

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
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Key	
	Added 23.11.17
	Added 6.12.17
	Added from another policy

1452	Public Health Warwickshire	Public Health Warwickshire	NA	D1	Provision for land for healthcare should be twinned with engagement of healthcare providers to manage care for new development. Community ownership of green space by schools or VCS organisations through food growing and gardening schemes. Socialising opportunities should be accessible and community run transport services could be encouraged to run services where the council do not.		WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140.No change to Policies
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1530	Dr Edmund Hunt	NA	NA	D1	<p>Overall I believe there is a lack of transparent information, notably the fact that prospective logistics developments that may support the South West Expansion have not been articulated or mentioned. Objectives - would support Economic objective 4 for no over reliance on logistics DS5 - defines strategic housing areas >100 but Coton House is at 100 yet this site meets very few of the criteria for 100 above even though it is so close to a strategic development (sceptically convenient?!). I appreciate a line has to be drawn but Coton House does little to meet sustainable development objectives and there should be limits to any further development at Coton House to mitigate against it becoming a large scale development with no sustainable benefits. DS8 - With strategic objective to not rely on logistics, there appears contradictions with the proposed Symmetry Park application near Dunchurch. Considerations need to be given to how this development would invest in the local road network to support the entry to South West Rugby and mitigate against Dunchurch travel flow. ED2 - Support this and would request</p>	<p>Ensure transparency of call to action for development sites Be more thorough and committed to how you will ensure the success of Rugby Town Centre It is disappointing that, within your duty to cooperate, I am not aware of you informing adjacent Parish Councils, whose residents use rugby, about the consultation more actively. Also see previous comments.</p>	<p>South West proposed allocation-landowners are able to promote land outside of the Local Plan process. The Local Plan seeks to allocate 110 hectares of employment land based on a number of factors identified within the evidence base such as average rates of past employment land take-up. Employment mix is informed by the Employment studies contained within the evidence base. All sites submitted to the council through the SHLAA call for sites have been considered against the same SHLAA methodology to identify the most suitable, available and achievable, deliverable and developable. Coton House has been subject to an SA. The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. STA has shown that proposed mitigation schemes reduce traffic flows through Dunchurch crossroads compared to the existing levels.</p>

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					<p>the policy goes further to ensure that large scale logistics developments close to the town would be closely considered by RBC. The policy therefore needs to ensure Rugby and its Local Plan have influence on Magna Park and any prospective developments, notably 6.12 and the proximity of employment land to residential areas given the lack of close, viable residential amenity to Magna Park H2 - Do not agreed given the prospective increase in logistics in SW Rugby. Would suggest an increased proportion of affordable housing in particular at any sites close to employment land (e.g. New South West Rugby to accommodate potential logistics expansion for lower income employees) TC3 - not quite clear how this prioritisation of retail allocation will be delivered in reality - the current trend for rugby (and many other) citizens is for out of town convenience, therefore RBC will receive developer interest for large scale retail areas. Should a policy not focus on limiting out of town allocation, in other words, categorised between in town and out of town TC3 - I could not clearly understand how the local</p>		

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					<p>plan is going to commit or ensure improvements are made to the town centre. Surely a call for sites, or at least evidence of a similar process, should be done to transparently identify the town centre long term plan and sustainable future according to NPPF. D1 - some evidence behind to validity / success of Travel Plans and the rationale for including them should be provided as there is very mixed success of them D1 - it appears slightly surprising there is not a specific or clear policy that identifies key strategic routes around Rugby (e.g. A45 / A426) and how these need to be assessed an invested in as the Town grows significantly in the coming years. There is little emphasis on driving new technologies or lower carbon emission transport infrastructure to support a cleaner, quieter, safer town centre and surrounding traffic routes.</p>		

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1687	Linda Tomalin	NA	NA	D1	Quiet, safe roads are essential to encourage cycling. No matter how much cycle parking provision is created, it will not encourage people to cycle if the roads are busy and dangerous. The amount of development in the Local Plan will create busier roads definitely discourage people to use their bicycles as a means of transport and also for health and leisure.		Comments noted. Details would be available for consideration in Transport Assessments and Travel Plans, and policy seeks safe and convenient access for pedestrians and cyclists. No further action considered necessary.
121	D Shaw	NA	NA	D1	Implication extensive car ownership of 2 per unit of housing in many cases. NPPF para 29 and 30 requires that Local Plans need to support a pattern of development which facilitates the use of sustainable modes of transport. Expanded in NPPF para 34, need to travel will be maximised and the sustainable transport mode will be the private car.		Local Plan has been subject to a Sustainability Assessment.

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121	D Shaw	NA	NA	D1	Should consider ramifications for whole currently rural area as well as impact on traffic levels into and out of Dunchurch and beyond.		<p>The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be has shown that proposed mitigation schemes reduce traffic flows through Dunchurch crossroads compared to the existing levels. Proposed Appendix 3 Infrastructure Delivery Plan and DS9 have been amended following consideration of this consultation response and the updated Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124).</p>

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1353 & 1389	Julian Woolley	SHARE and About Turn	NA	D1	<p>Local plan does not address transport issues and uses baseline data from 2009. This is outdated and unacceptable. The updated information will be available from WCC in Feb and this has to be included. * WCC still using 2009 census data. The results of the 2016 survey have not been included in the modelling they have done for the Local Plan; * WCC has not modelled the impact of all extra traffic which would come from the South West Rugby sustainable urban extension on the A4071/straight mile junction; and * The county council has not modelled the impact of the extra traffic the Lodge Farm development would impose on the A45 eastbound into Northamptonshire.</p>	<p>All of the transport impacts have to be modelled on up to date information.</p>	<p>The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. STA has shown that proposed mitigation schemes reduce traffic flows through Dunchurch crossroads compared to the existing levels. Proposed Appendix 3 Infrastructure Delivery Plan and DS9 have been amended following consideration of this consultation response and the updated Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124).</p>

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1907	Martin Herbert	Brown & Co	Edward Walpole Brown	D1	<p>Several documents submitted, included site location plan; Insufficient time given by RBC to create full response; Surprised at omission of Walsgrave site (S14/075) at late stage in view of Coventry's need and need for 2,800 homes in Rugby Borough; preferred options does not deliver Coventry's unmet needs in a sustainable way as the need is for Coventry and not a random distribution of the 2,8000 homes across the entire district- which is contrary to the NPPF; contrary to NPPF paragraphs 8, 9, 14, 17, 21, 29, 30, 37, 38, 50, 69, 73, 75, 81, 114, 150, 151, 156, 157, 178, 179, 180, 181, 182; development distant from Coventry and Rugby; does not promote mixed use development; failure to comply with MOUU Paragraph 21; Sustainability appraisal fails to address economic and commuting issues; does not reflect ability of sites to change due to infrastructure provided as part of scheme; 4.12 supports concentration of services and facilities needed on the edge of Coventry and on the western edge of the Borough of Rugby; S14/047B scores well in context and is similar to S14/075 (the Walsgrave allocation); S14/047B</p>		<p>The selection of sites as informed by the SHLAA, and other relevant evidence, for proposed allocation contained within the development strategy represents the most sustainable strategy and the housing allocations ensure a continuous supply of housing to meet the housing target. All sites proposed are required to maintain a 5 year land supply throughout the plan period. Makes provision for a larger housing land supply relative to its identified requirement, much of this is linked to longer term infrastructure investment and part of large urban extension sites which will remain developable beyond the Plan period. 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</p>

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					<p>would provide an important link between areas of housing and employment; in Appendix 5 there is a heading missing on Page 241 and S14/07B should be between sites S14/046 and S14/049 on Page 466 so has not been considered; insufficient consideration that the Walsgrave Hill and Hill fields Farm sites have multiple potential accesses; allocating smaller sites within villages to achieve 5 year delivery flawed, untested and less sustainable; interim access available before A46 grade separated junction can be delivered; Preferred Option contrary to Core Strategy saved policies CS1- insufficient consultation on altering village boundaries; preferred option contrary to CS11 as proposed spatial strategy will not mitigate transport impacts because need is being distributed throughout Rugby; lack of focus on regional investment site at Ansty; combined area of sites S14/075 and S14/047B would provide a very sustainable mixed use scheme in an area naturally constrained by the M6 to the North, major road to the East, Coombe Country Park to the South and A46; little landscape</p>		<p>need. This approach and the MoU have also been accepted by the inspector of Warwick's local plan. No alteration proposed. The Local Plan seeks to allocate 110 hectares of employment land based on a number of factors identified within the evidence base such as average rates of past employment land take-up. Employment mix is informed by the Employment studies contained within the evidence base.</p>

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					<p>value of the land; Growth on the edge of Coventry required under MOU; scale and distribution of housing around Rugby is inappropriate due to distances from town centre and employment whereas S14/075 and S14/07B are close to employment; growth of rural settlements not sustainable and allocating 100 dwellings to 8 main rural settlements is arbitrary; housing trajectories based on outdated information; growth should be focused on the Rugby and Coventry urban edges; Plan is unsound due to growth being focused on Rugby thus failing to take into consideration Coventry's need; Ansty park a regionally significant employment site and no policies to assist growth of the site; Local Plan contrary to NPPF Paragraphs 7, 17, 21, 29, 34, 37, 47, 50, 157, 178, 180, 181 ; insufficient evidence that RBC has cooperated sufficiently with Coventry City Council;</p>		

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1909	Paul Hill	RPS	St Modwen	D1	<p>This policy concerned with encouraging use of sustainable modes of transport, sets out need for Transport Assessments and Travel Plans - generally supported. Following would make policy more effective:</p> <p>1. first sentence states that “Development will be permitted where sustainable modes of transport are prioritised...” Wording is vague and not effective.</p> <p>2. The second paragraph refers to avoiding adverse impacts of traffic. Inconsistent with paragraph 32 NPPF. Use of word “reduce” in place of “avoid” accepts that some traffic impact may, on balance, be acceptable. The use of the word “potential” ties the requirement to reduce impacts to the development proposals.</p> <p>3. Second sentence not currently positively prepared. Wording alterations suggested making clear that it might be the case that certain requirements of the policy may not apply to all development proposals.</p> <p>4. Last bullet points regarding large scale development make reference to smaller scale development this should be included as a separate paragraph.</p>	<p>Policy D1: Transport</p> <p>1. The first sentence of the second paragraph should be amended as follows: All large scale developments which result in the generation of significant traffic movements, should be supported by a Transport Assessment and where necessary a Travel Plan, to demonstrate practical and effective measures to be taken to avoid <u>reduce the potential</u> adverse impacts of traffic.</p> <p>2. The second sentence of the second paragraph should be amended as follows: It must-should <u>consider, where relevant:</u></p> <p>3. The final bullet point should be placed as a separate sentence as this does not relate to large scale developments.</p>	<p>Considered suitable that intention of policy is to avoid adverse impacts of traffic. 2. Considered reasonable to make considerations as a requirement 3. Not considered to be an issue of soundness but formatting issue. Will be corrected on adoption. Comments noted however no further action considered necessary</p>

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1314	Sue Green	Home Builders Federation	NA	D2	The Council should confirm that maximum car parking standards for residential developments are not been imposed	-	Residential parking standards are not stated as a maximum and accompanying notes advise they are guidance figures. Comments noted however no further action considered necessary
1378	Richard Allanch	NA	NA	D2	<p>Rugby Borough Council did not publish their proposed parking standards with their Preferred Options draft so this is the first time members of the public have the opportunity to comment on parking standards.</p> <p>For 16+ Colleges the Publication Draft proposes that with regard to parking for students and parents each case should be considered on its merits. Schools with sixth forms experience parking issues with regard to sixth formers – see Longrood Road and Duncan Drive for example.</p> <p>Therefore I believe the policy relating to 16+ Colleges should be extended to cover schools with sixth forms. Schools providing for pupils with learning difficulties and/or disabilities normally have very heavy parking requirements including requirements for their own minibuses etc. and also for the high staff to pupil ratio they have. A policy of two cars per classroom is likely to prove grossly inadequate for special schools. Therefore I believe the parking standard for special</p>		The parking standards are not intended to specify all forms of development. Details and individual circumstances of a proposal considered at application stage. Comments noted however no further action considered necessary.

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					schools should also be that each case should be considered on its merits. Where we have a lot of school parking on narrow residential streets we suffer traffic congestion contrary to National Planning Policy Framework paragraph 30.		
1246	Cllr Howard Roberts	Independent Group	NA	D3	Need for infrastructure to be in place before development is occupied, which will not be possible if sites like SW Rugby are built in a piecemeal fashion. Need for a relief road is clear however CIL money will not be present in such a form to allow for major infrastructure projects to be built.		Proposals formulated in relation to evidence base and considered deliverable. Comments noted however no further action considered necessary
1323	Sally Chant	Share	Sally Chant	D3	Very concerned that only one new secondary school is being sourced for the local plan when WCC have stated two are required (in addition to sites already identified at Mast Site and SW Rugby). Only one additional is being sought as Rugby Free Secondary School (RFSS) is considered to be 'already open' even though only situated on a temporary site. If two additional schools are required (if WCC Education figures are correct), these should be in the local plan in the correct area of town and not on open space. We do not believe it is acceptable for developers to		WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.

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					<p>profit from development without providing appropriate infrastructure for the houses that are built. Ensuring appropriate land available in local plan can work if RBC works with WCC Education and EFA to meet this goal. Further concern that additional two schools required may only be used to support the SUEs whilst in development and once SUEs are built the viability of at least one of these schools could be at risk. Does Rugby genuinely need two additional schools on a permanent basis? Concerned that Mast site secondary school only required at 3,000 dwelling trigger points and impact this has on provision in meantime - responsible solution is to build school where consent is already secured and bring forward delivery on Mast site.</p>		
1428	Anne Denby	Canal & River Trust	NA	D3	<p>The Canal & River Trust generally seeks to maintain its assets in a 'steady state', and in the case of towpath maintenance, this is based on current usage. Where new development has the likelihood to increase usage, the Trust's maintenance liabilities will also increase, and we consider that it is reasonable that in relation to those identified sites Towpath and access</p>		<p>Where increased usage and resultant impact can be proven by specific evidence during the preparation of the Local Plan, contributions to towpath maintenance could be identified in the IDP. RBC has not been made aware of specific evidence at this stage relating to proposed allocations in the local plan. The opportunity exists at planning application stage for S106 contributions to be required for towpath maintenance where in accordance with regulations.</p>

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					enhancement works could form part of the infrastructure needs.		No further action considered necessary
1428	Anne Denby	Canal & River Trust	NA	D3	The Canal & River Trust generally seeks to maintain its assets in a 'steady state', and in the case of towpath maintenance, this is based on current usage. Where new development has the likelihood to increase usage, the Trust's maintenance liabilities will also increase, and we consider that it is reasonable that in relation to those identified sites Towpath and access enhancement works could form part of the infrastructure needs.	Where increased usage and resultant impact can be proven by specific evidence during the preparation of the Local Plan, contributions to towpath maintenance could be identified in the IDP. RBC is not aware of the existence of such evidence at this stage.	WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.

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1431	Nick Dauncey (Jasbir Kaur)	WCC Highways	NA	D3	Schemes listed in IDS essential to mitigate development impacts and lists mitigation schemes not listed in the IDS but are in STA Table 1; site promoters will be expected to support cycling through provision for cyclists within the site itself and through securing funding for the wider cycling network; developers should lease directly with stagecoach to secure high frequency bus services to the site;	following mitigation schemes which do not appear to be listed in the IDS but are identified in Table 1 of the STA also need to be included: Essential: Dunchurch Signposting Potsford Dam Roundabout Rugby Gyrotory Dunchurch Road Sainsbury's Roundabout Cawston Grange Drive/A4071 Recommended: Hillmorton Road Pedestrian Crossing Leisure Centre Access Clifton Road/Lower Hillmorton Road roundabout Whitehall Road Pedestrian Crossing Full signalisation of M6 J1Full signalisation of M45/A45 A426/Central Park Drive A426 Newton Manor Lane .We suggest that there should also be a contingency for unforeseen impacts.	Proposed Appendix 3 Infrastructure Delivery Plan and DS8 have been amended following consideration of this consultation response and the updated Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124).

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1431	Nick Dauncey (Jasbir Kaur)	WCC Highways	NA	D3	<p>Reword 'Mitigation to M6 J1' in the IDP table to 'Full signalisation of M6 J1'. The following mitigation schemes which do not appear to be listed in the IDP but are identified in Table 1 of the STA also need to be included:</p> <p>Essential: M6 to Coton House Rugby Gyrotory</p> <p>Recommended: Hillmorton Road Pedestrian Crossing Leisure Centre Access Clifton Road/Lower Hillmorton Road roundabout Whitehall Road Pedestrian Crossing Butlers Leap/Clifton Road. These developments will also be reliant upon the delivery of the Avon Mill/Hunters Lane improvement scheme and, if it is not fully funded at the time they come forward, contributions from them should be sought to aid delivery of this scheme.</p>		Proposed Appendix 3 Infrastructure Delivery Plan has been amended following consideration of this consultation response and the updated Strategic Transport Assessment (June 2017), as shown by modifications LP54.116-140.

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1431	Nick Dauncey (Jasbir Kaur)	WCC Highways	NA	D3	<p>Preferred option for Strategic Link 2 (North to South) Option 1 - A4071 Potsford Dam Connection comprises a connection onto the A4071 south of Potsford Dam roundabout (Option 1) for the reasons outlined in paragraph 1.30 of the STA. provides considerable safety benefits WCC will submit further evidence on safety to support this view. Traffic & Road Safety Team would be strongly opposed to any further traffic using proposed signals on B4642 Coventry Rd which would arise under Option 2, and have recommended that Option 1 should be taken forward. WCC will provide further technical note on this.</p>		<p>Proposed Appendix 3 Infrastructure Delivery Plan and DS8 have been amended following consideration of this consultation response and the updated Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124).</p>

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1431	Nick Dauncey (Jasbir Kaur)	WCC Highways	NA	D3	<p>Lodge Farm would need to contribute to the same transport schemes as the South West SUE identified in the IDS and additional attention to:</p> <ul style="list-style-type: none"> access restrictions and/or traffic calming in Dunchurch to deter through-trips. A45/ M45 junction improvements. Contingency for unforeseen impacts provision for cyclists within the site itself and securing developer funding towards wider cycling improvements in the vicinity of the site with connections to surrounding network. Promoter liaises directly with Stagecoach o securing high frequency bus services for the site. Improvements to the cycle network by the developer could encourage residents to cycle to access rail stations. WCC key objective is to encourage traffic generated by the proposed site to avoid these areas altogether. A “road signing strategy” directing traffic seeking access to north Rugby, destinations further north including M6 and town centre bound trips onto M45 westbound. This traffic would then be signed via M45/A45/B4429 roundabout at Thurlaston onto proposed North- 		<p>Proposed Appendix 3 Infrastructure Delivery Plan has been amended following consideration of this consultation response and the updated Strategic Transport Assessment. Cross reference this with the minor changes table and add in the reference.</p>

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					<p>South link road through the western part of the South West development area for access to the Rugby Western Relief Road. Complementary measures at Dunchurch Crossroads required: Dunchurch crossroads will improve once SWLR is in place. Signage strategy would prevent additional traffic using this route through banning right turn from the B4429 or stopping up the route altogether to force traffic onto the M45/A45 where (for the time being) there is capacity for the traffic to be accommodated. WCC expect site promoter to assess traffic impacts in villages to south west of site e.g. Woolscott & Grandborough.</p>		
1525	E Davies-Pelc	NA	NA	D3	<p>Infrastructure already stretched to its limit in regard to the present population (as observed on the roads in and out of the village) to add to it would make further demands on it which can only be to the detriment of the present population in terms of their quality of life.</p>		<p>WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. Additional details will be finalised at the Planning Application stage.</p>

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1687	Linda Tomalin	NA	NA	D3	The Plan makes passing reference to infrastructure requirements but provides no assurance that the needs of the development on this massive scale can be met. Facilities such as the leisure centre, hospital etc. is not suitable for the size of the town at present, let alone the future. Past experience (e.g. Cawston) suggests that it takes a great deal of time to provide supporting infrastructure and services and that the impact of existing services and infrastructure is severely underestimated.		Proposals formulated in relation to evidence base and considered deliverable. Comments noted however no further action considered necessary
1455 & 1900	Louise Steele	Framptons	DB Symmetry, Taylor Wimpy, Gallagher Estates, Richborough Estates and Warwickshire County Council	D3	Subject to technical justification, the Parties view is that the Spine Road Network will be delivered at the earliest opportunity.		Committed noted. Proposed Appendix 3 Infrastructure Delivery Plan and DS9 have been amended following consideration of this consultation response and the updated Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124).
1489	David Ralph	NA	NA	D3	Rush hour now a day-long issue. RBC/WCC to be commended on the provision of cycle ways, and would encourage more to be provided especially within as well as a result of new developments.		Comments on cycling provision welcomed.

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1489	David Ralph	NA	NA	D3	With increase in internet shopping the rapid and efficient delivery requirements has become even more important as well as accessibility for large articulated HGV's.		Comments noted
1489	Paul Hill	RPS	St Modwen	D3	<p>1. The policy as it is currently drafted is too broad, the use of the wording "scale and pace" of development is not clear. It is not clear whether this requirement is related to whether planning permission would be granted for schemes, the rate of delivery of such schemes, or whether it is simply a general comment that should be included within the supporting text rather than the policy itself.</p> <p>2. The policy, which seems to imply that without sufficient mitigation in place, or to be secured through a scheme, a proposal would not be acceptable is in conflict with the first paragraph of the explanatory text (11.12) which states that "the Council can require that the developer and/or landowner contribute, as long as such requirements do not render the scheme unviable". The policy itself however makes no mention of viability, or how the Council would consider partial contributions that may mitigate</p>	<p>Policy D3: Infrastructure and Implementation</p> <p>1. It is recommended that the first sentence is removed: The scale and pace of new development will be dependent on sufficient capacity being available in existing infrastructure to meet the demands of new development.</p> <p>2. It is recommended that the second sentence is amended as follows: Where <u>this appropriate existing infrastructure provision</u> cannot be demonstrated permission for new development will only be granted where additional capacity can be released through better management of existing infrastructure, or through the provision of new infrastructure.</p>	<p>1. Considered suitable for inclusion in order to ensure adequate infrastructure is available for development. 2. Wording considered suitable and relates to the first sentence. Comments noted however no further action considered necessary.</p>

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					some, but not all of the impacts of a proposed development.		
1489	D Clark	NA	NA	D3	Gridlock in Rugby, especially traffic jams on the gyratory system.		The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation.

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922 or 1509	Dr G R Joshi	NA	NA	D3	<p>Lack of sufficient secondary schools in North of Rugby. Noted most of the pupils travel great distances when they are admitted to secondary schools. Unprecedented growth in past 10-15 years. Nowadays more than 75% of the journeys involve motor vehicles going across the town centre or gyratory. This not only increases travel time but also impacts of traffic congestion.</p>		<p>WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140. The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. Proposed Appendix 3 Infrastructure Delivery Plan and DS9 have been amended following consideration of this consultation response and the updated Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124).</p>

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1449	Louise Portman	The Wilkes Partnership LLP	University Hospital Coventry	D4	Should be amended to take on board any shortfall in public sector services funding caused by the impact of the development and would suggest that the first line of Para 11.8 in the draft Local Plan is amended in the following terms."11.18Planning Obligations are key to ensuring that the impacts of development are mitigated against where infrastructure needs (including public service funding shortfalls) arise from the development...."	-	Not considered suitable to specify public service funding shortfalls and would not be CIL compliant. Comments noted however no further action considered necessary
1875	Michelle Simpson-Gallego	Pegasus Planning	AC Lloyd / Persimmon	D4	Supported that financial viability is a consideration in determining planning obligations to make a development acceptable in planning terms. Important therefore that future CIL policies have similar provisions to retain flexibility otherwise non CIL obligations (e.g. affordable housing) may be compromised.		Comments noted however no further action considered necessary.

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
2121	Michelle Simpson	Pegasus Group	NA	D4	There is no requirement to review the SHMA, so the data may become outdated and given it's prepared on a Housing Market Area wide basis, the authority has less control over when the assessments will be revised. The SHMA reviewed housing mix on a borough-wide basis and does not consider locational differences, which may influence dwelling provision on individual sites. Housing mix should be decided on a site-by-site basis rather than a blanket requirement.		The representations highlight concerns relating to the soundness of the plan which need to be explored through the oral part of the examination.
1106 & 1913	David Joseph	NA	NA	D4	DS 3.8 land North of Coventry Road, Long Lawford could be capable of accommodating more than 100 dwellings, so greater flexibility on capacity assumptions required	Amend residential allocation DS3.8 to a minimum of 100 dwellings	The Main Rural Settlement Pack details the allocation of DS3.10 including reference to the heritage asset review and the archaeological constraints which are considered at the local plan stage to limit the capacity of the site to 100. No change recommended.