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Overview

This document sets out a summary of the responses made to the consultation on the Local Plan Publication Draft Consultation Document\(^1\). The Council originally consulted on the publication draft of the Local Plan from Monday 26 September 2016 to Friday 11 November 2016.

The largest proposed allocations within the Publication Draft, to the South West of Rugby and at Lodge Farm to the south of the Borough, caused understandable concern amongst the local communities. Following an unprecedented amount of consultation responses being received during the initial consultation period and requests for more time to review the proposals, the Council agreed to hold an additional six week public consultation which ran from Wednesday 30\(^{th}\) November 2016 to 5pm on Wednesday 11\(^{th}\) January 2017.

The aim of additional consultation time was to allow these communities longer to fully understand the proposals and make comment on their soundness.

The Council consulted on the publication draft of the Local Plan to seek views in terms of the plan’s legal compliance, compliance with the duty to co-operate and the four tests of soundness outlined below.

The plan must be:

- **positively prepared** - the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where reasonable to do so and consistent with achieving sustainable development
- **justified** - the plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence
- **effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- **consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with policies in the National Planning Policy Framework

\(^1\) The document does not take account of the updated STA work that is currently ongoing and will be revisited once the findings are known
Respondents who made representations to the earlier Publication Draft Local Plan consultation were informed that their original representation would be taken into account and they did not need to make further representations. This was achieved through using our Register of Consultees database.

**How did we consult?**

The Publication Draft consultation was undertaken in accordance with Regulation 19, 20 and 35 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012. A summary of the consultation activities are outlined below.

**Notification of the consultation**

**Website**

The Publication Draft consultation paper, background documents and consultation forms were made available to view and download on the Council’s website on a specific ‘Publication Draft page. In addition, the consultation form could be completed and submitted online. The website was also continually updated throughout the consultation period to publicise forthcoming public meetings and events, where relevant.

**Deposit Points**

Paper copies of documents were available at locations across the Borough including the Town Hall and Dunchurch, Wolston and Rugby libraries.

**Correspondence**

At the start of the consultation we notified all individuals who had expressed an interest in the Local Plan or who had responded to previous consultations by writing to inform them of the consultation period and availability of documents. This included a large number of individuals, as well as a wide range of groups and organisations representing the local community.

All Statutory Consultees (as outlined in the adopted Statement of Community Involvement) were notified and invited to engage in the process. All Parish Councils and Councillors were notified of the consultation by letter in advance of Full Council approval of the document in July 2016 and then again upon the opening of the consultation period in September 2016.
Press articles/publicity

The consultation was advertised as follows:

- A press release was sent out in July 2016 to inform people of the forthcoming Local Plan consultation. A further press release was sent out on the 8th November 2016 regarding the Council’s consideration of a second consultation period.

- Public notices were placed in the Rugby Advertiser newspaper on the 29th September 2016 and 1st December 2016 (for first and second consultation phases respectively), the Hinckley Times on the 28th September and 30th November, and the Rugby Observer on the 29th September and 1st December, outlining the dates of the consultation, where copies of documents could be obtained and ways in which people could respond;

In addition to the above, a number of articles appeared in local newspapers documenting the consultation and outlining local interest and debate.

Meetings/workshops

Officers organised and attended public drop in sessions across the Borough, arranged with Councillors, Parish Councils and local organisations. Copies of consultation documents and response forms were also distributed at these meetings. A full list of meeting and exhibitions is below:

Phase 1 – 26th September 2016 to 11th November 2016

- Fosse Community Forum – 21st of September 2016
- Rugby Town East Community Forum – 22nd September 2016
- Wolvey – 26th September 2016
- Rugby Town West Community Forum – 28th September 2016
- Grandborough – 29th September 2016
- Clock Towers Shopping Centre - 1st October 2016
- Binley Woods – 6th October 2016
- Dunchurch – 10th October 2016
- Brinklow – 11th October 2016
- Ryton on Dunsmore – 12th October 2016
- Binley Woods 13th October 2016
- Wolvey 19th October 2016
Following a large number of responses to the first consultation and requests from respondents to be given more time to comment it was agreed at a Council meeting held on the 15\textsuperscript{th} November 2016 that a further consultation period be opened. During the second consultation phase, Rugby Borough Council engaged with several local groups that had made representations to the plan and also had further meetings with Parish Councils to discuss the issues raised. These are listed below.

Phase 2 – 30\textsuperscript{th} November 2016 to 11\textsuperscript{th} January 2017

- Save Dunchurch – 16\textsuperscript{th} December 2016
- Stand Against Lodge Farm Village – 3\textsuperscript{rd} January 2017
- Sustainable Hillside And Rokeby Education – 4\textsuperscript{th} January 2017
- Willoughby Parish Council – 5\textsuperscript{th} January 2017
- Stop Ashlawn Road Development – 6\textsuperscript{th} January 2017
- Woodlands Resident’s Association and Friends of Lime Tree Avenue – 6\textsuperscript{th} January 2017
- Dunchurch Parish Council – 9\textsuperscript{th} January 2017
- About Turn – 10\textsuperscript{th} January 2017
- Thurlaston Parish Council – 10\textsuperscript{th} January 2017

\textbf{Representations}

The representations raised during both phases of the Publication Draft Local Plan consultation have been summarised in this document. In addition to the individual comments raised, petitions were also received in response to the proposed strategic allocations within the plan. As well as comments received on the draft plan itself, comments were also received on the accompanying Sustainability Appraisal. Independent consultants LUC have produced the Sustainability Appraisal throughout the production of the Local Plan were asked to produce response to those comments raised. This is appended to the back of this document at Appendix 1.
1. Introduction

The Local Plan contains an ambitious vision and sets the objectives of how to achieve that vision. In this section is an assessment of whether consultees agree with our vision and objectives.

What did consultees say?

- A comment was received requesting the Duty to Co-operate section in this chapter be updated to reflect the outcome of the Coventry-Warwickshire. Housing Market Area 2014-based Subnational Population and Household Projections report, which was produced to inform Coventry City Council’s Local Plan examination to take account of the latest sub national population projections release.
- Another representation commented that Rugby Borough Council had not engaged in an effective manner with neighbouring authorities or considered the needs of Coventry City Council in a sustainable way as illustrated by the obligations accepted by the Memorandum of Understanding (MoU).

RBCs response to comments

- The Duty to Co-operate section mainly provides an overview of the work undertaken and does not go into detail about the documents considered. Reference to the Housing Market Area 2014-based Subnational Population and Household Projections report is considered suitable at paragraph 4.7, which refers to evidence of housing need.
- Rugby Borough Council considers that it has engaged with neighbouring authorities satisfactorily. Obligations of the MoU have been met through with housing target reflecting the needs of Rugby and Coventry.
2) Context, Vision and Objectives

The context, vision and objectives set out how in 2031, Rugby will be a place where people are proud to live, work and visit.

What did consultees say?

- Concern has been expressed that the vision for the town centre is not being upheld by planning decisions which have permitted out of town retail parks.
- One consultee considered that the spatial strategy is at odds with the vision for residents being connected by sustainable public transport.
- There is support for the vision of an expanding, diverse economy with high quality employment opportunities. A consultee expressed that there is not an over-reliance on the logistics sector due to the importance of the logistics sector in job creation.
- Comments were received expressing a desire to strengthen links with Coventry and specifically to elevate the status of Ansty Park site to that of a regionally significant employment site. Furthermore, it was expressed that significant development is needed on the edge of Coventry to accommodate Coventry’s need, in accordance with the Memorandum of Understanding (MoU).
- Conversely, a consultee responded that the vision should mention protection for the green belt to prevent development at the edge of Coventry.
- A further comment was received stating that the Memorandum of Understanding should have been subject to a sustainability appraisal as the emergence of unsustainable sites could risk housing delivery. Concern has been expressed that Nuneaton and Bedworth Borough Council has not signed up to the MoU, which risks undermining housing delivery within the Housing market Area.
- It has been expressed that a spatial objective of boosting housing supply should be added owing to past under-delivery of housing completions.
- Support has been expressed for the vision emphasis on protecting, utilising and enhancing historic assets whilst ensuring all new development demonstrates high quality design.
- It has been requested by a representative from the Police that a greater emphasis on safety, security and reducing crime in line with ‘secure by design’ principles is included to comply with national policy.
- One consultee considered that the Local Plan does not address the socially deprived areas of the borough.
RBCs response to comments

- The Spatial Vision sets out how the retail parks on Leicester Road connect to and complement the town centre. Whilst Rugby Borough Council cannot comment on individual planning applications within the context of the Local Plan, where it can be demonstrated that town centre units aren’t suitable for a proposed use and there is not a significant adverse impact on the Town Centre out of town locations can be considered for main town centre uses. As such, appropriate out of centre retail development is in line with the vision.

- Access to sustainable public transport is consistently at the heart of the spatial vision. Evidence for this is in how the majority of housing is proposed to be allocated adjacent to the Rugby Urban Area, considered the most sustainable location within the Borough, and the Infrastructure Delivery Plan details how new development will be supported through new infrastructure provision.

- The spatial objectives are considered to set a vision for a growing and balanced economy. The vision is to provide a varied portfolio of employment land which will serve to help all sectors of the local economy develop in a balanced way to ensure sufficient levels of job creation whilst ensuring a diversity of local employers.

- As a technology park for predominantly engineering and manufacturing businesses, Ansty Park is already supported through Spatial Objective 4 and therefore the site already has sufficient recognition.

- The spatial vision sets out how the majority of housing and employment will be focused on the Rugby Urban Area as it is considered the most sustainable location for development.

- As green belt land has specific protection in national planning policy, which the Local Plan reflects, it is not considered necessary to mention protection for the green belt in the spatial objectives.

- Rugby Borough Council is satisfied that it has a development strategy that outlines a sufficient number, size and location of sites to deliver the housing requirements to meet the agreement set out in the MoU. Rugby Borough Council encourages all authorities to meet their commitments as part of the duty-to-cooperate.

- A specific spatial objective of boosting housing supply is considered unnecessary given the emphasis throughout the plan on housing delivery

- Matters of public safety relating to crime are considered to have been sufficiently addressed for the Local Plan. For example, the Infrastructure Delivery Plan outlines proposed emergency’s services infrastructure at key sites throughout the Borough. Matters such as ‘designing out crime’ are routinely addressed at the Planning Application stage and through Building
Regulations so it is not considered necessary to provide further reference to safety, security and reducing crime within the vision and objectives.

- The Spatial Vision is supportive of regenerating socially deprived areas. The policies contained within the Plan will help shape communities though identifying the reasoning for deprivation goes beyond the scope of the Local Plan.
3) General Principles
With two thirds of the Borough being designated green belt land, the distribution strategy of new homes and employment space is one of the key issues that consultees considered.

What did consultees say?
• GP1 does not fully reflect the NPPF paragraph 14 as it fails to state where relevant policies are silent.
• The Local Plan Allocations do not reflect principles of sustainable development as unmet need from Coventry City Council is not being met adjacent to Coventry’s City boundary.
• A number of respondents agree that Rugby Town should be the main focus for development and that this is consistent with national planning policy and is the most appropriate strategy when considered against the alternatives.
• Allocations proposed in the Plan should be in conformity with the settlement hierarchy contained in Policy GP2.
• Development of the Lodge Farm site does not accord with the settlement hierarchy with it being in an open countryside location, which is the fourth tier in the hierarchy.
• It is considered that Policy GP2 and its supporting text should be cross referenced with Policy DS3 in relation to the Lodge Farm site, which states that the site would become a main rural settlement, to ensure there is consistency within the Plan.
• There should be an additional tier titled “super” main rural settlement for Ryton on Dunsmore given its capacity to grow and the existing services within the village.
• GP2 only allows for infill development within the defined main rural settlement boundaries, which is considered the most sustainable location beyond the Rugby Urban Area. Further allocations should be made at the main rural settlements, where there is already a good range of services and public transport. This will assist the Council to ensure it has a five year land supply.
• GP2’s restrictive approach to Rural Villages has resulted in an unhealthy consequence with existing smaller properties being extended reducing the number of 2-3 bedroom dwellings. An allowance for limited development to support 2-3 bedroom dwellings should be made in the Local Plan.
• The Green Belt housing allocations should set out a circumstance where developments in the Green Belt could occur outside of national policy.
• The supporting text to policy GP2 suggests development adjacent to neighbouring authority areas would not be sustainable. This is at odds with other Warwickshire authorities that are proposing to allocate development at such locations.

• GP2 settlement hierarchy does not reflect the fact that the Plan is meeting the unmet need of Coventry City Council and therefore it is not sustainable. Therefore there should be an additional tier for Coventry Edge within the settlement hierarchy.

• CPRE considers that in relation to GP2, the main rural settlements ‘inset’ in Green Belt should be ‘washed over’ entirely by Green Belt. Small villages containing open land within them should also be washed over and included in the Green Belt.

• In relation to GP3 Historic England seek clarification as to what is expected of them when advice is sought from them in relation to the evidence on impacts on any heritage assets. The body also seek that non designated assets are conserved as many will be of architectural and historic interest.

• In relation to Policy GP4, there is no policy basis within the National Planning Policy Framework or evidence to justify preventing development on the grounds that it might prejudice the development potential of other land. Furthermore, it is considered that ‘other land’ should also be defined. Where comprehensive development of an area could take place, it is considered that a masterplan SPD could also assist the allocated sites.

• Policy GP5 does not distinguish between statutory Neighbourhood Plans and non-statutory Parish Plans. It needs to be clear that any such Plans should be in general conformity with the strategic policies of the Local Plan, as set out in national policy.

RBCs response to comments

• The addition of the word ‘silent’ is proposed to be added to Policy GP1 to ensure consistency with NPPF paragraph 14.

• Policy DS3 makes allocations at 7 of the 9 main rural settlements which will play a supplementary role to the strategic growth needs of the Borough directed towards the Rugby urban area.

• The designation of the main rural settlement at Lodge Farm will coincide with services to be provided at the site and once these have come on stream they will be reflected in a future local plan.
• The restrictive nature of GP2 rural villages reflects the sustainability of these settlements. However, the policy is clear that development can occur within the settlement boundaries once the plan is adopted policy. This is not afforded in the current development plan policies. Policy H4, once adopted, will also permit Rural Exceptions to help meet affordable housing needs for local people that cannot be met within village boundaries.

• There is no reasoned justification to put rural settlements which have a defined settlement boundary back into the Green Belt. To do so will restrict development within such settlements.

• The Green Belt allocations contained within policy DS3 (with the exception of the Wolvey Campus) will be taken out of the Green Belt and form part of the settlement boundary. The Local Plan therefore does allow for development at the main rural settlements beyond infill development through the allocation of sites.

• GP2 reflects sustainable development. It would not be appropriate to add an additional tier for the edge of Coventry City’s boundary as the land is within the Green Belt and development of such locations can only be made following alterations to the Green Belt through the Local Plan.

• Advice will be sought from Historic England in relation to planning applications. Consideration of non-designated assets will be provided through policy SDC3 Protecting and enhancing the Historic Environment.

• No changes will be made to Policy GP4 as the policy seeks to ensure land is not sterilised by developments which may compromise comprehensive developments of essential infrastructure being delivered.

• Policy GP5 is proposed to be amended to ensure there is distinction between statutory and non-statutory planning documents to ensure conformity with the NPPF and planning guidance.
4) Development Strategy

In order to maximise the amount of houses to be delivered, the Local Plan will seek to allocate the widest possible range, size and location of development sites. Each allocation responds to its setting in the most appropriate way.

What did consultees say?

- The vast majority of the representations received on the consultation were in relation to the policies contained within the development strategy chapter. These were received from site promoters, residents within the borough, local groups, statutory bodies such as Historic England and Warwickshire County Council, and other organisations such as the House Builders Federation (HBF).
- The independence of the consultants G L Hearn who produced the Strategic Housing Market Assessment (SHMA) was questioned as they also promote sites for developers, such as the Cawston Extension site which benefits from planning permission. Consultees expressed that this could be considered a conflict of interest.
- Some respondents questioned the continued validity of the SHMA, given the UK’s forthcoming exit from the European Union and as a consequence the household projections are now out of date. It was therefore felt that there was no longer a need for the extent of housing as proposed in the Local Plan.
- CPRE submitted ‘Critique of West Midlands Housing Needs Assessments’ (January 2016) which is critical of the SHMA and questions the ability to deliver the market and affordable housing need identified. CPRE consider a more appropriate housing target would be 8,000-9,000 dwellings. Conversely, representations from the development industry, including consortiums and the HBF were of the view that the overall assessment of housing need is a significant underestimation and does not include reference to the latest 2014 household projections. A critique of the SHMA submitted by Barton Wilmore on behalf of a number of developers considered that the housing target should be increased as the Housing Market Area need should be 5,005 dwellings per annum as opposed to 4,272 dwellings per annum.
- The justification of Rugby Borough Council meeting some unmet housing need emanating from Coventry City Council (CCC) was also questioned. In particular, the Memorandum of Understanding (MoU) was cited as not sufficiently demonstrating that CCC could not meet all of its own housing need.
- In terms of meeting the unmet need from CCC a number of respondents consider that this should only be done if it is sustainable to do so. Questions were raised about whether the housing target could be achieved given past delivery rates.
- In terms of the phased housing target some developers consider that unmet need from the first phase of the Plan period should be met within the first 5 years of the Plan once adopted and not by 2031.
- The Plan should be more flexible in terms of its housing and employment allocations therefore it should not need to be altered as a result of changes to projections and employment demand.
Further to this some respondents were of the view that the plan will unnecessarily over allocate land for development against the housing target. Linked to this, some respondents consider there are sufficient sites that benefit from planning permission which means that not all of the proposed allocations are required.

Many respondents felt Rugby Borough Council had not met the Duty to Cooperate by not allocating the unmet growth adjacent to Coventry City Council’s boundary.

Some developers have indicated that there is overreliance on large scale sites which take time to deliver therefore additional small scale allocations should be made to ensure a sufficient supply of housing.

The HBF stated the Local Plan should have contingency sites of around 10-20% of the overall housing target to ensure the housing is delivery throughout the plan period.

Many respondents, including Daventry District Council, did not feel the plan justified why provision needed to be made on greenfield sites in locations outside of the development strategy. Linked to this was a view that no analysis has been undertaken to explore how delivery on existing permissions/allocations and brownfield sites could be accelerated.

The site promoters of South West Rugby were of the view that DS8 should state ‘a minimum of 5000 dwellings’ rather than ‘up to 5000’ dwellings. Similarly it was suggested that the employment land allocation for this site should be expressed as a minimum requirement.

There was considerable concern, largely from local residents at the proposed allocations of South West Rugby (DS8) and Lodge Farm (DS10).

The ability of the proposed allocations to deliver at the required rate was questioned by respondents, many of which felt that there is significant development proposed within the south west of Rugby which would impact upon overall delivery rates. Conversely in their representation the promoters of the South West Rugby allocations were of the view that there are no technical or physical reasons that would prevent a higher rate of delivery of the site.

There was a clear theme in many of the comments from local residents about the loss of identity of Dunchurch village as it will be consumed into Rugby town by the South West Rugby allocation.

Many respondents were concerned about the potential for increased flooding in surrounding areas as a consequence of the South West Rugby and Lodge Farm allocations.

The close proximity of the distribution warehouses on the South West Rugby allocation to Thurlaston conservation area drew concern.

Many comments were received regarding the impact of the proposed allocations on existing services which were already considered to be at capacity. This included local schools, access to health care and the existing road network.

Although the provision of an onsite GP surgery on South West Rugby was welcomed, many respondents felt there would be issues in recruiting to the surgery as demonstrated in local surgeries in the area.

Doubts were also raised about the GP surgery at the Lodge Farm site particularly in relationship to who will run the surgery and the number of patients that would be required to enable its delivery.

The capacity of the existing road network generated the greatest level of comment. The crossroads in Dunchurch was commented on extensively, with many respondents of the view that it was already over capacity, resulting in congestion, noise and air pollution issues for the residents of the villages and also detrimentally impacting the historic core of the village. The
crossroads at Dunchurch would not be able to cope with the inevitable increase in traffic as a consequence of Lodge Farm and South West Rugby.

- There was a mixed response to the effectiveness of the spine road network as proposed in draft policy DS9. Some agreed that it would provide a more attractive route to Dunchurch crossroads whilst others felt that traffic coming from the new developments would continue to use the Dunchurch crossroads, in particular those heading towards Southam and Daventry. Concern was also raised at the timescales for the delivery of the spine road network. Given the existing problems at the crossroads many felt that this was too late in the delivery of the South West Rugby allocation and that it should be delivered in advance of any development of the allocation to properly address the impacts.

- Respondents felt the proposed allocations could not support the delivery of the spine road network financially.

- The site promoters of South West Rugby did not consider that the Pottsford Dam link was necessary to facilitate delivery of South West Rugby, or that its provision has been adequately justified in technical terms. Conversely Warwickshire County Council Highways were of the view that a North-South link between the M45 and the A4071 at Potsford Dam would provide a safer alignment to the site for traffic accessing north Rugby.

- Some respondents commented that the route alignment as currently proposed was inconsistent with that contained within the South West Rugby Supplementary Planning Document which was published for information alongside the Publication Draft Local Plan consultation.

- Some Respondents questioned the inclusion of the Bilton Fields site (off Ashlawn Road) within the South West Rugby allocation. This was also raised by the site’s promoter.

- Specifically in relation to Lodge Farm, respondents felt the site’s residents would ‘rat run’ through villages of Barby and Kilsby from Lodge Farm to access job opportunities at DIRFT. ‘Rat running’ concerns through surrounding villages and rural lanes were also raised from the Lodge Farm site travelling towards Leamington, M40, Southam and Banbury.

- Criticism was also extended to the evidence which informed the transport mitigation. Many respondents, including Daventry District Council were critical of the transport model which informed the Strategic Transport Assessment for not being extended to cover the Lodge Farm area and neighbouring villages. Northamptonshire County Council highlighted that additional modelling will be undertaken for the Lodge Farm site and that any mitigations identified should be incorporated into the Lodge Farm site allocation policy.

- The transport model has also been criticised for not incorporating up to date traffic counts and take account of development that has occurred since the model was first developed.

- Considerable comment was received concerning the potential loss or damage to Cawston Spinney as a consequence of the proposed South West Rugby allocation. Residents were concerned about the loss of wildlife habitat and ancient woodland. Conversely the site promoters felt there should be no specific size of buffer to Cawston Spinney as opposed to the 30m as stated in draft policy DS8.

- Respondents were also concerned about the large extent of land proposed for the allocation of development and the subsequent loss of agricultural land, in particular on the South West Rugby and Lodge Farm proposed allocations. Natural England is in general supportive of DS8 as a relatively strongly worded policy and pleased with the proposed SPD with associated masterplan, paras 4.28 and 4.42. The multiple ownership alongside the important role of green
infrastructure for the site makes these tools extremely important to ensure the natural environment is protected and enhanced in a strategic way.

- Concern was raised at the way in which the spine road network appears to cut through the ancient woodland. Masterplanning would protect local environment and improve local infrastructure.
- There were also concerns regarding the loss of footpaths from both the South West Rugby and Lodge Farm allocations.
- Biodiversity concerns specific to Lodge Farm were related to the impact on bird migration routes and loss of bird habitats as a result of the proposed development.
- Some respondents felt that the land where Lodge Farm is proposed is in a prominent position and that there would be difficulties in providing landscaping mitigation to sufficiently assimilate the site into the surroundings.
- Many respondents felt Lodge Farm is not a sustainable location for new development. The site is isolated and will be dependent on the use of the private car to access employment and services. Many of these respondents were of the view that Walsgrave on Sowe, which had been proposed for allocation in the Preferred Options Local Plan, is a more sustainable location as it is in close proximity to Coventry City, and therefore a more sustainable location to meet the unmet needs from Coventry than Lodge Farm.
- Government guidance allows for Green Belt swaps therefore Green Belt land should have been considered.
- A number of respondents highlighted that Lodge Farm Garden Village is not supported by the community.
- Natural England was disappointed to see that the Green Infrastructure Proposals Map in the supporting documentation for the plan does not acknowledge Lodge Farm and its potential role in the connection of existing ecological networks and its proximity through to the Oxford Canal. There were fewer comments regarding the proposed rural allocations. These tended to be by Parish Councils and residents of those villages which were allocated new dwellings through policy DS3. They expressed concern about the types of dwellings to be developed, the impact the allocations would have on the local transport network, services and flooding. A few respondents considered that exceptional circumstances for the release of Green Belt for housing has not been demonstrated with some stating that the extensions of settlements outside of the Green Belt has not been fully explored prior to the release of the Green Belt sites.
- Omission site promoters considered that their site should be allocated instead or in addition to ones identified within Policy DS3.
- Concern was raised by Princethorpe Parish Council about the impact of SW Rugby and Stretton on Dunsmore allocations on the highway network by Princethorpe; and specifically in relation to Stretton on Dunsmore allocations impact on flooding and services within Princethorpe.
- Ryton on Dunsmore Parish Council supported the allocation of land for residential development and the proposed removal of open space designation within the settlement boundary.
- Warwickshire County Council Archaeology considered that the Heritage Assessment Review provided an adequate assessment of any potential impacts upon the historic environment. Though account has not been taken of the non-designated heritage assets as contained within the Warwickshire Historic Environment Record. CPRE considered a full policy on the Green Belt was required. This should set out the role and purposes of the Green Belt in Rugby Borough and
policies to protect it; with any changes to the Green Belt boundary specifically listed, and justified in supporting text.

- Coton Park East allocation could be improved through the allocation of land for a secondary school
- Historic England raised concern at the potential impact the proposed allocation of land at Coton House will have on the Listed Building.
- One respondent stated the employment growth targets were too high and felt that the Cambridge Econometrics evidence was overinflated and should not be relied upon. Experian was referenced as being more accurate. The Coventry and Warwickshire Local Enterprise Partnership (CWLEP) Atkins study headline figure was also cited as being more accurate in informing employment growth.
- Respondents questioned the need for additional employment land allocations given the proximity of existing employment sites which are deemed to be in a better location than that of the employment land within the SW Rugby allocation.
- Concern was raised that the environmental impact of building large employment units in close proximity to Cawston Spinney had not been taken account of, and that employment development in this location would generate a vast amount of traffic and pollution for Dunchurch and surrounding areas.
- CPRE questioned the calculation of the overall employment target in terms of an uplift from the 79 hectare jobs growth forecast figure and a target that seeks to increase past take-up rates identified in the Employment Land Study. Concern was also raised with the Borough’s supply-demand balance, in particular why the area of employment land at Rugby Radio Station contributing to supply had been reduced. They also queried the need and suitability for the proposed employment allocation at SW Rugby and suggested allocations should only be made at Coton Park East and Rugby Radio Station, as well as querying the overall target in relation to sites at Ansty Park and Ryton in connection with the C&W Employment MOU.
- Stagecoach supported the employment allocation at SW Rugby as it considers this will rebalance journey to work flows across the urban area.
- Employment development at SW Rugby was supported by the site promoter(s) as a means of supporting the spatial requirements of the logistics sector as a key component of both the local and national economy. Comment was made that without the provision of new sites there will be a shortage of land for strategic distribution needs. It was also suggested that the 35 hectare allocation in the local plan related to the employment area only and not the associated land for landscaping, roads and drainage.
- The CWLEP and C&W Chamber of Commerce responded similarly on the issue of sub-regional economic growth and the need for further strategic employment sites to be identified, particularly on the edge of Coventry. It was argued that local authority methods for determining employment needs relies too heavily on labour force/demand projections and not enough on market signals, and therefore the 714 hectare target identified in the C&W Employment MOU is grossly inadequate. It was suggested that land should be removed from the Green Belt in the Ansty Park / Walsgrave area to allow sub-regional employment land supply to be increased.
- Site promoters with land interests on the edge of Coventry also put forward similar arguments concerning a need to allocate land in the Green Belt (and also the promotion of a site which the
local plan would require Green Belt release; known as Parcel C6 in the Green Belt Review) in this location for additional employment sites.

- Some respondents were of the view that due to recent take up in the area and a buoyant employment market in the sub-region, the overall employment land requirement for Rugby Borough was set too low at 110 hectares. Other site promoters, including those promoting land elsewhere in the Borough, suggested an early review of the local plan may be necessary if market forces identified that employment needs were too low and additional sites were required.
- Although many comments received were of concern on the extent and location of growth within the plan some respondents were of the view that the plan was well thought out.

RBC response to comments

- G L Hearn produced the SHMA and the subsequent updates for the entire Housing Market Area (HMA). This piece of evidence has been found sound by independent examination of Coventry’s, Warwick’s, Stratford’s and North Warwickshire’s Local Plans. Furthermore the NPPF is clear that the housing needs of the HMA must be produced consistently on a HMA wide level. To move away from this piece of evidence would likely causes issues of soundness and potentially Duty to Cooperate impacts for the authority.
- The consequences of Brexit on household projections are not yet clear. The Government maintains however, that local planning authorities must ensure that they continue to work towards an up to date adopted local plan and that the household projections are the starting point for arriving at housing need.
- The justification of Coventry City’s unmet housing need is borne out of the work undertaken at the HMA level by all HMA authorities. The report to the Coventry, Warwickshire and South West Leicestershire Shadow Economic Prosperity Board in September which accompanied the Memorandum of Understanding details the research and cooperation between the six planning authorities with responsibility for planning for housing need, as well as Warwickshire County Council, that determined the level of unmet need from Coventry and how this is distributed to the shire authorities. This is further reinforced by the Inspector of the Coventry City Local Plan accepting the evidence demonstrating the capacity of Coventry in meeting its own housing need. This approach and the MoU have also been accepted by the inspector of Warwick’s local plan.
- The distribution strategy has been informed by the necessity to vary the size and location of allocations within the borough to meet the annual housing target as discussed in the G L Hearn Housing Delivery Study and the role in which rural settlements can accommodate growth in a sustainable manner has been taken into account. The types and tenure of dwellings to be provided by the allocations and any other development proposals would need to comply with the housing policies contained within the Local Plan.
- The Local Plan is based on the 2012 household projections. The Inspector for Coventry City Council’s Local Plan Examination in Public requested that the authority produce a short paper which considered the impacts of the 2014 household projections. This paper showed there was very little difference in the housing needs of the HMA from the 2012 figures and the Inspector was content with the housing target to remain unchanged as a consequence. This position also
applies to Rugby. Notwithstanding this, a reference to the 2014 projections will be added to the Publication Draft Local Plan.

- The Strategic Housing Land Availability Assessment (SHLAA) considered sites submitted to the council. This process concluded the limited availability of brownfield land for allocation. Despite not being in a position to allocate brownfield land the Local Plan contains draft policy GP3 ‘Previously Developed Land’ which seeks to support the redevelopment of previously developed land.

- In relation to submissions from the omission site’s no alterations are proposed to be made to the Local Plan development strategy or the housing allocations. The Local plan development strategy represents the most sustainable strategy and the housing allocations ensure a continuous supply of housing to meet the housing target.

- Specifically regarding South West Rugby, up to 5000 dwellings is entirely appropriate to allocate on the site and for the site’s contribution to the housing target overall. This figure has informed the various evidence documents which identify the level of infrastructure required to support the local plan growth. A minimum figure on this site would make evidencing the local plan much more complex and uncertain. Furthermore it has the potential to place uncertainty on the alignment of the housing and employment targets.

- The Local Plan is supported by a Flood Risk Assessment and each proposed allocation is considered against this evidence. In particular none of the larger allocations are located outside Flood Zone 1 and they do not have surface water flooding issues that are considered insurmountable. This is supported by the representations made by the Environment Agency and the Local Lead Flood Authority which have raised no concerns on the proposed allocations at a strategic level. However, once a planning application is submitted on any of the allocations, the applicant would need to demonstrate compliance with the NPPF and the policies contained within the Local Plan regarding flooding.

- The proposed South West Rugby allocation policy DS8 is clear that a buffer between Rugby and Dunchurch must be maintained. It requires the entire site is built out in conjunction with a comprehensive masterplan as contained within the South West Rugby Supplementary Planning Document. It is through this document and subsequent planning applications that the exact nature of the buffer will be defined.

- The Local Plan is supported by the Infrastructure Delivery Plan, which is a live document and as such this will be continually updated. This details all infrastructure required to support the growth proposed for allocation. The type, amount, phasing and cost is informed by extensive and ongoing discussions with service providers including Warwickshire County Council Education, Highways, Coventry and Rugby Clinical Commissioning Group, Warwickshire Police, University Hospitals Coventry, Warwickshire NHS Trust and Western Power.

- Specifically regarding the highway mitigation, Rugby Borough Council has worked closely with Warwickshire County Council and Highways England to produce the highways evidence in the form of the Strategic Transport Assessment (STA). Following on from the Publication Draft consultation, the modelling which informs the STA has been updated. The base model has been extended to include the Lodge Farm area (extended to include A45/Longdown lane junction, villages of Barby and Kilsby) and all survey data has been updated in 2016 in school time. The Lodge Farm site trip distribution, taking account of committed and proposed employment allocations across within the locality such as Jaguar Land Rover sites at Whitley and Gaydon, Magna Park and DIRFT 3 has also been revisited and agreed with by Northamptonshire County
Council and Daventry District Council. The updated model also incorporates a specific Leicester Road corridor model which incorporates Saturday traffic alongside peak traffic data considered within the model.

- Draft policy DS8 makes specific requirements regarding Green Infrastructure and Cawston Spinney within the South West Rugby allocated area. Notwithstanding this, additional text will be added to para 4.57 in the supporting text to require a management plan to be produced for the entire site.

- Rugby’s most recent Employment Land Study provides an explanation of the differences between forecasting approaches used in determining employment needs. It acknowledges the conclusions of the C&W Employment Land Study (Atkins) and compares the merits of using data from various forecasts (Experian, Cambridge Econometrics 2013 and Cambridge Econometrics 2014) as well as how actual jobs growth data for 2011-13 compares with these forecasts. It is therefore considered to be an up-to-date and robust evidence.

- The overall employment land requirement for Rugby Borough of 110 hectares is considered to be justified by the Employment Land Study and uses data of labour demand, labour supply and past take-up, as recommended in national planning guidance. Each of these methods has limitations in projecting forward future needs and to base the employment target on only one of these approaches, as suggested in some representations to the local plan, could undermine the alignment of housing and employment growth in the plan.

- With regards to sub-regional employment needs, the C&W Employment MOU shows that Rugby Borough is in fact over providing on employment land provision for the needs of Coventry City, based on the redistribution of the overall shortfall identified in Coventry City’s Local Plan. Whilst a plan period of 2011-31 does mean a proportion of the employment target will have been delivered prior to adoption of the local plan, jobs growth is still being provided for in the plan period. This includes some parcels on strategic sites not yet completed and therefore sub-regional jobs remaining in supply, as well as future jobs growth from commitments and allocations in and around the Rugby urban area.
5) Housing
Sustainable development is at the heart of the planning system. Throughout the Local Plan process, the Borough Council has used sustainability as the starting point for future decision-making. Shaping the right type, mix and location of homes is central to Rugby Boroughs Local Plan.

What did consultees say?
• A respondent considered that Policy H1 does not allow for the provision of self-build as there are no provisions for small boundary amendments in small villages for well-designed development.
• A number of the development industry consider that the SHMA recommended market housing mix should not be contained within the Local Plan and instead it should only be in the Housing Needs Supplementary Planning Document (SPD) as this document will be updated more regularly.
• Some respondents considered the Policy H1 SHMA mix to be too inflexible. Consideration should be given to other factors such as market signals and trends, national policy and local evidence as demonstrated through a housing needs survey or a neighbourhood plan.
• Policy H2 affordable housing targets should be based on a whole plan viability assessment to ascertain whether the policy is achievable.
• The affordable housing mix and tenure should be more flexible to take account of wider affordable housing products, market trends, housing needs surveys and specific site responses from registered providers.
• Housing Needs SPD needs to be updated to reflect the national policy and the SHMA. It should not contain any financial burdens on development in accordance with the NPPF.
• The affordable housing target will not meet identified affordable housing need contained within the SHMA.
• One respondent considers that clarity is required to ensure that Policy H2 does not relate to C2 proposals.
• The Local Plan should set out a commitment as to when and how it will review its housing policies in relation to upcoming national planning policy changes, particularly in relationship to affordable housing requirements and products.
• Concern raised that Policy H3 will result in the development of houses in open countryside and instead consideration should be given to temporary accommodation.
• The affordable housing definition set out in the Local Plan Glossary should reflect that set out in NPPF Annexe 2.
Respondents highlighted that open market housing is allowed as part of rural exception sites to support the delivery of affordable housing, whilst Policy H4 seeks to deliver significant affordable housing. It is also viewed that viability considerations are not taken account of.

A respondent requested additions to Policy H4’s requirement to demonstrate that there are no suitable sites within the existing defined settlement boundary, and for the proposal not to have an adverse impact on the character and/or appearance of a settlement, their setting or the surrounding countryside, and is not consistent with national planning policy. Clarification as to what is deemed ‘suitable’ is also required.

A respondent noted that some affordable housing tenures allow for ‘stair-casing’, meaning that some rural exception dwellings will not remain affordable in perpetuity.

Policy H6 does not define ‘large development proposals’ or ‘meeting the needs of older persons’. It is also considered that the policy restricts development to large development sites only, which is not consistent with the NPPF.

Policy H6 supporting text states that C2 development can count towards housing land supply and if this is the case it is recommended that the housing need for C2 bed spaces should also be identified as a separate element of the housing requirement in Policy DS1.

RBC response to comments

Policies contained within the Plan allow for development of sites that could be suitable for self-build. Further to this, policy GP2 proposes that development could occur within the settlement boundary of Rural Settlements, without the demonstration of a local need which is not afforded currently through the adopted Core Strategy.

The supporting text to Policy H2 states any final housing mix achieved on any site should be informed by an up to date position set out in the Housing Needs SPD (taking account of any SHMA updates), any changes to the definition of affordable housing, any relevant site specific issues and evidence of local circumstances.

The affordable housing target is a deliverable target. The housing trajectory sets out that there will be an over provision of dwellings against the housing target, which enables the opportunity for further affordable dwellings to be provided in accordance with the SHMA.

It is proposed that the affordable housing definition will be amended to reflect the NPPF annexe 2 which will ensure that future affordable housing products will be covered within the local plan.

Policy H4 is deemed consistent with national planning policy where it requires the identification of sites within settlement boundaries prior to the release of green field sites which could be in Green Belt locations. The definition of ‘suitable’ is that contained within the national planning policy framework. Policy H4 wording of allowing market housing to facilitate the provision of
significant affordable housing to meet local needs is consistent with the NPPF. The policy also states that viability is a consideration, again consistent with the NPPF.

- Policy H6 does not restrict the location of specialist housing but seeks that its provision should be considered on large development proposals. The policy will be amended to clarify which developments this will be relevant to.
- The Local Plan will not be seeking an additional target for C2 bedspaces, therefore it is proposed that paragraph 5.46 is deleted.
6) Economic Development

Directing employment sites to the most sustainable locations is central to Rugby Borough’s Local Plan. This involves both protecting existing employment land and promoting new employment sites, where they can both play a role in the local and sub-regional economy.

What did consultees say?

- A representation from a site promoter considered that Policy ED1 did not have sufficient emphasis on the ability of existing employment sites to contribute to the qualitative demand for smaller units as identified in the Rugby Employment Land Study (2015), rather than this purely being a requirement, and the sole burden, of the proposed allocation of a new employment site at Coton Park East (see also Policy DS4/DS7).

- A site promoter responded saying that there is no mechanism in the local plan for the expansion of Ansty Park to reflect its importance in terms of both the Borough and regionally. It was stated that together with associated housing growth proposals, this could form a wider mixed use site that should be preferred to other sites proposed in the local plan.

- Another site promoter representation stated that Policy ED1 failed to recognise the importance of the Rolls Royce (Ansty) site, to allow for its optimum regeneration and redevelopment. It was considered that whilst the policy does allow for redevelopment of designated employment sites, the policy should be framed in a more positive way to allow for significant redevelopment of the Rolls Royce site in particular, thereby encouraging major investment in the site to the benefit of the local and sub-regional economy.

- Several representations commented that the requirements of Policy ED1 were overly onerous on developers and not positively prepared due to the burden of requiring marketing evidence to allow for the change of use of employment sites to other uses. They considered that this would slow the planning process down. It was suggested that the policy be changed to refer to other appropriate tests as well as marketing. Comment was made that the release of employment land is crucial in meeting housing needs. It was also argued that paragraph 22 of the NPPF only relates to allocated employment sites, whereas Policy ED1 goes too far in also protecting non-allocated sites.

- Concerning Policy ED2, site promoters for the proposed allocation at SW Rugby supported this policy by saying it was consistent with national planning policy and would enable the delivery of sustainable development.

- Regarding Policy ED3 and the potential for conversion of a building for employment purposes outside the Rugby urban area, Warwickshire County Council Archaeological Service supported
the policy’s acknowledgment that the building’s historic or archaeological merit should be a consideration in determining whether the conversion is suitable.

- Representation was made that Policy ED3 should also include the provision of Motorway Service Areas (MSAs) as an exception to where employment development would be considered acceptable outside of the urban area or other local plan allocations.
- Also in relation to Policy ED3, a site promoter suggested that the policy should be amended to allow for the provision of employment land on allocated sites that are not already covered by the designated employment sites listed in Policy ED1 or that fall within the urban area.
- The site promoter for Lodge Farm suggested that Policy DS10 should identify inclusion a 2 hectare employment site within the allocation, noting the importance of providing some employment land at Lodge Farm to help create a mix of uses in the new community.

RBC response to comments

- An amendment has been made to the supporting text of Policy ED1 to acknowledge in explicit terms that existing employment sites already provide for a range of employment occupiers, including those requiring smaller units. The intensification and redevelopment of existing sites will be encouraged, in particular where this will deliver new units or investment in current units up to 50,000 sqft.
- No change is proposed to explicitly refer to the redevelopment of the Rolls Royce site, which is already recognised as an important employment site through its designation in Policy ED1. Whilst the site is in the Green Belt, as it is a previously developed site with a significant previous footprint. It is considered that suitable provisions already exist in Policy ED1, consistent with the NPPF, to enable future investment in the site.
- Similarly, it is not considered that an expansion of Ansty Park for a mixed use development would accord with the strategy for meeting the assessed development needs for housing and employment as set out in the local plan. A range of evidence exists which demonstrates how development targets have been arrived at, and how site allocations are proposed to meet these targets. This evidence includes consideration of unmet need in the wider sub-region and how Rugby Borough is contributing to addressing identified shortfall as set out in the Housing and Employment MoUs for Coventry & Warwickshire.
- The supporting text to Policy ED1 was amended following the Preferred Options consultation to acknowledge that marketing is only one of the tests identified by evidence and therefore applicants may be able to demonstrate that other tests are more suitable in showing a loss of
employment land would not have an adverse impact on supply. No further change is considered necessary.
7) Retail and the Town Centre

The Local Plan recognises the need to respond to the changing role of town centres. This will be achieved through building on the town centres existing strengths through policies re-enforcing the town centres retail function yet allowing sufficient flexibility for changes of use, where appropriate. Proposed developments that would be considered ‘main town centre uses’ such as retail are directed towards the town centre first before other locations are considered.

What did consultees say?

- Comments were received expressing concern as to the cumulative impact on the town centre of out-of-town retail parks, with reference made to the closure of town centre stores.
- Concern was expressed in relation to the perceived lack of an overall plan for the town centre.
- Support was expressed for the principle of reducing the town centre boundary but one respondent objected to the principle of excluding the Clifton Road shops from the town centre boundary. This objection was on the basis that the row of shops on Clifton Road is considered a continuation of shops and services along Church Street. If excluded from the town centre, the Clifton Road shops should be afforded a formal status to afford a greater degree of protection to the retail units.
- An imaginative look at revitalising town centre brownfield sites should have been looked at.
- High quality dwellings and adequate parking will bring young people back to town centre to boost spending power for local shops in the town centre.

RBC Response:

- The Local Plan defines a role for the town centre as a retail, leisure and cultural destination which compliments existing out-of-town retail developments offering a different range of goods. The Local Plan is consistent with the existing approach in that any proposed future out-of-town retail development would have to demonstrate that it would not cause an adverse impact to the town centre.
- The Local Plan contains policies which will seek to support the redevelopment of town centre sites- such as the former Gala Bingo site on Evreux Way- as well as supporting the refurbishment of existing units for appropriate town centre uses as and when such units become available. In support of this, the town centre boundary is proposed to be contracted in order to ensure main town centre uses are focused in closer proximity to existing commercial uses. This will concentrate footfall around the Primary and Secondary shopping frontages by protecting their
retail function whilst allowing a greater mix of uses outside of these frontages. Residential living is also supported within the town centre to support its vibrancy.

- It is considered that collectively the town centre policy framework proposed within the Local Plan provides a coherent strategy to support the town centre and provides guidance for when planning applications are brought forward for individual development sites.
- The shops identified along Clifton Road will continue to be retained within the town centre boundary as they form an important element of the town centre with a number of retail units which will benefit from the protection afforded in the town centre polices. As such the town centre proposals map will be amended accordingly.
8) Healthy, Safe and Inclusive Communities.
The Council recognises the important role that spatial planning has in the creation of healthy, safe and inclusive communities. It is important that community needs are supported through appropriate physical and social infrastructure, as well as other facilities and services that contribute to improving overall quality of life, physical health, mental health and well-being.

What did consultees say?
- Of the representations received on this chapter, the majority of these were on policies HS1 and HS2.
- Regarding Policy HS1, Warwickshire Police (WP) and West Mercia Police (WMP) responded stating that this policy was inconsistent with the NPPF and that it would be difficult to secure consistent application of the policy from one development to the next. It was suggested that text incorporating ‘Secured by Design’ principles and standards was added to this policy.
- The Canal and River Trust emphasised their support for access to Green Infrastructure, including canals and their towpaths, to be addressed in Policy HS1. They also stated that they were satisfied previous comments at the Preferred Options consultation stage had been addressed by the Borough Council concerning supporting text to Policy HS4.
- A number of site promoters objected to Policy HS2 in that it is too onerous for developers to implement at planning application stage. They argue that the National Planning Policy Guidance (NPPG) places the onus on the health provider to assess whether a development will have an impact on the delivery of services, and that a housing proposal alone will not necessarily have an adverse impact on people’s health. It is further suggested that health infrastructure requirements for the entire local plan period should be determined on a Borough wide basis through the Local Plan’s Infrastructure Delivery Plan (IDP).
- Also in relation to Policy HS2, the House Builders Federation (HBF) acknowledged the same issue as site promoters above, that it is for the Borough Council to work with public health organisations to provide for the health and well-being of the population, rather than applicants for individual applications. If the policy is retained then it is suggested that a Health Impact Assessment (HIA) is only required where a significant impact has already been identified rather than a blanket imposition on all applications over 150 dwellings.
- An additional representation from a site promoter regarding Policy HS3 stated that the provisions of this policy, whilst welcomed in principle, should only apply where a local facility or services are in public use as otherwise the loss to the local community would be negligible.
• Regarding Policy HS4, comment was received from a site promoter that the supporting text should be amended to acknowledge where a site specific requirements may lead to an over provision of a certain open space typology, then this may be offset by under provision of another typology. This representation also raised concern that developments should not be ‘double charged’ for open space S106/CIL contributions if an existing deficit in open space was likely to be increased and the site crossed a Parish or Ward boundary.

• A further representation on Policy HS4 commented on the text that refers to off-site contributions to local facilities being made in a location which adequately serves the new development. It was suggested that “within walking distance” is added to this sentence to ensure the location of new facilities definitely serves the new development.

• Comment was received that Policy HS5 should be more consistent with NPPF paragraphs 123 and 124 on air quality, as the current requirement for ‘effective mitigation’ was too vague. Recommended that the text is amended to say new development should be consistent with local air quality action plans relating to the Air Quality Management Area (AQMA) the site is within.

RBC response to comments

• Policy HS1 is considered to already promote good design being used in new development to minimise the potential for crime and anti-social behaviour.

• Policy HS2 is intended to complement the more strategic level of health impact assessment already undertaken for the local plan, in consultation with health authorities and other relevant stakeholders. Consultation at the local plan level has already identified that the level of growth proposed in Rugby Borough over the plan period will have an impact on the provision of healthcare services. It is therefore necessary that more detailed assessment of potential impacts and mitigation required, if any, is undertaken and that this is only required for developments of a scale likely to have a significant impact in isolation on the provision of these services.

• Policy HS3 seeks to retain community facilities and services due to the important contribution these can make to a local community. This policy applies to services and facilities that provide for public use, regardless of ownership, and therefore seeks to avoid development that would result in a loss to the community.

• Policy HS4 sets out open space standards based on evidence contained in the Borough’s latest Open Space Study/Audit. It is considered these are an up to date and robust source of evidence and should be used as a starting point for considering open space provision for all new residential developments over the 10 dwelling threshold in the policy. Detailed issues concerning the exact composition of typologies on a site and the balance between on-site and
off-site provision will be determined through the development management process. The policy wording that requires off site contributions to be made towards local facilities in a location that serves the new development is considered to be justified and consistent with national policy and therefore no further change is considered necessary.

- In terms of Policy H5, the supporting text states that the Council will produce an Air Quality SPD and mitigation requirements for development proposals will be expected to be consistent with this. The preparation of the SPD will be informed by expertise from the Council’s Regulatory Services team and will therefore take full account of existing AQMAs and action plans, in order to determine how new development proposals impact on air quality.
9) Natural Environment

Throughout the policies in this section, the Local Plan will provide a policy framework to protect, enhance and (where appropriate) restore the Boroughs natural landscape, environmental assets and habitats. Where opportunities exist, policies will seek to improve public access, improve habitat connectivity and create new green infrastructure assets in order to strive for net gains in biodiversity.

What did consultees say?

- Comments received were generally supportive of the natural environment policies set out in the Local Plan.
- One consultee expressed an appreciation for the compatibility between NE4: landscape protection and SDC3: Protecting and Enhancing the Historic Environment.
- There was support for the recognition of ‘blue infrastructure’ although further clarity on its definition is requested. The supporting text to the Preferred Option document made specific reference to canals although has since been replaced with 'watercourses'. A consultee has requested that the references in Paragraphs 9.10 & 9.11 should be amended to 'canals and watercourse corridors'. Furthermore, this consultee considered that canals should be acknowledged as 'Blue infrastructure' and called for recognition as to the specific role of canals in providing recreational, economic and environmental benefits. For example, it was suggested that canals support outdoor physical activity and provide a 'natural health service' by acting as 'blue gyms'.
- A consultee considered that the proposed development at Lodge Farm creates the opportunity to provide new Green Infrastructure Areas and to link up the Strategic GI networks within the area that are currently disconnected.
- It has been proposed that the ‘Green Infrastructure Opportunity Area’ in the South West corridor shown on the Green Infrastructure Proposals map is extended to join up with the Strategic Green Infrastructure Network at Hillmorton. This would serve to link up the larger Strategic Green Infrastructure Networks thus helping to retain local movement of wildlife south of the town.
- One consultee highlighted how the proposed location of Lodge Farm falls within a Natural Character Area and nationally significant bird migration corridor. This is perceived to particularly affect Farmland Birds, which are a protected species It is proposed that a ‘green belt’ be formed around or adjoining any garden village development.
• A consultee interpreted that a net biodiversity gain is unnecessary. Suggested an alternative to biodiversity offsetting should be considered as it’s not the most appropriate method of calculating biodiversity loss and could result in inappropriate levels of compensation.

• Some respondents stated the Rainsbrook Valley should be included in the Green Infrastructure corridor or be designated as a countryside park.

**RBC Response**

• The policies within the local plan are considered to accord with government policy in that one of the key overall objectives driving the policies is to strive for net gains in biodiversity, in line with the NPPF.

• The recognition of canals as part of ‘blue infrastructure’ is considered to afford sufficient status to the Borough’s canal network as adding further details may place disproportionate emphasis on canals relative to other forms of blue infrastructure. As such, altering the wording to “canals and watercourses” is considered unnecessary as ‘watercourses’ is inclusive of canals.

• The strategic green infrastructure network proposed within the Green Infrastructure Proposals map was developed in conjunction with statutory consultees. Policy NE3 states that where appropriate new development must provide suitable GI linkages throughout the development and link into adjacent strategic and local GI networks or assets where possible. If deemed necessary during the planning application process mitigation measures could be agreed at a future date, but this falls outside of the local plan process.

• Green Belt allocation in itself will not guarantee any environmental benefits, so is not considered necessary.

• Although the Rainsbrook Valley clearly is a locally attractive environment, it does not have any nationally or locally significant designated areas which could soundly inform a specific local plan designation or inclusion within the Green Infrastructure Network. Furthermore, policies within the Local Plan enable the protection of landscape and GI assets.

• The approach to biodiversity offsetting contained within the Local Plan is considered to be in line with national guidance.
10) Sustainable Design and Construction

This section seeks to achieve high quality, inclusive design alongside the highest viable standards of environmental performance in all development.

What did consultees say?

- General support was given to SDC1, including its approach to density of new development and where new housing is proposed next to sensitive sites e.g. waste facilities, although it was also commented on that the wording and expected densities were ambiguous.
- A comment was received in relation to SDC2 about the policy overlapping NE4 and not being able to suitably require retention of landscape character.
- Some support was given to Policy SDC3 and the protection given to heritage assets, however it was also highlighted in other comments that the level of protection is excessive compared to the requirements of the NPPF, and that amendments should be made.
- Some comments made about SDC4 suggested the proposed water and efficiency standards required justification and evidence. Support for the use of Building Regulations as a measure was given in another comment.
- A request was made to include reference to using canals or rivers for heating or cooling purposes.
- Support given for the alterations made to SDC5 since the Preferred Options stage, although some additional measures relating to watercourse protection and flood risk reduction also requested. A request was made to reference the NPPG for site specific flood assessments.
- Support given for SDC6 although request that sustainable urban drainage (SuDS) are located outside of floodplain. Suggestion that SuDS future maintenance is considered by developers.
- In general, respondents have also commented on SDC5, SDC6 and SDC7 in relation to overall concerns about flooding as a result of development in the plan.
- Some comments regarding Policy SDC8 included highlighting the need to avoid adverse impacts and for solar panels to be sited on the roofs of buildings in the first instance. Suggested requirement for solar not be left to BREEAM considerations and that developers should demonstrate why they should not be installed on new buildings. Preference stated to require no non-agricultural land is available first for this type of development. Request also made for clarification on the definition of ‘large scale’ solar development and for positive guidance on non-large scale solar farms.
- There was a concern about the practical implementation of policy SDC9 due to securing agreements with network providers before a grant of planning permission. Impreciseness of
proposed targets was also raised, however generally there was support for the policy. A comment did request that the policy be implemented for all parishioners in an area.

**RBCs response to comments**

- Comments regarding the ambiguity of SDC1 were noted however it is considered the policy is suitable for achieving the objectives of the NPPF and does not require amendments.
- With regard to concerns about SDC2, this policy focusses on the more site specific details of planting and surface treatment, and it is considered the policy as written is satisfactory.
- An updated Water Cycle Study has been carried out which supports the use of the higher building regulations option for water efficiency and it is considered SDC4 is justified. Additional requirements have not been used that are beyond the technical standards.
- Amendments regarding watercourse protection and SuDS will be made to policies SDC5 and SDC6. Some additional details will be provided as part of a Sustainable Design and Construction SPD.
- The use of the term ‘large scale’ in SDC8 is in accordance with the wording given in the NPPF and is considered sufficient as each case can be considered on its merits. It is not considered justified to require solar panels on new buildings as a matter of course, and it may also be possible for developers to demonstrate alternatives when demonstrating energy efficiency. The wording of the policy was otherwise considered to be sufficiently in accordance with the NPPF, and other policies are also in place for protection of visual and residential amenities.
- It was not considered necessary to amend SDC9, although in relation to concerns about the practical implementation of the policy, it was considered suitable to include the matter of broadband provision in the Infrastructure Delivery Plan.
11) Delivery
This chapter details the necessary infrastructure and delivery requirements of both allocations and windfall developments that may come forward through the life of the Local Plan. It is essential that future development is supported by all forms of sustainable transport.

What did consultees say?
- The Canal and River Trust highlighted that where new development has the likelihood of increasing usage of canal towpaths, it is considered reasonable that the infrastructure needs associated with relevant sites includes contribution to towpath access and maintenance.
- A site promoter at Coton Park East acknowledged support for financial viability being referenced as a consideration in determining planning obligations to make a development acceptable in planning terms. They point out that the same level of flexibility should be included in future Community Infrastructure Levy (CIL) requirements / policies otherwise the funding of non-CIL requirements such as affordable housing could be compromised.
- A consultee stated that infrastructure should be in place before development is occupied, which will not be possible if development is delivered in a piecemeal fashion. Also queried whether CIL monies will be in place to deliver major infrastructure projects, such as the south west link road network.
- A consultee highlighted the role of Planning Obligations in mitigating any impacts arising from development, especially in the event of any shortfalls in public sector funding.
- It was expressed that maximum car parking standards should not apply to residential development.
- Concern expressed that insufficient focus has been paid to the emergency services infrastructure requirement in Paragraphs 1.12-11.17, which could mean less developer contributions for emergency services thus risking undermining emergency services provision.

RBC’s response to comments
- Contributions relating to towpaths would be clarified during the planning application stage of individual allocated sites.
- Rugby Borough Council will look to set the CIL after the adoption of the Local Plan. CIL contributions on affordable housing will be in line with national guidance.
• Appropriate levels of infrastructure will be agreed for individual developments based on the requirements identified. The Infrastructure Delivery Plan (IDP) is a live document and will be subject to updates informed through stakeholder engagement.

• RBC will continue to work closely with Warwickshire County Council Fire and Rescue to confirm the details of the contribution requests.

• Residential car parking standards appended to the Local Plan are guidance figures which do not set a maximum parking standard.

• RBC details emergency services infrastructure provision in the IDP and S106 request can be made to development proposals where justified.
Infrastructure Delivery Plan

- Reference to a fire and rescue facility at the Coton Park East allocation should be removed from the IDP as it is no longer considered necessary.
- Warwickshire Police have updated the requirements for sites including a requirement for Lodge Farm.
- Warwickshire County Council Highways stated that Lodge Farm would also need to contribute to the same strategic infrastructure as South West Rugby such as the South West link road network and access restrictions and/or traffic calming in Dunchurch to deter through-trips and the M45/A45 mitigation.
- The IDP provides no certainty as to when infrastructure will be delivered.
- The IDP is vague with no cost and it is not clear who will pay for the infrastructure.
- Infrastructure should be provided in advance of development.
- The Ashlawn Road appeal site transport mitigations to alleviate Dunchurch crossroads is not included within the IDP.
- The Strategic Transport Assessment (STA) mitigations should be included in full in the IDP.
- UHCW seek the inclusion of Blue Light Access from the University Hospital Coventry Site to the A46 via Walsgraves Hill Farm as detailed in the Draft IDP at March 2016 at Appendix 7 to Coventry City Council’s draft publication Local Plan.

RBC Response

- The IDP will be updated to take account of the responses received by Warwickshire Fire and Rescue, Warwickshire Police and the updated STA.
- The IDP is a live document identifying the strategic requirements to enable the delivery of the allocations contained within the Local Plan only. The costings for infrastructure will be updated accordingly.
APPENDIX 1: Rugby Local Plan 2011 – 2031 Publication Draft (September 2016) – Consultation Comments on Sustainability Appraisal
The purpose of this note is to summarise the consultation responses on the Sustainability Appraisal (SA) Report (September 2016) prepared by LUC on the Publication Draft of the Rugby Local Plan, and to set out LUC’s responses to these comments.

The majority of comments received relate to site allocations in the Publication Draft Local Plan, and reasonable alternative site allocations considered during the Local Plan preparation process. Most challenge the SA scores for sites, and a small number of consultees raise concerns regarding the SA process and how the SA findings were taken into account by Rugby Borough Council when deciding which sites should be included as allocations in the Publication Draft Local Plan, and which should not.

The note provides an initial account of the process undertaken for the SA of the sites considered for inclusion in the Publication Draft Local Plan. It then goes on to provide responses to consultee comments on the SA Report.

There were a large number of consultees who commented on Policy DS10 Lodge Farm. Most of these comments challenged the SA scores in the SA Report for individual SA objectives, and some provided their own information to support their views. Some of the consultee comments were quite long, although similar issues tended to be raised by the various consultees. We have therefore summarised the main matters raised by these consultees for each of the SA objectives and provided responses to them.

In a small number of instances, individual consultee comments have been summarised because they have commented on other sites or matters, or because their comments did not fit easily into the summary of comments by SA objectives.

A number of the consultees comment on the SA process for appraising sites. As context for responding to the comments, the SA process is described below.

It should be noted that an SA of a Local Plan is a strategic assessment. It is not expected to examine each and every site in detail, but to provide sufficient information and analysis in order to identify 'significant effects', both positive and negative at the Local Plan scale. This was achieved using a graded scoring system of pluses and minuses, which is both a common and accepted practice in SAs of Local Plans.

During the course of the SA nearly 200 reasonable site options needed to be assessed (see paras 2.19 to 2.26 of the SA Report). In order to carry out the SA of this number of sites in a consistent way across all sites, a method was developed based on the SA Framework (Table 2.2 of the SA Report). This method is described in paras 2.31 to 2.35 in the SA Report and is consistent with the approach to SA that LUC has used for a number of Local Plans that have achieved adoption.

The site appraisals were carried using data available from national data sources and from data held by Rugby Borough Council. It is common practice in SA to apply assumptions to the use of the available data when assessing large numbers of sites. The SA Report states in para 2.35:

"In order to ensure consistency in the appraisal of the residential and employment site options, detailed sets of assumptions were developed and applied. These assumptions set out clear parameters within which certain SA scores would be given, based on factors such
as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The assumptions are presented in Appendix 4 and were applied through the use of Geographical Information Systems (GIS) data where appropriate.”

1.10 Following on from the original Call for Sites, 142 reasonable residential site options and five reasonable employment site options were identified and subject to SA by LUC. The findings were presented in a summary SA document which was made available to the Rugby Borough Council officers preparing the Local Plan in September 2015. This was a working document intended to inform the plan preparation process rather than a full SA report and was not made publicly available at the time (the findings of that stage of work were later presented in Chapter 4 of the SA Report for the Preferred Option (December 2015)).

1.11 The Council took into account the findings of the SA as well as other relevant factors when deciding which residential and employment sites to include in the Preferred Option and which site options to reject. Appendix 7 in the SA Report for the Preferred Option listed the site options considered and stated whether or not each one was included as a preferred site allocation at that stage, also giving the Council’s reasons for selecting or rejecting each site at that stage.

1.12 A further Call for Sites exercise was held alongside the consultation on the Preferred Option between December 2015 and February 2015, and this led to the Council identifying a further 46 reasonable alternative residential site options. The Council considered all sites that were submitted during the consultation and identified those that it considered to be reasonable options for SA by identifying only those sites that accord with the distribution strategy that was set out in the Preferred Option Local Plan (and which has been subject to SA during the Plan preparation process). On that basis, reasonable alternative sites were taken to be those that were located on the urban edge of Rugby town, that were adjacent to or within main rural settlements or that are within the open countryside/Green Belt and were of sufficient scale to accommodate a new settlement. One new employment site option was also identified through that further Call for Sites exercise.

1.13 The 46 new residential site options and the new employment site option were also subject to SA and the findings were presented in Chapter 4 of the SA Report along with the SA findings for the residential and employment site options appraised previously.

1.14 As stated above, the Council officers used the SA of the sites, alongside the SA of the spatial strategy options, other evidence gathered by the Council, the outcomes of consultation responses on earlier stages of the plan, and their interpretation of national planning policy, to decide which sites should be included in the Publication Draft Local Plan and which should not. Having made the decision which sites should be included in the Publication Draft Local Plan, these were then worked up as detailed policies in the Publication Draft Local Plan which were then subject to a further round of SA. The SA scores and findings of the detailed site policies (i.e. the ‘policy SA’) sometimes differ from the SA of the sites carried out at the earlier stage (i.e. the ‘site SA’), because the policy wording includes mitigation and other criteria setting out how the sites will be developed.

1.15 The audit trail of site options was updated and presented in Appendix 7 of the SA Report. It includes the new site options as well as those considered previously and reflects which site options were selected or rejected by the Council for inclusion in the Publication Draft Local Plan. The reasons for the Council’s recent decision making are also provided in Appendix 7.

• RPS planning & Development on behalf of St Modwen Development Ltd
The consultee summarises their understanding of the SA process at each stage of the site assessment process, and the selection of spatial strategy. The consultee states that “the approach of the Council in considering the spatial options is considered in principle to be a robust and effective one”.

The consultee notes the differences in the scoring of site S16046 Land off A45 Daventry Road, and Policy DS10 Lodge Farm, which was included in the Publication Draft Local Plan. The consultee goes on to provide their own assessment of S16046 Land off A45 Daventry Road, “which is based on a more in depth understanding of the site and evidence base, than was available the Council when preparing the publication draft SA.”

The consultee notes that their assessment "provides a slightly alternative assessment from that contained within the SA, with adjustments being made to the assessment against SA Objectives 6 (Economy); 10 (Waste); and 11 (Climate Change).”

In addition, the consultee notes a “slight inconsistency” in the assessment of Coton Park East (DS7 – page 783) and the assessment for DS10 against Objective 12 (Flood Risk). The consultee is of the view that for consistency purposes they should have the same negligible (0) effect, as both sites are greenfield located outside FZ3a/b, and that, therefore, it may be that the Coton Park assessment is in error and should have scored a minor negative effect.

The consultee concludes by stating that “The Council’s approach to the SA is a logical one and supports the growth options (wider focus/new town) and whilst there are certain areas of the assessment of DS10 which we believe have potentially been under assessed, the overall approach is both robust and transparent and provides a sound basis and assessment for the Local Plan policies.”

LUC notes the consultee’s support for the approach to the SA process.

LUC used a consistent approach throughout for the site appraisals, using a set of SA assumptions presented in Appendix 4 of the SA Report. This enabled each site to be appraised on its own merits, prior to mitigation.

The Council used this information, and its own evidence base and consideration of consultation responses, in order to select sites for inclusion in the Local Plan. These were then given detailed policy wording and it is the wording of the policy that was subject to SA for the Publication Draft.

It is acknowledged that when other parties carry out their assessment of sites and policies, they may come to different views on the likely effects arising and their significance. The differences between the consultee’s assessment of Policy DS10 and that of LUC are minor.

It is further acknowledged that there is a slight inconsistency in the scoring of Policy DS7 and DS10 against SA objective 12 (Flood risk). However, the inconsistency is minor and has no bearing on the significant effects of the Publication Draft Local Plan identified by the SA.

A number of consultees provided similar comments on the proposed allocation of Lodge Farm with reference to the SA objectives used in the SA. The key issues raised in relation to each of the SA objectives are summarised below.

Key issues raised were as follows:

- Concerns relating to lack of public transport within the vicinity (given distance to Rugby town centre and nearest settlements) to access employment, jobs and services and there being no plans for improved provision associated with Policy DS10.
• Concerns in relation to pressure that the new residents of the development will put on existing local services creating disadvantage.
• Concerns that the provision of broadband alone is unlikely to reduce poverty.
• Concerns that new supporting infrastructure i.e. water, electricity, gas will be passed on to the homeowners meaning that housing will not be affordable which will create social exclusion.
• Overall, the policy should not have a positive scoring.

1.28 The SA of Site S16046 recorded a negligible ‘0’ score against SA objective 1 on the basis that the location of new housing will not have a direct effect on this objective.

1.29 The SA of Policy DS10 recorded a minor positive ‘+’ score because the policy specifies that the new housing development will include high quality telecommunications, helping to reduce social exclusion.

1.30 Although not specifically mentioned in the SA, the development at Lodge Farm would also be expected to contribute 30% affordable housing, under Policy H2: Affordable Housing Provision, also addressing social exclusion and disadvantage. The site would also provide a range of local services and facilities, plus public transport connections to surrounding villages, Rugby and Daventry, which should all assist with addressing social exclusion issues.

1.31 It should be noted that the SA is carried out a strategic level, and scorings are based on the policy wording contained with the Local Plan on the assumption that the policies will be implemented as intended. A minor positive ‘+’ score for SA objective 1 is justified.

1.32 Key issues raised were as follows:
• There is insufficient policy support given to justify a significant positive score given that onsite cultural, leisure and social infrastructure provision is not yet known.
• Residents may need to travel more extensively to access a full range of services and facilities, particularly during the early stages of the development, and this could be an issue given the limited local transport services (4 bus journeys per day). Concerns were also raised in relation to poor access to existing schools to serve new population when development is at an early stage.
• The nearest secondary school will be a significant distance away.
• Although there is a policy requirement for public transport links, this requirement is not listed in the Infrastructure Delivery Plan.
• Overall, the policy should not have a significant positive scoring.

1.33 The SA of Site S16046 recorded a minor negative ‘-’ score against SA objective 2 as the site is not located within Rugby town, a Main Rural Settlement or a Local Needs Settlement.

1.34 The SA of Policy DS10 recorded a significant positive ‘++’ score because the policy requires the provision of a local centre, a two form entry primary school, land for a GP surgery, and direct high quality public transport links to surrounding villages, Rugby and Daventry. The objective is to deliver a self-sustaining, Main Rural Settlement – the second highest category of settlement after Rugby itself.

1.35 It is acknowledged that the development will not include a secondary school, but it is considered that the services and facilities that will be provided as part of the development, and the public transport links to larger settlements, are sufficient on balance to justify a
significant positive ‘++’ effect for SA objective 1. It should be noted that under the assumptions used for the site SAs (Table A4.1 in Appendix 4 of the SA Report), sites within a Main Rural Settlement were assumed to have a significant positive ‘++’ effect against SA objective 2. To be consistent with this approach, the development of a new Main Rural Settlement should also be scored significant positive ‘++’.

1.36 Key issues raised were as follows:
- Raised concerns that increased traffic and car journeys, as a result of residents having to travel further afield to access a more extensive range of services and facilities, will negatively affect the Dunchurch intersection AQMA and increase air pollution in surrounding towns and villages, as well as road safety.
- There is insufficient policy support that healthcare facilities will be provided as part of the development to support the minor positive SA effect.
- Raised concerns that an increase in population in the local area as a result of the development will put existing local healthcare facilities under pressure.
- Overall, disagree with the minor positive SA scoring given.

1.37 The SA of Site S16046 recorded a minor negative ‘-’ score against SA objective 3 because the site is not located within walking distance (600m) of either a healthcare facility or an area of open space. In addition, the site is located adjacent to the A45 which is directly linked to an AQMA to the north.

1.38 The SA of Policy DS10 recorded a mixed minor ‘+?/-’ score on SA objective 3. The development site is to provide a comprehensive green infrastructure network which may encourage new residents to engage in active outdoor recreation. Although the site is not located within walking distance (600m) of an existing healthcare facility, the site will include land for a GP surgery in the local centre. However, the site is located adjacent to the A45 which is directly linked to an AQMA to the north. The development could therefore compound the potential health impacts of air pollution in that area.

1.39 It is considered that the matters raised by the consultees are adequately reflected in the SA scoring of ‘+?/-’ for Policy DS10.

1.40 Key issues raised were as follows:
- The supporting infrastructure costs for Lodge Farm will be high resulting in costs being added to house prices which in turn will affect affordability.
- The remoteness of the site will reduce the practicability for unemployed or lower income families to live there due to the lack of public transport and limited access to private transport as well as the additional cost of travel to schools/college/supermarkets/leisure facilities.
- There is no policy support for affordable housing being provided as part of the development.
- Overall, disagree with the significant positive SA effect given.

1.41 The SA of Site S16046 recorded a significant positive score ‘++’ on SA objective 4 because of its large size and therefore likely significant contribution to the overall housing need of the Borough.

1.42 For the same reason, the SA of Policy DS10 recorded a significant positive score ‘++’.
Although not specifically mentioned in the SA, the development at Lodge Farm would also be expected to contribute 30% affordable housing, under Policy H2: Affordable Housing Provision, which would directly assist with the achievement of this SA objective. Policy H1: Informing Housing Mix provides policy guidance on the range and type of homes that need to be delivered through development. A large site, such as the development proposed under Policy DS10, offers considerable scope to achieve these objectives.

Therefore, it is considered that Policy DS10 will make a significant positive ‘++’ contribution to the achievement of this SA objective.

Key issues raised were as follows:
- A large residential development in a rural location such as Lodge Farm is likely to increase crime levels and provide for various types of criminal activity and anti-social behaviour.
- Overall, did not agree with the negligible SA effect given.

The SA of Site S16046 recorded a negligible ‘0’ score against SA objective 5 on the basis that the location of new housing will not have a direct effect on this objective.

The SA of Policy DS10 also recorded a negligible ‘0’ score for the same reason. The effects will depend more on the detailed proposals for the site in terms of design, the incorporation of lighting etc, which will be determined at the detailed planning stage.

It is not considered that there is sufficient evidence to justify a change to the SA score for this SA objective.

Key issues raised were as follows:
- Disagree that local transport links will provide residents with adequate access to surrounding villages in order to stimulate the local economy given that the provision of supporting transport infrastructure is unknown.
- The out of town location will encourage residents to use out of town shopping facilities rather than supporting local trade. Location of development may even result in residents travelling to employment opportunities and services within Daventry and Coventry instead of Rugby.
- There is a lack of employment sites proposed within the development, or located nearby, for future residents, especially those without access to cars, to support. There is no requirement for any public transport links to employment opportunities at DIRFT, Coventry, Southam, Warwick, Leamington, Gaydon, Northampton or further afield.
- Overall, disagree with the minor positive SA effect given.

The SA of Site S16046 recorded a minor positive ‘+’ score against SA objective 6 because the site is located directly adjacent to two bus stops on Daventry Road, although it was acknowledged that the site is not located within walking distance (600m) of an existing employment site, Rugby town centre or the centre of a Main Rural Settlement.

The SA of Policy DS10 also recorded a minor positive ‘+’ score. The site is already located directly adjacent to two existing bus stops on Daventry Road and further public transport infrastructure is to be provided as part of the development of the site to improve direct links to the surrounding villages, Rugby and Daventry. This will ensure that residents are able to access employment opportunities elsewhere, including people without a car. However, the site is not located within walking distance (600m) of an existing employment site and the site has not been allocated to provide additional employment land. Therefore,
on balance, it was considered that a minor positive effect should be recorded on this SA objective overall.

1.52 It is agreed that there is no provision for large-scale employment development in Policy DS10, and as a result some residents will commute to other locations to access employment opportunities. As it will become a Main Rural Settlement, it will provide employment opportunities in the services and facilities located on site and there are likely to be opportunities for small business, trades people and homeworkers to work from the new development, supported by the provision of high quality telecommunications infrastructure. It will also provide construction employment, and associated services and materials, over a long period of time while the settlement is being developed, further helping to support the economy of the Borough.

1.53 If the development had included designated employment land, and been of a larger scale to encourage close living/working relationships, it would have scored a significant positive ‘++’ for this SA objective. Because it doesn’t but will still provide small scale local employment it scores a minor positive ‘+’. This is considered to be a reasonable and justified score.

1.54 Key issues raised were as follows:
- Raised concerns that traffic congestion issues travelling into Rugby town centre as a result of the new development will discourage residents from visiting. Rather residents will choose Daventry and Coventry for accessing services, shops and employment. This is also likely given the site’s proximity to the A45, resulting in the town losing out on revenue and trade to other towns.
- Generally do not agree with the negligible SA score, but rather believe this to be negative.

1.55 The SA of Site S16046 recorded a negligible ‘0’ score against SA objective 7 on the basis that the location of new housing will not have a direct effect on this objective.

1.56 The SA of Policy DS10 also recorded a negligible ‘0’ score for the same reason.

1.57 The decision-making criteria for this SA objective are primarily intended for appraising development proposals within the town centre, and therefore the SA score of ‘0’ remains appropriate for developments that are outside the town centre.

1.58 Key issues raised were as follows:
- The remote location of the site would not promote urban generation given that residents would meet their needs at more accessible out-of-town centres.
- Concern is raised that this site would result in the loss of greenfield land rather than the regeneration of brownfield sites.

1.59 The SA of Site S16046 recorded a minor negative ‘-’ score against SA objective 8 as it would require the development of greenfield land.

1.60 The SA of Policy DS10 also recorded a minor negative ‘-’ score for the same reason.

1.61 The SA scores are consistent with the assumptions used in Table A4.1 of the SA Report – the development of a greenfield site should receive a minor negative ‘-’ score. If the site had been mainly or entirely brownfield land it would have received a significant positive ‘++’ score. There is nothing that Policy DS10 can do to change the fact that it will be a greenfield as opposed to brownfield development.
Key issues raised were as follows:

- Concerned that the location of the site will lead to significant loss of greenfield land rather than the development of brownfield sites which will lead to the demand and consumption of raw materials for construction.
- Energy efficiency measures are not discussed in sufficient detail in the policy to allow a robust judgement to be made.
- Raised concerns that there is an insufficient evidence base on which to base a judgement i.e. no agricultural classification report is available.

The SA of Site S16046 recorded an uncertain significant negative ‘--?’ score against SA objective 9 because it is classified as Grade 3 agricultural quality, and therefore development here may have a significant negative effect although this was uncertain depending on whether the site is within Grade 3a or 3b land which is unknown.

The SA of Policy DS10 recorded an uncertain significant negative ‘- -?’ score, mixed with a minor positive ‘+’ score. The uncertain significant negative ‘- -?’ score was again given because development of the site could result in the permanent loss of best and most versatile agricultural land. The minor positive score was recorded because the policy specifies the development proposals for the site must include an assessment of the energy requirements of the proposed development and measures to minimise energy use and include renewable energy generation.

The scores in the SA are largely consistent with the views of the consultees.

Key issues raised were as follows:

- Disagree with the minor negative scoring given that the site is on greenfield land and will require large volumes of raw materials for construction. Believe a significant negative effect is more realistic.
- Concerns that the development will generate significant amounts of residual waste, the management of which is not detailed within the policy.

The SA of Site S16046 recorded a negligible ‘0’ score against SA objective 10 because it would have no effect on the recycling of land and materials.

The SA of Policy DS10 recorded a minor negative ‘-’ score because the policy allocates land for the development of 1,500 new homes and is therefore expected to result in an increase in local waste production. In addition the site is on greenfield land and would therefore result in fewer opportunities for the re-use of existing materials or buildings which are more likely to be present at brownfield locations.

The minor negative ‘-’ score remains valid.

Key issues raised were as follows:

- Concerns that residents will need to travel by car to access employment and services (resulting in increased greenhouse gas emissions) given the rural location of the site, the existing lack of public transport links serving the site, insufficient details of improvements to public transport and due to the likelihood that the services being provided at the site will be insufficient to meet local needs.
- Do not agree that the provision of a new cycle network will encourage the uptake of more sustainable transport modes (resulting in less greenhouse gas emissions) unless it
links the site with other settlements and employment areas whereby residents can access employment and services.

- General agreement that there is a lack of evidence that the site will be able to function as a Main Rural Settlement given that details of onsite services are insufficient within the policy.
- General agreement that the policy should be scored negatively against this SA objective.

1.71 The SA of Site S16046 recorded an overall negligible ‘0’ score against SA objective 11 because although the site is located directly adjacent to two bus stops on Daventry Road, it is not located within walking distance (600m) of an existing employment site, Rugby town centre or the centre of a Main Rural Settlement.

1.72 The SA of Policy DS10 recorded a minor positive '+' score. This score was given because the site is located directly adjacent to two existing bus stops on Daventry Road and the development is also to provide improved public transport links as well as a new cycle network. This may encourage people to undertake journeys by more sustainable modes of transport which would help to reduce the greenhouse gas emissions associated with car use. In addition, the development is to include a range of community services and facilities which will help it to operate as a relatively self-contained Main Rural Settlement, reducing the need for people to travel day to day. However, the SA noted that the development does not allocate employment land and therefore residents may need to travel outside the settlement to access employment opportunities. On balance, a minor positive ‘+’ score rather than a significant positive effect was considered justified.

1.73 In addition to the justification given in the SA Report, Policy DS10 requires that an assessment of the energy requirements of the proposed development and measures to minimise energy use and include renewable energy generation. Designing a new settlement provides an opportunity to take climate change mitigation into account from the very beginning, which isn’t possible with established settlements that have developed over time before climate change was considered to be an issue. However, the scale of the proposed new settlement means that it will not be able to accommodate a full range of services and facilities associated with a larger town, and the lack of employment land allocations, mean that there will be travel by car elsewhere, and therefore it is considered that a minor positive ‘+’ rather than a significant positive ‘++’ score is still justified.

1.74 Key issues raised were as follows:

- Concerns that the site is within an area that is regularly flooded by the rivers Rainsbrook and Leam, and the Willoughby Brook, and that introducing impermeable surfaces will exacerbate the problem.
- Concerns that there is currently insufficient evidence that the site is not impacted by flooding i.e. by means of a Flood Risk Assessment.
- General concern that there are no measures proposed in the policy to manage flooding as a result of the development.
- General agreement that the policy should be scored as a significant negative for this objective.

1.75 The SA of Site S16046 recorded a minor negative ‘−’ score against SA objective 12 because, although the site is located outside of flood zones 3a and 3b, it would introduce impermeable surfaces and therefore increase surface run-off.

1.76 The SA of Policy DS10 recorded an uncertain minor negative ‘−?’ score because the development site is located outside of flood zones 3a and 3b but is on greenfield land and
therefore the loss of permeable surfaces could reduce rates of infiltration and increase runoff. Uncertainty was introduced because the new development at this location is to provide for a comprehensive green infrastructure network meaning that areas of permeable surfaces would be retained within the development, and because other mitigation may be able to be incorporated through the use of sustainable drainage systems (SuDS).

1.77 A number of the consultees suggest that there is a history of flooding in the area. However, the Strategic Flood Risk Assessment (URS, September 2013) shows that the proposed development site under Policy DS10 is not in Flood Risk Zones, 2, 3a or 3b, and the SA has taken this into account in the score. The site is greenfield land, and therefore there is a risk of increased run-off, which is reflected in the uncertain minor negative ‘-?’ score.

1.78 Key issues raised were as follows:

- Concerns raised over the use of the findings of the Rugby Borough Council historic environment site assessment process in the SA given that the exact archaeological conditions of the site are currently unknown.
- Information was put forward to suggest that the evidence base regarding the landscape and heritage value of sites included in the plan are either substantially out of date or omit the area in which DS10 is located altogether and that the historic attributes of the area where Lodge Farm would be developed is of national importance.
- General agreement that a modern village such as Lodge Farm will not be in keeping with other nearby historical villages and their settings.
- Concern that the site will destroy existing farmsteads.
- Disagree that the site will help to enhance the setting of nearby heritage assets.

1.79 The SA of Site S16046 recorded an uncertain negligible ‘0?’ score against SA objective 13. The likely impacts of the residential site options were assessed by Rugby Borough Council as part of the site assessment process, with sites being classed as either red, amber or green in terms of their potential for effects on the historic environment. This site was classed as green because it was considered that there would be no potential impact on the historic environment – in SA terms this translated into a negligible effect on this SA objective although this was also recorded as uncertain as the effects will depend on factors such as the design of the development and it may be possible to incorporate mitigation measures.

1.80 The SA of Policy DS10 also recorded an uncertain negligible ‘0?’ score for the same reasons, although it was noted the policy requires that new development at the site is to be of a high quality design which may help to mitigate any potential negative effects on the setting of any nearby heritage features.

1.55 Key issues raised were as follows:

- Concerns raised that the Strategic Transport Assessment (STA) only extends to Rugby Town, and a limited number of villages, and fails to make any assessment of the traffic impact from the proposed development site.
- Disagree that there is insufficient details given in policy DS10 with regards to the provision of “high quality public transport networks” as part of the development to warrant a significant positive effect in the SA.
- Concerns raised that the existing local public transport links (2 bus stops) and proposed cycle network will not improve access for residents to other employment opportunities and services within the wider area meaning residents will have to rely on private car.
Concerns raised regarding safety when travelling on A45 should private car use increase.

1.81 The SA of Site S16046 recorded a minor positive ‘+’ score against SA objective 14 on the basis that the site is located directly adjacent to two bus stops on Daventry Road.

1.82 The SA of Policy DS10 recorded a significant positive ‘++’ score because, in addition to the site being located directly adjacent to two existing bus stops on Daventry Road, the policy also requires that the site be developed to provide for a comprehensive cycle network across the settlement as well as high quality public transport links to connect with the surrounding villages, Daventry and Rugby.

1.83 The significant positive ‘++’ score Policy DS10 for SA objective 14 is consistent with the assumptions applied in Table A4.1 of the SA Report, given the existing public transport connections and the requirement for high quality public transport links between the site and surrounding villages, Rugby and Daventry, and a comprehensive cycle network across the settlement. The development of a new settlement provides opportunities to ‘design-in’ more sustainable transport modes, which is the subject of this SA objective. It is acknowledged that the scale of the proposed new settlement means that it will not be able to accommodate a full range of services and facilities associated with a larger town, and the lack of employment land allocations, and that there will be travel by car elsewhere.

1.84 Key issues raised were as follows:

- General agreement that the detail in policy DS10 is not enough to conclude that proposed transport improvements could help to reduce the potential for detrimental impacts on local air quality.
- Concerns raised that increased car use could negatively affect air pollution levels within Dunchurch AQMA, particularly given that the Transport Assessment states that pollutant levels are above European limits.
- Generally agree that the SA score for this policy should be significant negative.

1.85 The SA of Site S16046 recorded a significant negative ‘- -’ score against SA objective 15 on the basis that the site is located adjacent to the A45 which is directly linked to an AQMA to the north.

1.86 The SA of Policy DS10 recorded a minor negative ‘-’ score. It was acknowledged that the development of 1,500 new homes could result in an increase in air pollution from vehicles, which could be a particular issue given that the site is located adjacent to the A45 which is directly linked to an AQMA to the north. However, the policy would provide for sustainable transport improvements which could help to reduce the potential for detrimental impacts on local air quality.

1.87 On balance a minor negative ‘-’ score is considered appropriate.

1.88 Key issues raised were as follows:

- Raised concerns over the error in the SA score given – should be a minor negative uncertain effect (-?) rather than a mixed effect (-?/+).
- Concerns raised that the evidence base is insufficient to allow a proper judgement of effects on biodiversity to be made. It was proposed that many of the species require extensive inter-related territories to thrive and that without evidence of the inter-relationship of the habitats it can only be concluded that this proposed development would have a very severe impact upon the entire upper Leam Valley.
• Disagreement that it will be possible to generate ecological improvements given that
greenfield land will be lost and believe the net effect will be negative.
• Generally agree that a significant negative score should be given for Policy DS10 in
relation to this SA objective.

1.89 The SA of Site S16046 recorded an uncertain significant negative ‘- -?’ score against SA
objective 16 because there are a number of potential Local Wildlife Sites located within
close proximity of the site. Woolscote Lodge Fields is located within the southern half of
the site\(^2\), Fields near Magpie Hall is located 157m from the site and the dismantled railway
is located 700m east of the site. The effect was recorded as uncertain as appropriate
mitigation may avoid adverse effects and may even result in beneficial effects.

1.90 The SA of Policy DS10 recorded an uncertain significant negative ‘- -?’ score, mixed with a
minor positive ‘+’ score. The uncertain negative score was because of the proximity of the
potential Local Wildlife Sites described above. However, the policy requires that green
infrastructure is provided as part of the development and also requires that existing
habitats are utilised as a part of this network of green infrastructure, which justified the
addition of a minor positive score.

1.91 With respect to the error identified by the consultees, it should be noted that the symbol
scores (i.e. ‘- -?/+’) are correct, both in the detailed appraisal of Policy DS10 in Appendix 9
of the SA Report, and in all the summary tables in the main SA Report. The justification
text states that "there are a number of potential Local Wildlife Sites located within close
proximity of the site: Woolscote Lodge Fields is located within the southern half of the site,
Fields near Magpie Hall is located 160m from the site and the dismantled railway is located
700m east of the site. It may be possible as part of the design of the new development to
mitigate detrimental impacts on these nearby features. The policy requires that green
infrastructure is provided as part of the development and also requires that existing
habitats are utilised as a part of this network of green infrastructure. As such, an overall
minor negative effect is identified although this is uncertain until the detailed proposals for
the site are known". The final sentence in the summary table in Appendix 9 is incorrect – it
should have stated "A mixed (uncertain significant negative and minor positive) effect is
therefore likely overall”.

1.92 The SA identified the potential for significant negative effects on this SA objective, as well
as the opportunities provided by the Green infrastructure Network. As a result it is
considered that the SA score ‘- -?/+’ is justified.

1.93 Key issues raised were as follows:
• General consensus is that the development is not suited to the open landscape on which
it is proposed.
• Disagree that design measures would be able to screen the development/mitigate
effects on the surrounding landscape.
• General agreement that the minor negative SA score should be significant negative.

1.94 The SA of Site S16046 recorded an uncertain minor negative ‘-?’ score against SA objective
17 because the site lies within the ‘Feldon - Vale Farmlands’ landscape character type, as
identified in the 2006 Landscape Assessment of the Borough of Rugby. This is classed as
being of moderate sensitivity, therefore it was considered that residential development at
this site could have a minor negative effect on this SA objective although this was recorded

\(^2\) Note: Woolscote Lodge Hills potential LWS has been destroyed because the area has been planted with
Aspen. Rugby Borough Council. Pers comm 08/02/2017
as uncertain as the effects would depend to some extent on the design of the development and the incorporation of mitigation measures such as screening.

1.95 The SA of Policy DS10 also recorded an uncertain minor negative ‘-?’ score for the same reasons. The SA recognised that it may be possible to mitigate impacts through high quality design, and the policy requires that site boundaries are designed as to mitigate visual impact particularly upon the surrounding open countryside.

1.96 The site is not the subject of specific landscape designations and was assessed as being of moderate sensitivity, and, given the requirement for landscaping to mitigate its visual impact, an uncertain minor negative ‘-?’ score remains justified.

1.97 Key issues raised were as follows:

- The development will not lead to the enhancement and improvement of townscapes given that it is in a rural location. Concern is raised that the spread of housing into the countryside will damage townscape character given that derelict town buildings etc will not be prioritised for development.

1.98 The SA of Site S16046 recorded a negligible ‘0’ score against SA objective 18 on the basis that, as greenfield land not linked to a town centre, it will not have a direct effect on this objective.

1.99 The SA of Policy DS10 also recorded a negligible ‘0’ score for the same reason.

- Gladman Developments Ltd

1.100 The consultee states that the Council should ensure that the results of the SA process clearly justify its policy choices, and why some policy options have been progressed and others rejected. The consultee states that the undertaking of a comparative and equal assessment of each reasonable alternative and that the Council’s decision making and scoring should be robust, justified and transparent.

1.101 The consultee raises concerns about the consistency of approach taken by the Council with regard to the assessment of sites undertaken in the most recent iteration of the SA prepared by LUC and published in September 2016. The consultee raises the concern that the SA was used to justify a policy decision that has already been made, not as a genuine assessment to inform decision making, and the potential to retrofit an SA to a plan is a serious flaw.

1.102 The consultee puts forward a table that, for 4 of the 18 SA objectives, compares how the SA appraises the GDL promoted site in Wolvey against the draft allocated site at Wolvey Campus in Wolvey Heath. The consultee provides their own assessment against the four SA objectives in order to show the GDL promoted site performs better outperforms the other options.

1.103 The consultee requests the SA for the sites in Wolvey to be revisited.

1.104 The process used to carry out the SA of sites is described under paras 1.7 and 1.15 above. Therefore, throughout the SA process, LUC used the same method and assumptions to appraise all sites so that each site was appraised consistently. The final choice of sites by
the Council to be included in the Publication Draft was that of the Council. The SA was not undertaken retrospectively to justify which sites to include in the Publication Draft, but was used to inform the selection of sites. However, in deciding which sites to include, the Council has taken other factors into account, such as its interpretation of national planning policy, other evidence studies, and the results of consultation at each stage of plan preparation process. The reasons for the Council's decisions are clearly listed in Appendix 7.

- Oxalis Planning on behalf of Roxhill Developments Ltd

1.105 The consultee has an interest in achieving the allocation of land for mixed-use development at land surrounding Walsgrave Hill Farm (Site S14/075), and makes comparisons between the performance of this site and Lodge Farm (Site S16046).

1.106 The consultee states that the SA is not consistent or objective in its judgements of the proposed allocation at Lodge Farm in Policy DS10, particularly in comparison with the judgements made of the site as reference S16046, and the Walsgrave site as reference S14/075. As a result the consultee is of the view that the judgement reads as a wholly subjective and unbalanced post decision justification.

1.107 The consultee notes that the assessment of the Lodge Farm site (ref. S16046) scores the site as less sustainable when compared with the Walsgrave site (ref. S14/075). In particular, the Walsgrave site scores more favourably in terms of health, economic growth, climate change and pollution. However, when the Lodge Farm site is re-assessed as Policy DS10, which includes the proposed mitigation measures outlined for the scheme, the site scores more sustainably than the Walsgrave site.

1.108 The consultee notes that the assessment of Policy DS10 improves the score significantly in respect of the provision of services and facilities, health, economic growth, climate change, sustainable transport and pollution. The consultee concludes that a comparative assessment of the Walsgrave site would likewise see similar improvements to the SA score. The consultee maintains that, as this comparative assessment has not been provided, it is considered that the evidence base to support Publication Draft, in terms of the SA, is not robust or credible as there is no clear comparative assessment of the ‘reasonable alternatives’ in line with the NPPF.

1.109 The consultee goes on to state that they consider that the judgements made in respect of climate change and sustainable transport for Policy DS10 are plainly wrong and clearly not based on an objective assessment of the evidence. They are not consistent with the rest of the SA, particularly given the site’s location and lack of employment land provision.

1.110 The two sites S14/075 Land surrounding Walsgrave Hill Farm, and Site S16046 Land off Daventry Road were both assessed using the same SA objectives and SA assumptions (see Appendix 3 of the SA Report), as reported in Chapter 4 of the SA with the appraisal matrices presented in Appendix 5 of the SA Report. In this respect they are entirely consistent in their approach.

1.111 When comparing the appraisal of the two sites, many of the scores against the SA objectives were the same or similar. The main differences are listed below:

- **SA objective 6:** Promote a strong, stable and sustainable local economy, Site S14/075 scored ‘+++’ whereas Site S16046 scored ‘+’.
- **SA objective 11:** Reduce the Borough’s contribution to climate change, Site S14/075 scored ‘+’ whereas Site S16046 scored ‘0’.
- **SA objective 13:** Conserve and enhance the historic environment, heritage assets and their settings, Site S14/075 scored ‘--’ whereas Site S16046 scored ‘0?’.
1.112 These site assessments, along with the large number of other site assessments, were used by the Council to inform their selection of sites to be allocated in the Local Plan, alongside other evidence and consideration of consultation responses. The Council’s reasons for including or excluding sites in the Publication Draft of the Local Plan are provided in Appendix 7 of the SA Report.

1.113 On this basis, the Council decided to include Site S16046 in the Publication Draft, and this was worked up in more detail as Policy DS10 Lodge Farm, which was then subject to more detailed appraisal as the preferred policy - the more positive scores for some of the SA objectives compared to the original appraisal of Site S16046 reflect the policy wording for the allocation.

1.114 It is fair to say that many sites would perform better against SA objectives if they were subject to individual policy treatment, but it is not reasonable or practicable to expect the Council to prepare policy wording for every reasonable alternative given the number of alternative sites for development that were considered by the Council and subject to SA. The purpose of the site appraisal at the earlier stage is to enable the Council to take an informed view alongside other evidence, national planning policy and consultation responses about which sites to include in the Local Plan and therefore to be worked up as specific allocation policies.

1.115 The consultee resubmitted a consultation response with respect to the Preferred options Consultation December 2015. The consultee objects to the inclusion of Coton House on the basis that the proposed allocation is unsustainable and the Local plan is therefore unsound.

1.116 The consultee rejects completely the SA which it states fails to take proper account of the facts. The consultee specifically challenges the findings of the SA with respect to site SA14/073 Land at Coton House, Rugby (Small Area).

1.117 In summary, the consultee states that:

- The location is not “within the periphery of Rugby” but in the open countryside beyond the M6 and beyond the town, and that there are no local services whatever, and no leisure or cultural opportunities anywhere accessible (SA objective 2).
- It is likely to become a middle class enclave such that anyone who could qualify for affordable housing could not afford to live there (SA objective 4).
- The proposal is likely to encourage ‘motorway’ crime (SA objective 5).
- The fact that there are two bus stops on the southern side of the motorway is irrelevant as there is no safe access between them and Coton House which lies to the north of the motorway (SA objective 6) and that it will become a car borne development (SA objective 14).
- It will have a negative effect on the viability and vitality of the town centre as residents would use out-of-town retail outlets that are closer to access to the town centre (SA objective 7).
- The fact that the site is on greenfield is irrelevant with respect to waste and that a very large negative effect is likely due to the likely future demand for very large volumes of imported inert waste to form screening bunds to protect against the M6 (SA objective 10).
- The minor negative score against Grade II* Listed Coton House and Grade II Listed former stables is inadequate as it would materially alter the open parkland setting and cause significant harm to the significance of the heritage assets (SA objective 13).
The site is not within or characteristic of the ‘High Cross Plateau – Open Plateau’ type of landscape (SA objective 17).

1.118 The site was appraised in accordance with the assumptions presented in Appendix 4 of the SA Report. These assumptions enabled a consistent approach to be adopted for all the site appraisals.

1.119 With respect to the comments raised by the consultee, it is recognised that the M6 separates the site from the remainder of the town of Rugby, and that it is therefore arguable whether the development is within the periphery of Rugby or not (SA objective 2). The SA took the view that the site can be considered to be closely related to the town of Rugby, the urban area of which extends up to the southern boundary of the M6 and was scored accordingly. It is acknowledged that a different view could be taken if the M6 is considered to be the northern limit to the town. However, a precedent for housing development in this location has already been set through an existing consent, and the proposed development will provide an extension to the consented development.

1.120 The remainder of the SA objectives for this site were given scores that are consistent with the assumptions set out in Appendix 4 of the SA Report, using the evidence base that was available for undertaking the SA (e.g. with respect to access to public transport, impacts on heritage assets, landscape sensitivity, etc).

1.121 It is acknowledged that different judgements of how sites should be scored against the SA objectives can be made, particularly by those with detailed local knowledge of the sites in question. The purpose of the assumptions is to ensure that all sites are appraised on a consistent basis in the SA across a large number of sites.

Richard Allanach

1.122 The consultee states that an alternative DS8 policy which omits Ashlawn Fields has not been seriously considered by Rugby Borough Council.

1.123 The consultee gives the view that, whilst the Sustainability Appraisal Report may well form part of the evidence published to justify the Local Plan it did not form part of the evidence base which informed the Local Plan. The consultee states that the first draft of the Sustainability Appraisal Report was not available until 15 September 2016 and the Publication Draft of the Local Plan was available at the Rugby Town East consultation event on 22 September 2016, and therefore “it strains credulity too much to imagine that in the seven days between these two events that Rugby Borough Council was able to absorb all 863 pages of the Sustainability Appraisal Report and incorporate them into their Local Plan.”

1.124 The consultee maintains that the reverse sequence of events must have taken place as is clear from the papers considered by Rugby Borough Council at its meeting of 19 July 2016 when it was reported that “The Sustainability Appraisal of the Publication Draft will be undertaken following the Full Council meeting when it can be confirmed that proposals within it have the support of Full Council” (p4) [the consultee’s emphasis]. The consultee concludes that “In other words the sustainability appraisal was to support the Publication Draft and not to inform it”.

1.125 The remainder of the consultee’s response challenges the Council’s reasons for selecting or rejecting sites, summarised within Table A7.1 of the SA Report.

1.126 The SA is an iterative process that has informed the preparation of the Rugby Local Plan from its outset, as described in paras 2.10 to 2.27 of the SA Report. This has included the
1.127 Throughout this process, LUC has worked closely with Rugby Borough Council planning officers, carrying out site and policy appraisals in order to enable them to prepare, firstly the Preferred Options Local Plan (December 2015), and then the Publication Draft Local Plan (September 2016).

1.128 The final SA Report (September 2016) brought all of this information together in time to be published for consultation alongside the Publication Draft Local Plan in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The SA Report (incorporating 'Environmental Report') is required under Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations') to identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme. This is achieved by the SA Report (September 2016).

1.129 Under Regulation 16(4) of the SEA Regulations, the responsible authority (i.e. the local planning authority - in this case, Rugby Borough Council) is required upon adoption of the Local Plan to provide a statement of (amongst other matters) how environmental considerations have been integrated into the plan, and how the environmental report has been taken into account, and the reasons for choosing the plan or programme as adopted in the light of the reasonable alternatives dealt with. The adoption stage will follow the Examination, assuming that the Inspector finds the Local Plan to be sound.

1.130 The carrying out of the SA of the Rugby Local Plan has been in accordance with the above procedures.

- SARD

1.131 Summary of key issues raised by SARD were that LUC’s sustainability appraisal is flawed in at least five areas:

- LUC have awarded this site a ‘++’ rating for providing affordable and decent housing (2016, p229). They appeared to have reached this ranking solely by considering the size of the plot. No mention is made of SARD’s evidence on this matter, including the infrastructure costs, the lack of a feasibility study, and the views of commercial developers. The site is so costly to develop that no provision for affordable housing can be made in a substandard proposal, and therefore the consultee questions how can the site can possibly be rated ++ for affordable housing?

- LUC have given the site a ‘-‘ rating for urban regeneration (2016, p230). SARD argues that this is too generous. They support the evidence submitted by Daventry District Council to the Publication Draft (James, 2016). Inclusion for development of substantial allocations of greenfield sites in the Local Plan is likely to slow the regeneration of the Rugby Radio Masts site and therefore this site merits a -- rating on this dimension.

- LUC have said that this site will have no effect on climate change (2016, p230). SARD disagrees – the current major employment sites lie to the north of Rugby (and the proposed employment site in South West Rugby is on the far side of the area), the site is not within easy walking distance of Rugby’s old retail centre and beyond the reach of its new retail centre in Elliotts Field. Whilst the site is adjacent to a major convenience retailer, Sainsbury’s, the proposed location of the primary school in the draft masterplan blocks pedestrian access to that site with the likely consequence that even for grocery shopping many of the residents of the site would take to their cars (Rugby Borough Council, 2016c, p23).
LUC have given the site a ++ rating for sustainable transport based on the site being within walking distance of 20 bus stops (2016, p230). SARD argues that this is a perverse methodology. A sustainable transport rating should be based on access to railways (limited), light rail systems (none), the frequency of bus services (very infrequent in southern Rugby) and walking and cycling routes. No agreement between Warwickshire County Council and Stagecoach on how buses would be able to reach this site has been reached on this issue. The ++ rating is over generous.

LUC have given the site a ‘-?’ rating for impact on biodiversity but then qualified that rating with a question mark saying that it is "not yet known what undesignated biodiversity assets may exist within or near to this site” (2016, p231). Nothing could better illustrate LUC’s failure to conduct a proper sustainability appraisal than that remark. The truth of the matter is that the biodiversity assets of the site have been assessed by professionals, RSK Environment, the results have been published and reviewed by the county ecologist and the county ecologist has concluded that the known development scheme for this site would have a negative impact on biodiversity (Marrons, 2014 and Mapstone, 2014). The question mark should be removed from the assessment. These facts are well known to Rugby Borough Council and if they had conducted a proper quality assessment of LUC’s work they would have identified this failing.

SARD is aware of these particular shortcomings in LUC’s assessment because of its close involvement with this particular site over the last three years. It is possible that these shortcomings may be more general and affect the overall conclusions LUC has reached.

The consultee draws attention to the SA of Site S14/025 Land at Ashlawn Road West, Ashlawn Road that was carried out along with all the other sites that were being given consideration as reasonable alternatives in the Local Plan. This site assessment was an initial high level assessment using the assumptions set on Table A4.1 of the SA Report, in the same way that all other sites were assessed. As explained in the methodology, the use of assumptions to appraise large numbers of sites is a common and accepted approach for a strategic assessment such as SA.

The Council decided to allocate Site 14/025 as a component part of Policy DS8 South West Rugby, which was then subject to SA as a whole on the basis of the policy wording. The Council decided it was necessary to allocate the site as part of Policy DS8 because “the site forms part of a wider broad location considered most deliverable in transport terms. Allocation of all land ownerships in the south west presents an important opportunity to masterplan the development of the entire area, ensuring the infrastructure requirements are properly identified and appropriately phased” (see Appendix 7 of the SA Report). Therefore, once this decision had been made, the development of Site S14/025 for the purposes of SA needed to be set within the context of the development of Policy DS8 as a whole.

It is acknowledged that the delivery of Policy DS8 will require significant investment in infrastructure. However, it is of a scale that would normally be expected to deliver a substantial proportion of affordable housing, in accordance with Policy H2: Affordable Housing Provision of the Publication Draft Local Plan. We are of the view that a significant positive ‘++’ score for SA objective 4: Provide affordable and decent housing, remains justified.

The SA acknowledges that, as a greenfield site, Policy DS8 may have a minor negative ‘-‘ effect on SA objective 8: Promote the regeneration of urban areas. This is consistent with the assumptions in Table A4.1 of the SA Report. The Rugby Radio Station site has already been granted planning consent and is under construction, and the Local Plan states that the Council anticipates delivery of the Rugby Radio Station and South West Rugby in particular will continue into the next plan period, which suggests that over time they will
complement rather than compete with another. As a result, we do not think a significant negative ‘- -’ score is justified.

1.136 The SA gave a significant positive ‘++’ score for SA objective 11: Reduce the Borough's contribution to climate change. This was because of a combination of factors, influenced by the scale of development. There are several existing bus stops within 600m north, east, south-east and south of this site and the policy makes provision for new and improved sustainable transport links to be incorporated into the site. Dunchurch Trading Estate is directly adjacent to the west of this site and Dunchurch, which is a Main Rural Settlement (as identified in the Rugby Borough Council Rural Sustainability Study), is adjacent to the site to the south-east. In addition the policy provides for both employment land and new homes onsite as well as improved cycle links within the site and public transport links to Rugby town centre, and new services and facilities. As such residents may be required to travel by private car to a lesser extent which could help to reduce the associated greenhouse gas emissions. The policy also requires an assessment of the energy requirements of the proposed development and measures to minimise energy use and include renewable energy generation. Taking all these factors into account a significant positive effect ‘++’ is still justified.

1.137 The SA gave a significant positive ‘++’ score for SA objective 14: Promote a sustainable and accessible transport network. This was for similar reasons as for SA objective 11 and, for similar reasons, it is considered that the score remains justified.

1.138 The SA gave an uncertain significant negative ‘- -?’ score for Policy DS8 against SA objective 16: Conserve and where possible enhance the Borough's biodiversity, flora and fauna. This was because Cawston Spinney Local Wildlife Site and Cawston Fox Covert Local Wildlife Site are both within the boundary of this site and could be affected by development. In addition, Rugby-Leamington Disused Railway Local Wildlife Site and Cock Robin Wood Local Nature Reserve are directly adjacent to the western edge of this site.

1.139 The SA stated that it may be possible as part of the design of new development to mitigate detrimental impacts on these features - the policy requires that green infrastructure is provided as part of the development and also requires that existing habitats are utilised as a part of this network of green infrastructure. Specific protection is given through the text of policy for Cawston Spinney adjacent to the site around which a 30m buffer is to be identified.

1.140 The SA acknowledges the potential for a significant negative effect on biodiversity, which mirrors the comments raised by the consultee.

LUC
15th March 2017