

RUGBY BOROUGH LOCAL PLAN Publication Draft



Representation Form

Con ID:

Rep ID:

(For official use only)

Please return to Rugby Borough Council by 5.00pm on Friday 11th November 2016

Please read the guidance notes accompanying this form before making your representation. Forms should be completed in black ink or typed. You are advised to keep a copy of the representation(s) you submit.

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). **Please fill in a separate sheet for each representation you wish to make. You may photocopy the form or obtain further copies using the contact details provided.**

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mr	
First Name	Tom	
Last Name	James	
Job Title (if applicable)	Principal Policy Officer (Planning)	
Organisation (if applicable)	Daventry District Council	
Address Line 1	Lodge Road	
Address Line 2	Daventry	
Address Line 3	Northamptonshire	
Address Line 4		
Post Code	NN11 4FP	
Contact Telephone Number	01327 302290	
E-mail Address	tjames@daventrydc.gov.uk	

Part B – Please use a separate sheet for each representation

Name or Organisation: Daventry District Council

3. To which part of the Plan does this representation relate?

Paragraph / Page Number	<input type="text"/>	Policy Number	DS10	Proposals Map Reference	<input type="text"/>
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4. Do you consider the Plan is

4.(1) Legally compliant*	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound*	Yes	<input type="text"/>	No	<input checked="" type="text"/>

* Refer to guidance notes for explanation.

If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Plan is **unsound** because it is not:

(1) Positively Prepared	<input type="text"/>
(2) Justified	<input checked="" type="text"/>
(3) Effective	<input type="text"/>
(4) Consistent with national policy	<input type="text"/>

6. Please give details of why you consider the Plan is not legally compliant or is unsound. Please be as precise as possible

If you wish to support the legal compliance or soundness of the Plan, please also use this box to set out your comments.

Overview

DDC understands the need for the plan to comply with the NPPF with regards to significantly boosting the supply of housing. However the plan does not justify why provision needs to be made on a greenfield site in a location outside of its development strategy to achieve this. The plan acknowledges the significant supply of existing permissions and allocations, and includes a trajectory setting out how this is expected to be delivered. However, it does not explain what analysis has been undertaken to explore how delivery on existing permissions/allocations could be accelerated, by measures such as early delivery of infrastructure, self build, increased outlets etc. Arguably a more focused delivery strategy would make better use of existing infrastructure and require less new infrastructure and would therefore have a higher chance of increased delivery than the more ‘dispersed’ approach that is being suggested. There is no evidence that increasing the supply of allocations in the way proposed will actually increase delivery.

Strategic Transport Assessment

The Strategic Transport Assessment (STA) that has been prepared to inform the Local Plan does not fully account for transport impact arising from the proposed Lodge Farm allocation. The STA uses the Rugby Wide Area (RWA) S-Paramics micro-simulation model. Figure 1 of the STA shows the extent of the RWA network which is limited to Rugby town, DIRFT and a limited number of villages. It does not extend southwards along the A45 as far as the proposed Lodge Farm allocation, nor does it include potential ‘rat runs’ such as Longdown Road/The Ridgeway. Given the proximity of the site to the M1, A5 and taking account of future plans including the expansion of DIRFT and the M1 Junction 16 Employment Area allocated in the West Northamptonshire Joint Core Strategy (and now with planning permission), the area of the network to be assessed should extend into Daventry District to include the villages that are located in this area and also account for employment areas located in Daventry town. The relationship of prospective residents of Lodge Farm with these areas should be explored or at least the study should demonstrate why they have been excluded. This information is required to enable an assessment to be made of the impact that the Lodge Farm allocation would have on the amenity of Daventry District residents particularly given that the draft Local Plan itself acknowledges the proximity of the site to rural villages in the Daventry District and Daventry itself within paragraph 4.71.

Officers from Daventry District Council, Northamptonshire County Council Highways and Education, Rugby Borough Council and Warwickshire Highways and Education met with regard to this allocation and as part of the duty to co-operate. Further to this comments were provided to Rugby Borough Council from Daventry District Council and Northamptonshire County Council requesting changes to the scope of the Transport Assessment. It was also suggested that a gravity model be used instead of the RWA model, so that wider highway impacts from the site could be understood. NCC also requested that the final scoping could be agreed in advance of completion of the Transport Assessment. However, a final scope was never received.

Infrastructure Delivery Plan

The Infrastructure Delivery Plan states that new 2 forms of entry (fe) primary school provision will be delivered in phase 2 of the Local Plan. When aligned against the housing trajectory in Appendix 2 this would indicate that this provision would take place after 25 houses. Daventry District Council support the early provision of primary school places as this would hopefully reduce the impact on schooling in Daventry District and reduce impact on local infrastructure through additional journeys to and from local schools therefore helping the development function better and be a more attractive place to live. However assurance is sought that this can realistically be achieved. If not, then sustainability of the scheme would need to be re-assessed.

Sustainability Appraisal

DDC questions some of the scoring assigned to each sustainability objective for policy DS10.

- In respect of objective 2, a score of ‘++’ is considered to be too positive given that the proposed allocation would not include any provision of leisure or cultural opportunities and although there is a policy requirement for public transport links within policy DS10, this requirement is not listed in the Infrastructure Delivery Plan and there is no evidence that such provision would be delivered.
- Objective 6 is assigned a score of ‘+’ which is considered to be too positive as no employment provision is proposed as part of the allocation and there is no employment area within walking distance. Further to this, although there is a policy requirement for public transport links to surrounding villages, Rugby and Daventry within policy DS10, there is no requirement for any public transport links to employment opportunities at DIRFT and this requirement is not listed in the Infrastructure Delivery Plan. There is no evidence that such provision would be delivered.
- Objective 8 is scored as a ‘-’ and it is considered that this should be ‘--’ as the proposed allocation will not support the regeneration of urban areas due to its greenfield location that is isolated from existing urban areas.
- Objective 11 is scored as a ‘+’ however given there are no employment opportunities on site and limited public transport provision to employment areas as there is no policy requirement for bus services to DIRFT, it is considered this should be 0 as car use for travel to work is highly likely.
- Objective 14 is score ‘++’ however given the limited nature of the strategic transport assessment it is not clear what impact the proposed allocation would have on all surrounding roads and therefore the proposed allocation may not promote a sustainable and accessible transport network.

7. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Strategic Transport Assessment should be revisited and the transport impact of the DS10 Lodge Farm allocation should be remodeled to include any transport impact on roads outside of Warwickshire and into the North of Daventry District, including Onley Park, Barby, Kilsby, Crick and Yelvertoft, and towards Daventry town and the M1. The results of this modelling would enable assessment to be made of the impact that the Lodge Farm allocation would have on the amenity of Daventry District residents, particularly given that the draft Local Plan itself acknowledges the proximity of the site to rural villages in the Daventry District and Daventry itself within paragraph 4.71.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? *Please note that if you do not participate at the oral examination your representations will be dealt with as written representations and will carry the same weight as those presented orally.*

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To enable the Council to articulate its concerns regarding the Strategic Transport Assessment, particularly that it does not address impacts on parts of Daventry District.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Do you wish to be notified of any of the following? (Please tick as appropriate)

The submission of the Local Plan for independent examination.

The publication of the recommendations of the Inspector.

Signature:

Date:

Please note that:

The Borough Council will acknowledge receipt of your representation(s) as soon as possible.

Representations cannot be kept confidential. All representations received and any information provided will be open to public scrutiny including publication on the Borough Council's website.

PLEASE RETURN COMPLETED FORMS TO:

**Development Strategy
Growth and Investment Services
Rugby Borough Council
Town Hall
Evreux Way
CV21 2RR**

Or by e-mail to localplan@rugby.gov.uk

You can download this representation form online on our website: www.rugby.gov.uk - where you will also find the Publication Draft and all supporting documents. If you have any queries, please **contact the Development Strategy Team** on (01788) 533735.

**REPRESENTATIONS MUST BE RECEIVED NO LATER THAN
5.00PM ON 11th November 2016**

