO COOPERATE

4.176. The following main duty to cooperate issues were raised in addition to those noted under specific policies above.

Issue	No reference to potential for Coventry to meet housing requirements given RBC had previously accommodated some of Coventry's unmet need
Who raised the issue	Bostock, Tom
No. raising the issue	1
Council response	Coventry City is a tightly bounded urban authority. It is not a realistic option for it to accommodate unmet need from Rugby Borough.

Issue	No response from Harborough Council or engagement as to whether Coton Park East allocation could be accommodated at Magna Park
Who raised the issue	Currington, Ian
No. raising the issue	1

Council response	Exporting employment need to Harborough District is not considered to be a realistic option. Harborough District lies within a different functional economic market area and housing market area.
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Issue	Insufficient evidence of ongoing constructive engagement with neighbouring authorities and relevant bodies
Who raised the issue	Pitty, Kathleena; Pitty, Richard; Jennings, Ross; Longworth, Tom
No. raising the issue	4
Council response	The Duty to Cooperate Statement (document CD14) details the engagement undertaken. Subsequent to the consultation closing, statements of common ground have been prepared (documents SOCG1-17).

Issue	There has been no collaborative work to determine whether Green Belt release on the Coventry/Rugby boundary constitutes an appropriate strategy for meeting strategic employment needs contra NPPF para 24
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	<p>The statement of common ground with Coventry City Council (SOCG2) states in relation to the sites close to the Coventry urban edge (Ansty Park North and Walsgrave Hill):</p> <p>“It is further agreed that these sites are potentially appropriate locations to accommodate opportunity Area 7 strategic need and local employment need given their proximity to existing employment clusters, their existing and potential transport links, and their proximity to labour supply in Coventry.</p> <p>It is agreed that these benefits contribute to sustainably located employment provision as part of a balanced spatial strategy which addresses both local and sub regional need.”.</p> <p>Stoford’s comment appears to imply that there should be a joint local plan between Coventry and Rugby and/or a joint Green Belt study. In relation to the former suggestion, the preparation of joint plans is not a requirement of the NPPF. In relation to the latter point, the West Midlands Green Belt boundary and the administrative boundary between Rugby Borough and Coventry are the same except for a small area of Green Belt within Coventry City north of the M6 and lying between Alderman’s Green Lane and Shilton Lane south east of Alderman’s Green village which is very unlikely to be a realistic development location. Therefore, a Green Belt review in this area is effectively only considering Green Belt within Rugby Borough and it is appropriate that it was commissioned by Rugby Borough Council. Coventry City Council were consulted on the methodology for the Green Belt review.</p>

Issue	RBC has not engaged with South Warwickshire University NHS Foundation Trust / University Hospital Coventry and Warwickshire NHS Trust regarding absorbing increased demand for healthcare
Who raised the issue	South Warwickshire University NHS Foundation Trust; University Hospital Coventry and Warwickshire NHS Trust
No. raising the issue	2
Council response	<p>Neither of the above organisations was a prescribed body listed in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012 for the purposes of the duty to cooperate under s33A Planning and Compulsory Purchase Act 2004, prior to the repeal of this provision.</p> <p>The relevant prescribed body listed is each integrated care board (ICB) established under Chapter A3 of the National Health Service Act 2006 and NHS England. The ICB for Rugby Borough is Coventry and Warwickshire ICB. A statement of common ground with Coventry and Warwickshire ICB is document SOCG14.</p> <p>Notwithstanding that neither organisation is a prescribed body, they are relevant bodies for the purposes of the NPPF.</p> <p>NPPF paragraph 25 refers to engaging with “relevant bodies” which includes “infrastructure providers” which paragraph 26 states “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary”.</p> <p>Paragraph 27 states that “strategic policy making authorities should make sure that their plan policies align as fully as possible with those of other bodies where a strategic relationship exists on these matters, and take into account the relevant investment plans of infrastructure providers, unless there is a clear justification to the contrary. In particular their plans should ensure that: a) a consistent approach is taken to planning the delivery of major infrastructure, such (...) strategic health, education and other social infrastructure (such as hospitals...)”.</p> <p>The requirements of these paragraphs are to as part of joint-working with relevant bodies “align as fully as possible”, “take into account the relevant investment plans of infrastructure provides” and ensure “a consistent approach is taken to the delivery of major infrastructure”.</p> <p>As detailed in the Duty to Cooperate Statement (CD14) the Development Strategy Manager of the council has engaged with University Hospital Coventry and Warwickshire NHS Trust (UHCW) and South Warwickshire University NHS Foundation Trust (SWFT) through regular meetings of the NHS Local Estates Forum (LEF) which UHCW generally chairs.</p> <p>The Development Strategy Manager attended meetings of the LEF on 23 July 2024, 30</p>

September 2024, 22 December 2024, 3 February 2025, 7 April 2025, 2 June 2025 and since the preparation of that statement further meetings on 6 October 2025, 1 December 2025, and 2 February 2026.

At those meetings from summer 2024 onwards the Development Strategy Manager presented the evidence base on future housing needs and population growth, presented the emerging preferred options, and more recently presented the proposed submission plan. By providing this information as plan-making was progressing the council sought to enable the NHS organisations to understand planned housing and population growth and factor that into their plans. Conversely, the meetings allow the council to understand the plans of the NHS organisations. The LEF meeting on 6 October 2025 was an in-person workshop hosted by and led by RBC on the emerging proposed submission plan.

At those meetings RBC highlighted the consultation periods and encouraged responses from the NHS organisations present.

UHCW is on the council's planning policy consultation database and was invited to respond to both Regulation 18 consultations. It did not respond at issues and options stage and responded at preferred options stage only to set out its support for the allocation of land at Walsgrave Hill, Rugby site (site 121) because of the ability of that site to deliver a blue light route to the hospital.

SWFT was not, prior to the Regulation 19 consultation, on the council's planning policy consultation database because it does not operate hospitals in the borough or which primarily serve the borough. However, it engages with the council through the Rugby LEF as detailed above.

Overall, RBC has clearly engaged with UHCW and SWFT and other NHS organisations operating in the borough to ensure that their respective planning aligns as fully as possible and to ensure that the council can, "take into account the relevant investment plans of infrastructure providers".

Turning to the substance of the two organisations' complaints:

- SWFT states in its response that there are an increasing number of Rugby Borough residents accessing Warwick Hospital and it seeks financial contributions to healthcare infrastructure to mitigate these impacts.
- UHCW submits a similar response arguing that financial contributions are needed to increase capacity at the trust's hospitals which serve Rugby Borough residents.

In response, the council would make the following points:

- The requirements of the NPPF do not include an assumption that local plans will fund increased capacity at secondary healthcare facilities through developer contributions as sought by SWFT and UHCW. Generally the position is that hospitals are not funded through the planning system.
- Given that UHCW and SWFT serve sub-regional catchments encompassing all of

	<p>Coventry and Warwickshire it is generally difficult to demonstrate that contributions sought through s106 – as is proposed by both SWFT and UHCW – are directly related to the development and fairly related in scale and kind for the purposes of Regulation 122 of the Community Infrastructure Levy Regulations 2010. This is particularly the case because Coventry and Warwickshire as a housing market area is circa 70% self-contained in terms of migration. Moves from one part of the areas the hospitals serve to another do not create a need for additional hospital infrastructure. It is also the case that s106 contributions would be difficult to justify because all new housing allocations proposed through the plan are relatively small-scale with the largest new allocation for 400 homes.</p> <ul style="list-style-type: none"> - Similarly, it may be difficult to demonstrate that such contributions are necessary given the availability of other funding sources to pay for hospitals. - Rugby Borough Council is a community infrastructure levy charging authority and this can in principle be used to fund strategic infrastructure including healthcare. However, decisions as to how CIL funds are spent are for the council or its successor unitary authority and there can be no guarantee that this would be spent on hospital provision. - As demonstrated in the viability study (I1) development viability is tight factoring in CIL, likely s106 obligations and other policies of the plan and there is not headroom to also fund hospital provision. <p>In summary, the Council has engaged with UHCW and SWFT on an ongoing basis to ensure alignment of plans as required by the NPPF, but the council does not support adding additional developer requirements to fund hospital provision through s106.</p>
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OTHER ISSUES: LEGAL COMPLIANCE/ SUSTAINABILITY APPRAISAL/ CONSULTATION/ EVIDENCE

4.177. The following main legal compliance issues and issues with evidence were raised in addition to those noted under specific policies above.

Issue	Sustainability appraisal inadequate as failed to correctly consider an alternative site
Who raised the issue	Prologis UK Limited; Persimmon Homes (Central); Miller Homes; Midlands Land Portfolio; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes; Mackenzie Miller Homes
No. raising the issue	9
Council response	Many omission site promoters raise points of disagreement in relation to the consideration of their sites in the sustainability appraisal report. The council was not the author of that report and so does not respond those comment line by line. Individual representations should be reviewed for details.

	<p>However, it is important to note that the authors of the SA report needed necessarily to make judgements based on imperfect information. The report is necessarily broad brush and geared to understanding the sustainability of proposals and identifying the potential for significant environmental effects.</p> <p>Others argue an omission site should have formed part of a reasonable alternative. The process by which the reasonable alternatives were identified is explained in detail in the SA report.</p> <p>It is inevitable that some omission site promoters will wish to dispute the Sustainability Appraisal, potentially in some cases on a line by line basis challenging every micro judgement made therein. It will be for the inspectors to determine whether examination time should be used for this. It is noted that para 5.15 of the Procedure Guide for Local Plan Examinations states “the merits of sites not allocated in the submitted plan (known as “omission sites”) will not normally be discussed at the hearing sessions. This is because the focus of the examination is on the soundness of the submitted plan”.</p>
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Issue	Sustainability Appraisal should appraise individual sites rather than grouping sites into sub-area scenarios/reasonable alternative growth scenarios
Who raised the issue	Miller Homes; Latimer Developments Ltd; Rosconn Group; Warwickshire Property and Development Group (site 90)
No. raising the issue	4
Council response	This point was considered in the Sustainability Appraisal report (CD5) which states at para 4.2.5: “Whilst individual site options clearly generate interest, they are not RAs in the context of most local plans. Were the objective to allocate one site, then site options would be RAs, but that is rarely the case for local plans. Rather, the objective is to allocate a package of sites and so RAs must be in the form of alternative packages of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining RA growth scenarios (Sections 5.3 & 5.4).”.

Issue	Sustainability Appraisal does not test the new plan period or quantum of development against other reasonable alternatives such as the preferred options scenario
Who raised the issue	Persimmon Homes (Central); Catesby Strategic Land; Stoford Properties Ltd
No. raising the issue	3
Council response	<p>Quantum of development is discussed in paragraphs 5.2.1-5.2.21 of the SA report. The housing growth scenarios in section 5.5 do incorporate different quanta of growth.</p> <p>The housing growth scenarios test options that could deliver 11,729-13,414 units. The latter is 24% above LHN. Therefore, different growth quanta are tested through the reasonable alternative scenarios. Trying to test different housing requirement figures in</p>

	<p>the abstract, divorced from the sites needed to deliver them would not allow useful commentary on the environmental and sustainability effect of different growth quanta.</p> <p>By contrast, for employment land the scale of development proposed in the different growth scenarios, except for scenario 4 which is lower, is comparable. However, this is in line with the judgement made in para 5.2.19 of the SA that there is limited strategic case for significantly lower of higher growth scenarios.</p> <p>Plan period is a decision for the plan-makers as it comprises part of the scope of the plan. SA is determined by the scope of the plan. It would therefore not be appropriate to test options through SA that are inconsistent with the scope of the plan, for example by adopting a different plan period.</p>
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Issue	<p>Sustainability Appraisal doesn't present any detail of the appraisal process followed; it simply provides a written commentary on the opportunities of each site/settlement, rather than based on a systematic appraisal of options against the SA objectives. Only four scenarios are referred to in the assessment (Long Lawford, South of Rugby, NW Rugby, and Lodge Farm) rather than all scenarios so not all scenarios assessed equally as required by Heard judgment <i>Heard v Broadland DC</i> [2012] EWHC 344 (Admin) (24 February 2012) (para 71)</p>
Who raised the issue	<p>Miller Homes; Latimer Developments Ltd</p>
No. raising the issue	<p>2</p>
Council response	<p>There are two separate points here:</p> <ul style="list-style-type: none"> (1) Appraisal process insufficiently systematic (2) Failure to assess all scenarios equally <p>Latimer Developments Ltd only make the first of those points, which they relate to the above issue about failure to appraise individual sites.</p> <p>Dealing first with the point about appraisal being insufficient systematic, we disagree. We suspect that the respondents may be envisaging a scoring system, which is sometimes seen in SA reports, with complex multi-criteria scoring matrices for individual sites and overall site 'scores'. This kind of analysis is in the view of the council neither helpful to plan-makers nor understandable to the public who would engage in plan-making.</p> <p>Furthermore, presenting judgements as complex scoring matrices or as a multi-criteria analysis gives the appearance of being systematic, but it simply hides the fact that underlying all those scores are necessarily judgements. The approach taken in the SA report is more transparent.</p> <p>On the second point, eight housing growth scenarios were identified (see para 6.2.1) which are different combinations of four variable components: Long Lawford, south of Rugby, North West Rugby and Lodge Farm. Accordingly, the commentary in section 6 (Growth scenarios appraisal) is structured around the differential sustainability effects of</p>

	<p>these component parts. The appraisal summary, at para 6.2.57 then comments on the overall performance of the growth scenarios.</p> <p>Overall, it is clear that each of the growth scenarios is assessed equally.</p>
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Issue	Unclear how Sustainability Appraisal has informed selection of individual housing allocations because it draws on the outputs of Stage 2 site assessment which had already selected allocations
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	<p>This comment misses that plan-making and sustainability appraisal is a process which is not totally reducible to a final report.</p> <p>Both site assessment and sustainability appraisal are an iterative process. At preferred options consultation stage a greater number of alternative site options were identified in the stage 2 site assessment and were not at that point ruled out. Similarly this was the case in the interim SA report.</p> <p>Plan-makers and the SA consultants met to ‘workshop’ different site options at various stages in plan-making and the outcomes of this are reported in, for example, the discussion of site options at section 5.3 and 5.4 of the SA report.</p> <p>However, by Regulation 19 the options needed to be narrowed to a final submission version of the plan. There was a need to set out why site options which did not form part of the Proposed Submission Local Plan were not selected and the Stage 2 Site Assessment (document SS8) was updated to do this.</p> <p>This does not, however, mean that the site allocations were presented to the SA authors at the end of the process as a fait accompli.</p>

Issue	SA's assessment of the reasonable alternatives is not informed by rigorous evidence to confirm that the Council has fully exhausted sustainable locations beyond the green belt, before determining that 50% of the S6 sites will be subject to green belt release.
Who raised the issue	Midlands Land Portfolio; Mitchell, Stuart
No. raising the issue	1
Council response	This is a variant of a Green Belt exceptional circumstances argument made by the promoters of non-Green Belt omission sites also in relation to Policies S6 and S7 and is responded to above.

Issue	Education models have not been published for scrutiny and transparency
Who raised the issue	Long Lawford Residents
No. raising the issue	516
Council response	<p>An Education topic paper has been published summarising the outcomes of modelling (I11). This provides proportionate evidence for plan-making. It is important to remember that the council is producing a land use plan, not a plan for future school place provision, which is the responsibility of Warwickshire County Council (WCC) as local education authority.</p> <p>The education model was prepared using data kindly supplied by WCC to the council's consultants. The council is not willing to, and WCC has not consented to, the publication of the raw models and data. In the same way, the data models used to compile the Strategic Transport Assessment and Water Cycle Study are not published.</p>

Issue	Lack of consultation on a site or policy added at Reg 19
Who raised the issue	Willis, Tim; Long Lawford Residents; Walker, Rebecca; Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Dunchurch Park Estates Ltd; BRAID (Barnacle Residents); Warwickshire Property and Development Group (site 90); Timms, Heather
No. raising the issue	634
Council response	<p>This comment is raised in relation to other sites/policies above. The comment is a reference to the site or policy not being identified as a preferred option as part of the second Regulation 18 consultation.</p> <p>The Statement of Community Involvement (SCI) specifies that a Regulation 18 consultation and Regulation 19 consultation will be undertaken for the local plan, each to last a minimum of 6 weeks. The Council has fulfilled this commitment; indeed, two Regulation 18 consultations were undertaken rather than one.</p> <p>It is a normal part of the process for policies or sites to be changed, added or removed between the Reg 18 and Reg 19 stages of plan-making. This enables plan-makers to respond to additional evidence that is gathered and to consultation responses received.</p>

Issue	There is a reasonable prospect of a scheme for Gibbet Hill coming forward during the plan period and Strategic Transport Assessment should have modelled a strategic intervention there. In the absence of that, highways constraints shouldn't be referred to as a reason for rejecting site 325
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes

No. raising the issue	4
Council response	<p>The first part of this comment relates to the treatment of the A426/A5 Gibbet Hill junction in the Strategic Transport Assessment (STA). The STA identifies this junction as an existing constraint and identifies mitigation at this junction as being required early in the plan period.</p> <p>However, a scheme for this junction is still being developed by National Highways, is currently unfunded and the nature of the scheme is unknown. It was therefore not possible for the STA authors to realistically design and model a scheme for this junction, instead it was simply unconstrained in the model on the basis that a scheme would come forward.</p> <p>The main substance of the omission site promoter's complaint appears to be failure to model in the STA their omission site (site 325). This site is commented upon in the STA, and this provides proportionate evidence in relation to the omission site.</p> <p>It is generally an unusual step for STAs to model omission sites at all. However, a decision was taken to model a small number of omission sites. Site 325 was not one of those omission sites. It was not realistic as part of a proportionate evidence base to model every omission site or combination thereof. However, the absence of modelling does not mean that it is not possible to make comment on the likely transport/highways considerations relevant to individual sites and this is what the STA does for site 325.</p>

Issue	Green Belt assessment has placed large areas of green belt as grey belt - no explanation for how this area has been determined
Who raised the issue	Hassell, Eve; RBC Conservative Group
No. raising the issue	1
Council response	This issue is about the Green Belt Contribution Study (GBD1 and GBD2) which forms part of the plan's evidence base. These documents explain their methodology which is based on an application of national policy and guidance.

Issue	Paragraphs 6.27 to 6.29 and tables 6.28.1 to 6.28.6 of the Local Plan Viability Study state they cover testing of the cumulative impact of emerging policies. However, the figures in this table are expressed as the overall BLV whereas in the earlier tables the figures are expressed as £ per sqm so it is difficult to compare across the two sections. As the individual appraisals have not been made available it has not been possible to confirm that the cumulative assessments have been undertaken correctly.
Who raised the issue	Miller Homes
No. raising	1

the issue	
Council response	<p>The author of the representation has misunderstood the outputs. All the outputs in tables 6.27 in the Local Plan Viability Study (l1) are residual land values which are compared to the relevant BLV for each site.</p> <p>The earlier tables (e.g. tables 6.19.1 to 6.19.9 and 6.7.1 to 6.7.9) are also residual land values. None of these tables are expressed in square metre values as claimed in the representations. The references to “square metres” in table headings refers to the underlying sales values applied to the residential floorspace in each table.</p>

Issue	There appears to be an error on the base cost and total (before policy costs) stated for Houses in table 4.15.1 in the Local Plan Viability Study as the base cost is higher than the total cost. As the appraisals have not been provided it is unclear whether this error has been included in the appraisals themselves.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	This was merely a typo in the table. The correct cost has been applied in the appraisals. For the avoidance of doubt, the base cost is £1,467 per square metre (as can be seen in column 13 in Appendix 2) to which a 10% external works allowance is applied, resulting in a total of £1,613 per square metre

Issue	It is not clear why a blanket 7% professional fees has been applied across all typologies in the Local Plan Viability Study. We would typically expect to see 10% used for developments under 50 dwellings.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	Professional fees do not reduce with scale, so this suggestion is incorrect.

Issue	While there is reference at Table 6.30.1 in the Local Plan Viability Study to 5% contingency costs being assumed for Lodge Farm and North West Rugby “in line with main appraisal assumptions” there is no explanation of this figure in the assumptions section of the report and it is not apparent what it has been applied to.
Who raised the issue	Miller Homes
No. raising the issue	1
Council	All of the appraisals (both the typologies and the site allocations) incorporate a 5%

response	contingency in line with standard market practice. In the Lodge Farm appraisal within the Local Plan Viability Study (I1), it can be noted that this contingency equates to £18,951,218, which is 5% of base residential construction costs and external works (i.e. £329,586,370 plus £49,437,960). Arguably, the contingency should also be applied to the non-residential construction costs and the on-site plot construction costs. Applying the contingency to these costs would increase the contingency sum to £24,367,175.
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Issue	The Lodge Farm appraisal in the Local Plan Viability Study appears to include an erroneous £1,555,000 for A426 roundabout widening, but this is not included in the list set out in table 6.31.1.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	Noted. This cost has been removed from the latest appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).

Issue	The values set out in the report for affordable housing have not been applied in the Lodge Farm appraisal in the Local Plan Viability Study. Instead, it appears that a different lower set of assumptions have been applied.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	These values were based on the South West Rugby strategic allocation FVA values. Nevertheless, in the revised appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15), we have applied the same capital values for the affordable housing in Table 4.10.1. in the Local Plan Viability Study (I1) (i.e. £190 per square foot for social rented units). For the shared ownership units, the current value of £244 per square foot equates to 70% of market value (based on £344 per square foot) which is reasonable and we have retained this figure in our revised appraisal.

Issue	The assumptions for residential areas appear to differ from the 94 sqm average GIA used for the rest of the Local Plan Viability Study.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	The floor area in the Lodge Farm appraisal equates to an average of 92 square metres per private unit compared to 94 square metres in the main appraisals. The difference is minimal, but nevertheless we have re-sized all residential units to 94 square metres in our

	revised appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).
Issue	The assumed total sales rate of 180 units per annum in the Lodge Farm appraisal in the Viability Study is not agreed with. Suggested that the total open market sales rate per annum should instead be 180 units, based on 3 open market units per month, with 5 flags at any one time. This would bring the overall sales period down from 14 years to 10.5.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	This has no bearing on the outcome of the appraisal, as the land value is negative. Argus treats this negative land value as a 'dowry' resulting in a significant understatement of finance costs (as can be noted in the appraisal, there are currently no financing costs). So, speeding up the programme makes no difference to the outcome with the appraisal structured in its current form, as there would be no change to finance costs. We have considered the impact of inputting the BLV into the appraisal as a land cost and shortening the programme in the revised appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).
Issue	The community floorspace revenue is only applied to 10% of the floor area in the Lodge Farm appraisal in the Viability Study.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	Noted. This has been amended in the revised appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).
Issue	The commercial floorspace build rates don't equate to the rates quoted in the report in the Lodge Farm appraisal in the Viability Study.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	The commercial build rates reflected the assumptions made by the landowners of the South West Rugby strategic sites in their FVAs. The representation does not refer to a specific table in our report, we therefore assume that they are referring to the construction costs in Table 4.15.1 in the Local Plan Viability Study (I1). We have departed from the costs applied by the landowners at South West Rugby and applied the costs in Table 4.15.1 in our revised appraisal in the Local Plan

	Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).
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Issue	Considered that sales values should be increased above £340 per square foot to £344 in the Lodge Farm appraisal in the Viability Study.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	No evidence has been submitted to support this revised figure, but we have tested it in our revised appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).

OTHER ISSUES: POLICIES MAP

4.178. 11 representations on behalf of 12 individuals or organisations raised issues of soundness with the policies map. 1 representation on behalf of one individual/organisation argued that the policies map is sound.

Issue	Green Belt boundary in Wolston should be updated to return Linden Tree Bungalow site allocated in the 2019 Local Plan to the Green Belt due to omission of key information at the time of allocation making this site not legally compliant
Who raised the issue	Larkin, Thomas
No. raising the issue	1
Council response	<p>Linden Tree Bungalow was allocated for development in the Local Plan 2011-2031 and at that time removed from the Green Belt and subsumed into the settlement boundary of Wolston. The position of the council is that the site can now come forward as windfall. The respondent argues that the highways evidence produced for the 2011-2031 local plan was deficient in relation to the safety of the access. Mr Larkin attended the local plan examination in 2018, and his arguments were considered by the inspector in assessing the suitability of the site allocation.</p> <p>The council has not seen anything to suggest that suitable access to the site could not be achieved. However, any planning application that were to come forward on the site would need to be assessed by the local highways authority in relation to the suitability and safety of the access.</p> <p>Overall, the council does not consider that there are exceptional circumstances demonstrating that the Green Belt needs to be changed to include the site within the Green Belt.</p>

Issue	Settlement boundary for Houlton should be extended to include the areas of green space and playing pitches
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The council disagrees. There is not a reason why these areas should be subsumed into the settlement boundary as they are proposed for public open space. Including these areas within the settlement boundary would be inconsistent with the drawing of the settlement boundary elsewhere in Rugby. For example on the southern edge of Rugby where Diamond Jubilee Country Park and Rugby Borough Football Club are not included within the settlement boundary.

Issue	Not necessary to remove the existing industrial estates at Ansty Park and Prologis Park Ryton from Green Belt and so contra NPPF para 148
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	<p>The rationale for removing these areas from the Green Belt is set out in the Green Belt Exceptional Circumstances Topic Paper (GBD4). Given new allocations are proposed to be removed from the Green Belt consistency would suggest removing these longstanding employment areas from the Green Belt. The Green Belt evidence (GBD1) shows the areas make very limited/no contribution to Green Belt purposes and are grey belt.</p> <p>Removing these sites from the Green Belt would help their future operation as employment sites by removing the need to demonstrate very special circumstances for development and notify the government's planning casework unit before a decision is made.</p>

Issue	Remove area of site 130 shown as suitable for wind energy development as site is promoted for employment use and is not available for that use
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The areas shown are those assessed by the council as potentially suitable for wind farm development in accordance with NPPF para 165b). The evidence for this is documents CL3 and CL4. Identifying areas a suitable is not the same as a site allocation. These areas have not been promoted for wind energy development and the fact that current land promoters are not proposing the land for wind energy development does not affect its potential suitability for this.

Issue	Extend the Rainsbrook Valley Landscape of Elevated Sensitivity (EN3) designation to the whole of the valley - grounds for limiting its scope are unsupported.
Who raised the issue	J Marine Limited
No. raising the issue	1
Council response	The extent of the landscape designation is based on document EN3, which provides the evidence for this. We do not have evidence to support the extension of the area. The southern edge of the valley lies within West Northamptonshire district and any protection for this would be a matter for West Northamptonshire Council.

Issue	Rugby Urban Area boundary is not clearly defined on the map (nor in the plan itself)
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	The settlement boundary for Rugby and other settlements is clearly defined on the policies map and referred to in Policy S5 Countryside Protection.

Issue	Land off Hinckley Road (M6 Junction 2) should be removed from the green belt designation as the evidence base does not support its inclusion given poor performance to green belt functions
Who raised the issue	Swanvale Developments Ltd
No. raising the issue	1
Council response	The council's Green Belt evidence does not support the contention that this omission site lies in an area which contributes weakly to Green Belt purposes. However, in any event, there is no assumption that areas which are potentially grey belt should be removed from the Green Belt.

4.179. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Extend the Rainsbrook Valley Landscape of Elevated Sensitivity (EN3) designation to the whole of the valley - grounds for limiting its scope are unsupported.	J Marine Limited
Coventry Stadium, Brandon should be designated as a sports facility on the Policies Map to ensure consistency with other policies that see protected areas already	Carter, David

designated on map.	
<p>Council response to modification proposals: The council's response to the point raised by J Marine Limited is outlined above. In relation to the suggestion of David, Carter the council does not consider it necessary for soundness to identify Coventry Stadium, Brandon or other community facilities on the map.</p>	

APPENDIX 1: STATEMENT OF REPRESENTATIONS PROCEDURE

STATEMENT OF REPRESENTATIONS PROCEDURE

Rugby Borough Council Local Plan 2025-2042 Proposed Submission Local Plan Regulation 19

1. STATEMENT OF REPRESENTATION

1.1 Rugby Borough Council intends to publish and submit a Proposed Submission Local Plan for examination, in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19, 20, 21 and 35), as amended (the Regulations).

2. TITLE OF DOCUMENT

- Rugby Borough Council Local Plan 2025-2042 Proposed Submission Local Plan

3. SUBJECT MATTER AND AREA COVERED

3.1 The Local Plan sets out the future land use planning policies for Rugby Borough through the period 2025 to 2042. It is a legal document which all councils are required to prepare. It will be used to assess all planning applications received by the Council and allocates land for new housing and employment developments, in line with national policy and requirements.

3.2 The Proposed Submission Local Plan is a single, comprehensive local plan which combines the spatial strategy, strategic policies and site allocations, in addition to development management policies. Once adopted, this Local Plan will replace the current Rugby Borough Council Local Plan 2011-2031, adopted in June 2019.

3.3 This Statement of Representations Procedure will be available for inspection alongside the plan documents and evidence base.

4. HOW TO VIEW THE LOCAL PLAN DOCUMENTS

4.1 The Rugby Borough Council Proposed Submission Local Plan and all supporting documents are available to view online and download at:
<https://www.rugby.gov.uk/local-plan-consultation>

4.2 Hard copies of the documents are available for inspection at the following locations within their normal opening hours:

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

4.3 Please check opening times for libraries at:

<https://www.warwickshire.gov.uk/findalibrary>

5. WHEN TO MAKE REPRESENTATIONS

5.1 Representations must be made during the consultation period which runs from **Friday 30th January 2026 to 5:00pm Friday 13th March 2026.**

5.2 Representations received outside this period will not be considered by the council or sent to the Planning Inspectorate.

6. HOW TO MAKE REPRESENTATIONS

6.1 Representations should be made using the Representation Form. The Representation Form can be downloaded from:

<https://www.rugby.gov.uk/proposed-submission-local-plan>

6.2 Hard copies of the Representation Form are available in locations where documents are available for inspection (see 4.2 above).

6.3 Completed Representation Forms can be submitted either by email or in writing:

- By email to localplan@rugby.gov.uk with 'Proposed Submission Consultation' in the subject line, OR
- By post to
Proposed Submission Consultation,
Development Strategy,
Town Hall,
Evreux Way,
Rugby,
CV21 2RR

6.4 Your representation may be accompanied by a request to be notified at a specified email or postal address of any of the following:

- Submission of the local plan for independent examination under section 20 of the Planning and Compulsory Purchase Act 2004 (the Act)
- The publication of the recommendations of the person appointed to carry out an independent examination of the local plan under section 20 of the Act
- The adoption of the local plan

6.5 We must receive your representation **by 17:00 on Friday 13th March 2026**.

6.6 **Representations must include your full name and address.** The Council cannot accept anonymous submissions and they cannot be considered by the Planning Inspector.

7. WHAT HAPPENS AFTER THE CONSULTATION

7.1 After the Regulation 19 consultation closes, the Council will review all representations made and prepare the plan for submission to the Planning Inspectorate to be examined.

7.2 All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan, and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

7.3 The Rugby Borough Council Privacy Notice for Development Strategy is available here: <https://www.rugby.gov.uk/w/privacy#development-strategy>

7.4 The Planning Inspectorate's privacy notice can be accessed here: <https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices>

7.5 Once submitted, an independent Planning Inspector will be appointed by the Secretary of State for Communities, Housing and Local Government to carry out an independent examination into whether the plan is legally compliant, passes the tests of soundness, and meets the duty to cooperate.

7.6 The examination will include hearing sessions held by the Planning Inspector in public where those who have made representations during this Regulation 19 Consultation will have a right to speak. Please indicate if you wish to be invited by the Planning Inspector to speak during a hearing session on your Representation Form.