

From: Dr Jeremy Stocker

Mr Mike Hayden
Inspector
Rugby Borough Local Plan Examination
c/o Rugby Borough Council
Town Hall
Evreux Way
Rugby
Warks
CV21 2RR

12 December 2017

Dear Mr Hayden,

RUGBY BOROUGH LOCAL PLAN EXAMINATION - REPRESENTATION

MATTER 3 – DEVELOPMENT STRATEGY

Issue 3a: Question h

1. Rugby Council intends to provide 15,396¹ new dwellings during the period 2011-2031, against its own identified housing need of 12,400² - an over-provision of 24%. The NPPF requires councils to allow an additional buffer of either 5% or 20% within a rolling five-year period, but brought forward from within the existing plan total, not in addition to it.³ The Local Plan provides no explanation or justification for this substantial over-provision.

2. As at 31 March 2017 2,577 dwellings had already been completed.⁴ Assuming the same rate of completions⁵, the total as of 31 December 2017 is approximately 2,900 leaving an outstanding requirement of 9,500.

3. Allowing for the 2,900 already completed, the Council wants to find an additional 12,500 sites by 2031. In relation to the outstanding requirement of 9,500, this is an over-provision of 31.5% - 3,000 homes more than the Council's own stated demand. This is *double* the number planned for Lodge Farm (DS10).

Issue 3a: Question g

4. Lodge Farm is to be designated a new Main Rural Settlement. However, it contains no new employment land so it will be a commuter housing estate. It is significant that the Local Plan, as amended, has dropped the description 'self-sustaining'.⁶ Geography dictates that to the extent it

¹ Local Plan Minor Modification LP 54.9

² Local Plan Policy DS1

³ NPPF para 47

⁴ LP 54.9

⁵ 430 per annum

⁶ LP 54.60

will meet actual housing demand, it will predominantly be housing demand from Daventry, not Rugby or Coventry. Daventry Council has not identified such demand and has objected to the Lodge Farm development.

5. The Local Plan has explicitly substituted Lodge Farm for the preferred option site at Walsgrave, to meet part of Coventry's housing needs. Lodge Farm is almost as far from Coventry as it is possible to get within Rugby Borough. From a sustainability point of view, this is unsupportable.

6. Development of Lodge Farm runs directly counter to the Council's own Settlement Hierarchy.⁷ This permits development of countryside only in accordance with (unspecified) national policy. Policy DS10 provides no explanation of why Lodge Farm meets national policy in relation to countryside development.

7. The Local Plan states that "Countryside locations...are generally unsuitable for development ...The only anticipated variations to this approach will be the exceptional delivery of housing to meet a specifically identified housing need...intrinsically appropriate to a countryside setting."⁸ Neither Rugby's nor Coventry's housing needs are intrinsic to a countryside setting.

Plan Modifications

8. None of the Council's proposed Modifications will meet the objections raised above.

9. In order to make the Local Plan sound, Policy DS10 should be removed as a *main modification* and the figures at paragraphs 4.12 to 4.15 adjusted accordingly. This will still permit the development of 13,900 dwellings against a requirement of 12,400, providing a buffer of 1,500 – an extra 12% overall, or 15.8% in terms of the outstanding requirement.

Yours sincerely,

A handwritten signature in black ink, appearing to be a stylized name or set of initials, located below the closing text.

⁷ Local Plan Policy GP2

⁸ Local Plan para 3.14