



**TOPIC PAPER:**  
**GREEN BELT – EXCEPTIONAL**  
**CIRCUMSTANCES**  
**DECEMBER 2025**

# 1. BACKGROUND

- 1.1. This topic paper sets out the council's position on exceptional circumstances justifying changes to Green Belt boundaries.
- 1.2. Green Belt is a local, not a national, policy designation. It does not have a statutory basis, unlike for example conservation areas or national landscapes. It is a policy and is designated in the development plan.
- 1.3. Green Belt is not a landscape quality designation. It is an urban planning tool. Its purposes, currently defined in paragraph 143 of the National Planning Policy Framework (NPPF), are largely morphological, they are about restraining the expansion of urban areas. Specifically (to paraphrase) preventing unrestricted sprawl, towns merging, encroachment on the countryside and preserving the special character of historic towns.
- 1.4. The current Green Belt for Rugby Borough is defined in the Rugby Borough Local Plan 2011-2031 adopted in June 2019. The Green Belt in Rugby Borough was first defined fifty years ago in the Warwickshire Structure Plan 1975. Since then it has been consistently designated in successive structure plans, core strategies and local plans. In that period there have been changes to Green Belt boundaries, including the removal of inset villages in the 1997 Local Plan and most recently the removal of Green Belt allocations at main rural settlements in the 2019 plan.
- 1.5. Under s19(2) of The Planning and Compulsory Purchase Act 2004, in preparing local development documents the local planning authority must have regard to national policies and guidance issued by the Secretary of State. Section 20(5)(b) further requires development plan documents to be subject to independent examination, one of the purposes of which is to determine whether the document is sound. National policy outlines how soundness should be assessed, and this includes a test of consistency with national policy.
- 1.6. Current national policy on Green Belt is set out in the National Planning Policy Framework 2024. On Green Belt changes, paragraph 145 states:

*Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.*

- 1.7. Paragraph 146 then states:

*Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.*

- 1.8. Further guidance is contained in paragraph 147 and 148:

*147. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy:*

*a) makes as much use as possible of suitable brownfield sites and underutilised land;*

*b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

*148. Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.*

1.9. The test of “exceptional circumstances” for Green Belt changes has been a feature of Green Belt policy since Department of Environment Circular 14/84. It was carried forward in PPG2 Green Belt (first published in 1998 and updated in 1995 and 2001) and into successive versions of the National Planning Policy Framework since 2012. This follows a more expansive stage of Green Belt creation through to the 1980s, including (in the Midlands) the West Midlands Green Belt (1975), Nottingham and Derby Green Belt (1980s), South Derbyshire Green Belt (1983).

1.10. There is useful commentary on the “exceptional circumstances” test in the case of Compton Parish Council & Ors v Guildford Borough Council & Anor [2019] EWHC 3242 (Admin). In that case Sir Duncan Ouseley said:

*68. There is no definition of the policy concept of "exceptional circumstances". This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case; Calverton Parish Council v Nottingham City Council [2015] EWHC 1078 at [20], Jay J. It is deliberately broad, and not susceptible to dictionary definition.*

*(...)*

*70. "Exceptional circumstances" is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires "very special circumstances." That difference is clear enough from the language itself and the different contexts in which they appear, but if authority were necessary, it can be found in R(Luton BC) v Central Bedfordshire Council [2015] EWCA Civ 537 at [56], Sales LJ. As Patterson J pointed out in IM*

*Properties Development Ltd v Lichfield DC [2014] EWHC 2240 at [90-91 and 95-96], there is no requirement that Green Belt land be released as a last resort, nor was it necessary to show that assumptions upon which the Green Belt boundary had been drawn, had been falsified by subsequent events.*

*71. ... The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.*

*72. General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that "exceptional circumstances" exist (...) These factors do not exist in a vacuum or by themselves: there will almost inevitably be an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy. The analysis in Calverton PC of how the issue should be approached was described by Jay J as perhaps a counsel of perfection; but it is not exhaustive or a checklist. The points may not all matter in any particular case, and others may be important especially the overall distribution of development, and the scope for other uses to be provided for along with sustainable infrastructure."*

- 1.11. Exceptional circumstances is, therefore, a planning judgment and involves consideration of a range of factors. The *Guildford* judgment concerned a local plan examined under the 2012 NPPF. The 2018 NPPF and subsequent versions introduced a list of specific factors to consider, including a requirement to examine fully all other reasonable options for meeting its identified need for development before concluding the exceptional circumstances exist. This now forms NPPF 2024 paragraph 147 (reproduced above).

## 2. EXCEPTIONAL CIRCUMSTANCES

- 2.1. The council's case for exceptional circumstances is different for the different types of potential Green Belt release through the local plan: (1) removal of large already-developed industrial areas (2) Gypsy and Traveller site allocations (3) employment site allocations (4) residential site allocations. The Green Belt boundary changes proposed are shown in the evidence base document titled 'Summary of Green Belt Changes Proposed by Rugby Borough Council's Regulation 19 Local Plan'. The justification for each of these proposed releases is outlined in turn below.

### EXISTING INDUSTRIAL AREAS

- 2.2. Two existing large industrial estates are proposed to be removed from the Green Belt. These are at Ansty Park and Prologis Park Ryton (formerly Peugeot). Industrial uses at Ansty Park and Prologis Park (formerly Peugeot) significantly predate the creation of the Green Belt in the borough in 1975. The development of these sites for industrial, research and development and logistics uses is now, in the case of Prologis Ryton, complete, and in the case of Ansty Park close to completion.
- 2.3. The Rugby Borough Green Belt Contribution Study Strategic Assessment 2025 identifies these

areas as grey belt and shows that they make a weak/no contribution to Green Belt purposes. In that context, their continued designation as Green Belt constitutes an unnecessary constraint on future development proposals within the industrial estates, including minor applications.

- 2.4. Retaining the Green Belt designation of these sites would also be inconsistent with the proposed removal from the Green Belt of new proposed allocations (see below). It is therefore proposed that these sites are removed and inset from the Green Belt. As part of wider Green Belt changes proposed through the new local plan, there are exceptional circumstances to remove these sites from the Green Belt.

## GYPSY AND TRAVELLER ALLOCATIONS

- 2.5. Gypsy and Traveller allocations within the Green Belt are proposed in the following locations:

- 2.5.1. Walsgrave Hill, as part of the employment land allocation for 8 pitches
- 2.5.2. At land adjacent to Rosefields, Hinckley Road, Wolvey for 1 pitch
- 2.5.3. At Top Park, Top Road, Barnacle for 22 pitches
- 2.5.4. At Wilsher Ranch/Nethergreen, Shilton Lane, Shilton for 4 pitches
- 2.5.5. At Bryants Bundalow, Brandon Lane for 10 pitches

- 2.6. The Rugby Borough Green Belt Contribution Study Strategic Assessment 2025 identifies the site at Rosefields, Hinckley Road, Wolvey as provisionally grey belt. The Green Belt Contribution Study Stage 2: Site Contribution Assessments 2025 looks in more detail at Top Park and Bryants Bungalow. Both sites are identified in the Stage 2 assessment as provisionally grey belt.

- 2.7. A stage 2 assessment has also been undertaken for Wilshire Ranch and Walsgrave Hill. Wilshire Ranch is not identified as grey belt. Most of the Walsgrave Hill site is identified as not comprising grey belt, with a smaller eastern part of the site comprising grey belt. The location of Gypsy/Traveller pitches would be within the part of the site identified as grey belt. The wider Walsgrave Hill site is proposed to be removed from the Green Belt to facilitate its development for employment uses. This is discussed in the following section below.

- 2.8. Paragraph 155 of the National Planning Policy Framework (NPPF, 2024) supports the development of grey belt land where:

- “a. ...the development would (...) not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b. There is a demonstrable unmet need for the type of development proposed;
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below”

- 2.9. Paragraph d. is not applicable to proposals for Gypsy and Traveller pitches. For the purposes of paragraph a. the small scale of the proposed pitches means that development would not fundamentally undermine the purposes of the large areas of Green Belt that would remain. There

is a clear unmet need for Gypsy and Traveller pitches as demonstrated in the Gypsy and Traveller Accommodation Needs Assessment (2025) for the purposes of paragraph b.

- 2.10. The main question, therefore, remains whether the proposals would satisfy NPPF paragraph 155c and be in a “sustainable location”. Prior appeal decisions are a useful guide to the approach a future decision maker might take in considering these locations:

Rosefields was granted 3-year temporary planning permission at appeal on 19 September 2023 Appeal Ref: APP/E3715/W/22/3309858 and before that by the local authority in 2014 and 2018. This is therefore a longstanding pitch. This Inspector’s 2023 decision letter did not comment on whether the site was sustainably located.

- 2.10.1. Top Park benefits from temporary planning permissions under the following reference numbers:

2.10.1.1. R15/2017 for 15 pitches

2.10.1.2. R24/0975, R24/0976, R24/0977, R24/0978 (2 pitches), R24/0979 & R24/0980 for a combined 7 pitches.

- 2.10.2. The latter pitches were considered in a 15 March 2024 appeal decision (refs APP/E3715/W/23/3328404, APP/E3715/W/23/3328398, APP/E3715/W/23/3328397, APP/E3715/W/23/3328399, APP/E3715/W/23/3328396, APP/E3715/W/23/3328395). The appeals were dismissed because it had not been demonstrated that all relevant owners of the service road and the track had been notified of the schemes. Plus the red line boundary only ran to the hedge line with Top Road and did not run to the carriageway itself so was unclear whether consent to cross that land would need to be obtained from the Highway Authority or someone else. In addition, the Inspector was of the view that no planning permission existed for the track to be used in connection with development intended. Hence the appeals were dismissed. Nonetheless, on the sustainability of the locations the Inspector commented as follows:

“35. Bulkington, with its relatively wide range of day-to-day services, is quite close, while the edge of Coventry is not far away. However, the roads in the area tend not to have pavements, have limited lighting, and carry relatively fast traffic, and so walking to these services is unattractive and unrealistic.

Therefore, to access them from these sites would require a reliance on the private car. These journeys though would not be long, and I consider they would not be sufficient to render these sites as being unsustainable locations for Gypsy and Traveller pitches.”

- 2.11. On 21 February 2025 a proposal for two pitches at Treetops. Shilton Lane, Shilton, Coventry CV7 9LH (APP/E3715/W/24/3344241) was granted planning permission at appeal. Treetops lies approximately 90 metres from Wilsher Ranch on the opposite side of Shilton Lane, but is not a dissimilar location in many respects from the grey belt sites. In that appeal decision the inspector commented: “...the proposal would not be in a sustainable location so future occupants would not benefit from the health and resilience provided by independent active travel”. In reaching that conclusion, the Inspector was influenced by the lack of a pedestrian footpath on Shilton Lane and the lack of public transport stops nearby. The inspector nonetheless allowed the appeal, citing the acute need for pitches.



- 2.12. This discussion indicates divergent views from decision makers as to what is a sustainable location. It cannot be assumed that, even if allocated in the plan, planning permission for pitches would be granted pursuant to section 155 NPPF by future decision makers. Therefore, it is necessary to also remove the site allocations from the Green Belt to pave the way for future grant of planning permission. In the absence of removal from the Green Belt, there would be a risk that permission would not be granted at the planning application stage and so the proposed site allocations would not be effective.
- 2.13. There are exceptional circumstances justifying the removal of the Gypsy and Traveller site allocations from the Green Belt for the following reasons:
- 2.13.1. The need for Gypsy and Traveller pitches is significant, comprising 94 pitches in the period 2024/25 to 2041/42. Even with the proposed Green Belt allocations, the local plan is able to identify supply for 68 pitches over that period. Therefore there remains a shortfall.
- 2.13.2. A call for Gypsy and Traveller sites as part of a proposed Gypsy and Traveller Site Allocations DPD was undertaken between 7<sup>th</sup> October and 18<sup>th</sup> November 2022 and no sites were put forward. On the basis that this rendered preparation of the DPD untenable, on 25 October 2023 council decided to discontinue the preparation of the Gypsy and Traveller Site Allocations DPD and instead combine this into the new Local Plan.
- 2.13.3. A further call for sites was undertaken alongside the local plan issues and options consultation between 30 October 2023 and 2 February 2024 and no sites were put forward for Gypsy and Traveller pitches.
- 2.13.4. The consultant undertaking the Gypsy and Traveller Accommodation Assessment 2025 was tasked with making enquiries directly with the Gypsy and Traveller community to seek to identify site options. Those enquiries identified no non-Green Belt site options.
- 2.13.5. There are no existing non-Green Belt Gypsy or Traveller sites either private or publicly owned within the borough that could be expanded.
- 2.13.6. On 25 April 2025 letters were sent to all neighbouring authorities highlighting the shortfall in Gypsy and Traveller pitches and enquiring as to whether they could assist in meeting this unmet need. The unmet need is also recorded in the Memorandum of Understanding between Coventry and Warwickshire authorities which was signed by Rugby Borough Council on 28 July 2025. No offers of assistance in meeting the unmet need have been forthcoming in response.
- 2.13.7. Meetings were held with the Service Manager for Gypsy and Travellers at Warwickshire County Council on 11 May 2023 on 12 March 2025 and on 8 October 2025, the latter two meetings as part of the wider Coventry Warwickshire planning officers meeting. Warwickshire County Council (WCC) have indicated that they are not able to create a new county council owned Gypsy and Traveller site in Rugby Borough on WCC-owned land, but may consider taking on and managing a new site if one were to be identified on other land. There is no current county council owned site in the borough which could be expanded.
- 2.13.8. A recent planning appeal at Land adjacent to Treetops, Shilton Lane, Shilton CV7 9LH, appeal ref: APP/E3715/W/24/3344241, application ref is R21/1234 dated 21 February 2025 (referred to above) found the existence of very special circumstances justifying permission for pitches in

the Green Belt. In part, those circumstances were based on “the acute unmet need for pitches”. The Inspector in that appeal stated ““45. Thus, the Council has a high level of unmet need, no allocations and no five-year supply of sites. The situation has been long standing and it is unclear whether the emerging local plan will address this matter any time soon. The indications are that there has been a failure of policy.”. Very special circumstances is a higher bar than exceptional circumstances.

- 2.13.9. As noted above, the proposed allocations at Rosefields and Top Park currently benefit from temporary planning permission and are longstanding sites.
- 2.14. Taken together, these circumstances are exceptional and justify the proposed Green Belt release to deliver Gypsy and Traveller pitches.
- 2.15. On that basis the sites at Rosefields, Top Park, Wilsher Ranch and Bryant Bungalow are proposed to be removed from the Green Belt. Green Belt removal at Walsgrave Hill is not proposed because the exact location of the pitches has not yet been determined. It is likely that the pitches would be in a part of the site that would remain in the Green Belt but is defined in the Stage 2 Green Belt Assessment as provisionally grey belt. Those pitches would need to come forward under NPPF para 155.

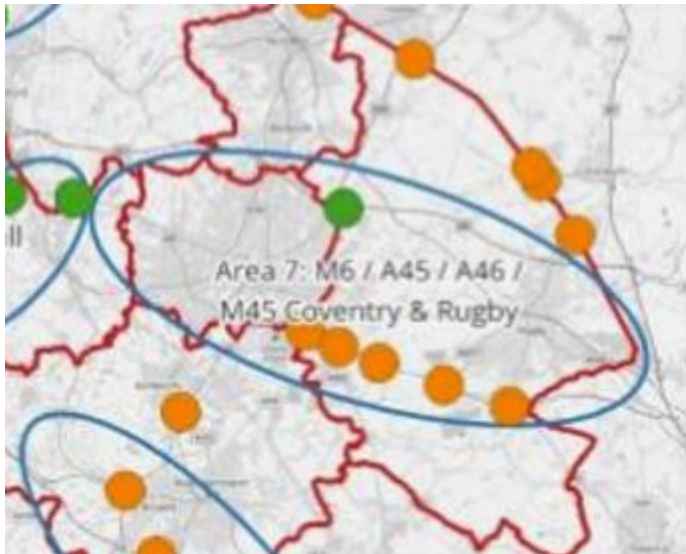
## EMPLOYMENT ALLOCATIONS

- 2.16. Three Green Belt allocations for employment land are proposed:
- 2.16.1. Ansty Park north, site 14 for 75,000m<sup>2</sup> of floorspace (site area 36.94ha)
- 2.16.2. Walsgrave Hill, site 121 for 290,000m<sup>2</sup> of floorspace (site area 201.83ha)
- 2.16.3. Crouner Fields Farm and Home Farm, Hinckley Road, Ansty, site 95 for 275,000m<sup>2</sup> of floorspace, site area 112.18ha
- 2.17. The extent of land removed from the Green Belt at Walsgrave Hill and Crouner Fields Farm and Home farm is limited to that necessary to deliver the employment development. Areas proposed to constitute landscaping/ecology land/public open space within these site allocations would remain in the Green Belt as these uses can be delivered as appropriate development in the Green Belt.
- 2.18. The exceptional circumstances justifying release from the Green Belt of these employment allocations are explained in this section. First, however, it is useful to briefly explain the derivation of the employment need that these sites would meet and why this need could not be met in neighbouring authorities.
- 2.19. As set out in the Development Needs Topic Paper, the gross need for employment land in Rugby Borough is significant, comprising approximately 1,034,000m<sup>2</sup> (approx. 287 hectares) of floorspace for use classes B2, E(g)(ii) and (iii), and B8. Approximately 77% of this gross need is need for employment land on large sites derived from the West Midlands Strategic Employment Sites Study 2024 (WMSESS).
- 2.20. The residual need after existing commitments comprises 310,711m<sup>2</sup> (88.77ha) for strategic sites and 219,170.6 square metres (54.79ha) for local need, together with 2.5ha (10,000sqm) of Coventry City Council unmet local need. Therefore, approximately 60% of the residual need is for



large sites to meet strategic need derived from the WMSESS or is unmet need from Coventry.

- 2.21. This need for large 'strategic' sites derives from the WMSESS, specifically the WMSESS's proposed apportionment to opportunity area 7 (shown mapped below) of the wider assessed West Midlands need for employment land on large sites.



- 2.22. The WMSESS states the following of opportunity area 7:

“Coventry and Rugby continue to be the key markets in the Midlands and continue to see high levels of demand and resulting take-up. The market is positioned firmly within the “Golden Triangle” with immediate access to the M6/M1 interchange. One of the last major developments in the area was dominated by SEGRO at Rugby Gateway, completed in 2017. More recently Tritax Symmetry has commenced Symmetry Park Rugby with a number of pre lets to Iron Mountain.

Rents achieved are some of the highest in the Midlands market and developable land in the short term is reducing quickly, SEGRO Coventry Gateway being the primary opportunity alongside the Gigafactory at Coventry Airport as dedicated manufacturing.

Coventry has seen strong take up in recent years with some major landmark schemes achieving significant lettings. Most recently JP Morgan & Berictote have developed out the former Toys R Us site at Junction 2, whilst the SEGRO have kicked off the development of their Coventry Gateway site on the A46 with initial pre lets agreed.

Coventry has relatively high levels of unemployment and elementary occupations, levels of employment in manufacturing and transport tend to slightly lower than in other parts of the West Midlands. Whereas Rugby displays slightly higher than average levels of employment in transport and storage.”

- 2.23. The apportionment of employment land to opportunity area 7 within the WMSESS is based on a range of factors including access to the strategic highway network, the assessment of junctions, market insight on occupier demand, and analysis of access to labour.

- 2.24. Opportunity area 7 incorporates Coventry and Rugby and small parts of Nuneaton and Bedworth Borough and Warwick District. All junctions within the opportunity area lie wholly or partly within

Rugby Borough. Lack of available land at junctions means that (for the purposes of NPPF para 147(c)) there are no realistic non-Green Belt options for accommodating the residual large site need for area 7 within the neighbouring authorities of Coventry, Warwick or Nuneaton and Bedworth. Indeed, Coventry City Council is also unable to accommodate part of its non-large-site 'local' need as documented in the Memorandum of Understanding between Coventry and Warwickshire authorities.

- 2.25. Therefore, in considering reasonable alternatives to Green Belt release it is necessary to look within Rugby Borough at parts of the borough that lie beyond the Green Belt.
- 2.26. By reference to para 147(a) NPPF there are no options for meeting the need for large-scale employment sites on brownfield land. Similarly, for the purposes of NPPF para 147(b) in determining the quantum of employment land needed reasonable density assumptions have been applied with a plot ratio of 0.4 for smaller sites and 0.35 for larger sites as justified in the West Midlands Strategic Employment Sites Study (2024) and Coventry & Warwickshire HEDNA – WMSESS Alignment Paper (2024 and 2025 addendum).
- 2.27. The Green Belt within Rugby Borough is shown on the map on the next page. As can be seen, the extent of the Green Belt means that a Green Belt avoidance strategy for accommodating the area 7 large site need would mean all that need being delivered beyond the outer edge of the Green Belt to the north or south of Rugby.
- 2.28. NPPF paragraph 148 says plan makers should: “should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”. There are several reasons why avoiding the Green Belt and accommodating all the large employment site need for opportunity area 7 beyond the Green Belt is not a sustainable approach and therefore why exceptional circumstances exist justifying Green Belt release on the Coventry urban fringe. In summary:
  - 2.28.1. This would mean no large new employment sites at Coventry despite the city having a much larger labour force and need for new employment opportunities relative to Rugby.
  - 2.28.2. It would promote longer distance commuting.
  - 2.28.3. It would miss the greater opportunities for economic diversification and agglomeration and clustering at the edge of Coventry, together with other benefits the proposed Green Belt sites would deliver.
  - 2.28.4. Non-Green Belt site options face significant constraints.
- 2.29. These points are expanded upon below.







## The need for employment land at Coventry

- 2.30. There are immediate significant questions about whether an ‘all beyond the Green Belt’ approach would represent a sustainable strategy for new employment land given that the need is regionally derived and the opportunity area spans both Coventry and Rugby.
- 2.31. Within the opportunity area Coventry is by far the largest centre of labour with a 2021 working age population (16-64) of 225,200, compared to 71,700 for Rugby Borough of which 50,730 were within the Rugby built up area itself. The labour force of Coventry is therefore more than four times bigger than that of the town of Rugby.
- 2.32. Furthermore, the need for new employment opportunities in Coventry is greater than in Rugby. The modelled unemployment rate for Rugby Borough (April 2024-2025) was 2.8% (1,600 people) whereas for Coventry over the same period it was 4.8% (9,600 people). Similarly in July 2025 there were 13,660 persons claiming out-of-work benefits in Coventry compared to 2,085 in Rugby Borough. There are therefore six and a half times as many people out of work in Coventry than in Rugby Borough.
- 2.33. The greater need for new employment in Coventry was also shown in the 2025 Indices of Multiple Deprivation with Rugby Borough ranking as the 228<sup>th</sup> most deprived local authority in the country for scale of employment deprivation (this reflects the number of people experiencing employment deprivation) while Coventry was the 21<sup>st</sup> most deprived. On the scale of income deprivation domain Coventry was the 22<sup>nd</sup> most deprived authority and Rugby Borough the 221<sup>st</sup> most deprived.
- 2.34. The large size of Coventry’s workforce and its greater relative need for new job opportunities are strong arguments for accommodating a significant proportion of the area 7 employment land on the edge of Coventry.

## The commuting consequences of a beyond the Green Belt outer edge approach

- 2.35. The residual requirement for large employment sites in area 7 is (as set out above) for 310,711m<sup>2</sup> of industrial floorspace. This figure excludes Land at Crouner Fields Farm, which has planning permission, but it proposed to be allocated and removed from the Green Belt. It is possible to crudely estimate the workforce that 310,711m<sup>2</sup> of floorspace could require by applying the assumption in the WMSESS that 70% of the floorspace would be for B8 warehousing/distribution uses and 30% would be for B2 or research and development uses. The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA) provides estimated employment densities for these uses of 1 employee per 44sqm of B2 and 1 employee per 80sqm of B8. Thus the total estimated workforce would be 4,837.
- 2.36. Applying the same splits and ratios to the small site need for Rugby Borough gives a further future workforce of 3,412. That would be a combined 8,249 jobs by 2042. To contextualise that figure, Census 2021 workplace original destination data is impacted by higher home working rates during Covid, but showed 17,110 total employees both lived and worked at premises in Rugby Borough. It unrealistic to assume that all the new jobs would be staffed exclusively by residents of the borough, less still by residents of the town of Rugby.
- 2.37. This statement should be unsurprising, given that, as explained above, the origin of that need is

West Midlands-wide not indigenous to Rugby Borough. It is also not surprising given that, as outlined in the Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022, the functional economic market area and housing market area is Coventry and Warwickshire wide not just Rugby Borough. Looked at over those larger functional geographies there would be adequate workforce growth to accommodate projected employment growth over the plan period as set out in the Homes-Jobs Alignment Paper (Iceni Projects on behalf of Coventry and Warwickshire HMA authorities, 2025).

- 2.38. Therefore, large new employment sites in Rugby Borough would draw a significant proportion of their workforce from Coventry as the largest population and labour centre in the functional economic market area.
- 2.39. The need to draw in labour from elsewhere to staff employment land in Rugby is increased by competition for local labour from the large existing employment sites close to Rugby but outside of the borough, Magna Park in Harborough District in Leicestershire and the Daventry International Rail Freight Terminal (DIRFT) in West Northamptonshire.
- 2.40. DIRFT already employs more than 10,000 people (<https://www.westnorthants.gov.uk/news/prologis-uk-deliver-flagship-build-suit-facility-marks-spencer-dirft>) with this expected to grow. Magna Park is Europe's largest dedicated distribution park and is estimated, once complete, to accommodate 14,500-16,500 jobs on site (GLP figures). A further expansion to Magna Park is proposed in the Regulation 19 version of the Harborough District Local Plan which allocates land for 340,000m<sup>2</sup> of additional floorspace. If this were all to be used for distribution uses that would suggest more than a further 4,000 jobs.
- 2.41. These large existing sites mean there is already significant and growing competition for the limited labour pool at Rugby. This increases the need for developments to draw labour from further afield.
- 2.42. This is borne out by data provided by GLP the operators of Magna Park which shows that approximately 24% of its existing workforce comes from Leicester City Council's area (a straight line distance at closest of 9.5 miles from the Magna Park entrance and 30 minutes' drive away) compared to circa 9% from Harborough District (in which it is located) and 13% each from Rugby Borough and Hinckley and Bosworth Borough.
- 2.43. This means that if all the residual employment need were to be provided beyond the outer edge of the Green Belt and therefore approximately 7-10 miles (straight line distance) and a 20+ minute peak time drive from the edge of Coventry, this would create significant long-distance car commuting to these sites.
- 2.44. This in turn could be expected to create problems of 'rat-running' through villages and on country lanes which are already reported in many of the Borough's rural communities close to Magna Park.
- 2.45. Locating a significant proportion of the new employment land close to the Coventry urban fringe would minimise the need for this long-distance commuting. Furthermore, as is detailed below, the proposed Green Belt site allocations can deliver high quality cycling and convenient public transport links to a large workforce in Coventry that would be unachievable beyond the Green Belt.

## Diversification, agglomeration and clustering opportunities and other benefits of sites at the Coventry urban fringe sites

- 2.46. The Rugby Borough Council Economic Strategy 2025-2035 sets a long-term goal of “diversifying inward investment to ensure our ideal location for logistics and transport does not create an over-reliance on this sector” and out the need for “driving diversity” and creating “a resilience and diverse business base” while fostering a “high skill high pay economy”.
- 2.47. The need for diversification is illustrated by some statistics. Rugby Borough sits at within the so-called ‘Golden Triangle’ for distribution. This is an area of the East and West Midlands that has 35% of all UK warehouse floorspace. The Golden Triangle is favoured by transport and distribution businesses because it allows efficient access to large parts of the country via the motorway and rail network.
- 2.48. The Office for National Statistics ranked Rugby Borough as the local authority district in England and Wales with the highest proportion of business units used for transport and storage. Transport and storage made up 17.5% of business units in the borough in 2021.  
<https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/articles/theriseoftheukwarehouseandthegoldenlogisticstriangle/2022-04-11>
- 2.49. Nearby districts of North Northamptonshire (5), West Northamptonshire (7) and Nuneaton and Bedworth (15) also feature in the top twenty local authority districts with the highest proportion of business premises used for transport and storage.
- 2.50. The 2021 Census showed that 3.8% of people aged 16 years and over in employment in Rugby Borough worked in warehousing and support activities for transportation. This is the second highest proportion of any local authority district in England and Wales, after Spelthorne District which borders Heathrow Airport.
- 2.51. The WMSESS makes a number of statements which support the greater potential for manufacturing uses on the Coventry urban fringe in comparison to Rugby: “5.40 In most cases where labour is concentrated there is a poor supply of sites due to Green Belt – notably around the Birmingham conurbation. When making investment decisions the labour market is a key factor. Advanced / high-tech manufacturing will seek high quality graduates – for example universities or legacy areas such as Coventry, Warwick, and Birmingham south” and (5.51) in comparison to logistics users “Manufacturing sites are more likely to need enhanced access to labour markets, closer priority to urban areas and quality public transport.”.
- 2.52. The greater potential for diversification agglomeration and clustering at the Coventry urban fringe sites can also be seen by looking at the specific sites proposed for Green Belt release:
- Ansty Park North, site 14 for 75,000m<sup>2</sup> of floorspace (site area 36.94ha)
- 2.53. Ansty Park is a regional centre for science, technology and innovation occupiers. The redevelopment of the site was enabled by Advantage West Midlands, the West Midlands Regional Development Agency, and then its successor the Homes and Communities Agency (now Homes England). It houses since 2011 The Manufacturing Technology Centre (MTC) a research institute which is a joint venture between the University of Birmingham, Loughborough University and the University of Nottingham. It hosts the Advanced Manufacturing Training Centre supported by



Lloyds Bank. It is one of seven research and innovation centres in the country which form part of the High Value Manufacturing Catapult.

2.54. Notable other occupiers of Ansty Park include:

- 2.54.1. Rolls-Royce which operates a manufacturing facility
- 2.54.2. The head office of Cadent Gas, the largest gas distribution network in the UK
- 2.54.3. Meggitt PLC a defence and aerospace engineering company
- 2.54.4. FANUC a robotics research centre
- 2.54.5. Polestar an automotive engineering research centre
- 2.54.6. The London Electronic Vehicle Company head office
- 2.54.7. The High Temperature Research Centre a collaboration of Rolls Royce and University of Birmingham

2.55. This cluster of R&D and manufacturing uses has been supported by significant public investment, the creation of the MTC and the involvement of regional universities. It is a major asset to the regional economy and of national significance.

2.56. The proposed Green Belt change would allow expansion of Ansty Park to the north. It would be for further manufacturing and R&D uses.

2.57. A non-Green Belt location remote from this existing cluster could not deliver these uses and that would be to the detriment of the borough's economic goals and the wider regional economy.

2.58. Ansty Park is close to major centres of labour in Coventry. It is linked by existing cycle infrastructure on Central Boulevard and X30 buses linking to Coventry with 30 minute frequencies. Coventry City Council has a published long-term ambition to extend its proposed Very Light Rail to Ansty Park.

2.59. In combination exceptional circumstances clearly exist.

Walsgrave Hill, site 121 for 290,000m<sup>2</sup> of floorspace (site area 201.83ha)

2.60. The proposed new allocation, which would be removed from the Green Belt, lies between Ansty Park/Prospero Ansty and the edge of Coventry which includes the Cross Point Business Park.

2.61. As with the northern expansion to Ansty Park. the clustering benefits of the ecosystem of linked and complementary businesses and access to a high-skilled labour pool can't be replicated on sites beyond the outer edge of the Green Belt.

2.62. There are other additional benefits of the proposal at Walsgrave Hill which are not replicable on non-Green Belt sites. The proposal would deliver a 75 hectare publicly accessible country park as an expansion to Coombe Abbey Country Park. Both the scale of this country park and its strategic location adjacent the existing country park and close to a large population on the edge of Coventry, mean that this opportunity is not replicable elsewhere.

2.63. Cycle routes within the site can link directly to Ansty Park and University Hospital Coventry and Warwickshire (UHCW) via an upgraded route which is shown on the Warwickshire Local Cycling and Walking Infrastructure Plan as route CY05 under the heading "Coventry Connections". This

cycle and walking route can link to the planned Binley Cycleway within Coventry City Council's area which links the hospital to the city centre.

- 2.64. Walsgrave Hill would also deliver a blue light route into the hospital allowing ambulances to avoid congested roads. University Hospital Coventry and Warwickshire NHS Trust submitted a representation to the Regulation 18 consultation supporting the Walsgrave site based on its ability to deliver the blue light route.
- 2.65. The Walsgrave Hill site also has the potential to realise Coventry City Council's ambition to deliver its first very light rail (VLR) route between Coventry Railway Station and a park and ride at Ansty Park via UHCW. The proposed development at Walsgrave Hill shows a site for a tram depot which would serve this route and the safeguarding of a route for VLR through the site.
- 2.66. On the opposite side of the A46 from the site is Coventry City Council's allocated Walsgrave Hill Farm allocation for 900 new homes which would be accessible to the site by active travel.
- 2.67. The above opportunities for development near homes linked by high quality cycle and walking routes into Coventry and in future potentially by Very Light Rail to Coventry City Centre mean that the site can deliver sustainable transport links to a large urban centre that are beyond what can be delivered at non-Green Belt sites.
- 2.68. In combination these factors demonstrate exceptional circumstances for the release of the site.

Crowner Fields Farm and Home Farm, Hinckley Road, Ansty, site 95 for 275,000m<sup>2</sup> of floorspace, site area 112.18ha

- 2.69. This site has full planning permission dated 7 May 2025 (reference R23/1027) for the creation of an employment-led headquarters campus development composed of (amongst other things head office, distribution/warehouse facilities and concept research and development facilities. The applicant was Frasers Group plc.
- 2.70. The site was granted planning permission based on very special circumstances justifying development in the Green Belt. The officer's report to committee concluded:

“Overall, the totality of the economic, environmental and social benefits have been considered and the totality of the benefits clearly outweigh the combined weight of the harm to the Green Belt and any other harm, including the retail and landscape harm, heritage harm and harm in respect to the failure to satisfy the sequential test. Consequently, the very special circumstances necessary to justify the development do exist and the application should be approved.”
- 2.71. The economic benefits cited included 5,800 FTE jobs, £235-339 million in Gross Value Added (GVA) per year. This is equivalent to growing the Rugby economy by 10%. The development was also noted to provide 48ha of publicly accessible open space and enhancing the Home Farm Grasslands Local Wildlife Site.
- 2.72. The site would deliver cycle and pedestrian links to Ansty Park and hence to the wider network, together with to Ansty village and the Binley cycleway. A bus package would deliver a high quality public transport offer.

- 2.73. The wording of the proposed allocation of this site reflects the planning permission. This is a unique inward investment to the Borough of regional, even national significance. The very special circumstances for the grant of planning permission help establish the exceptional circumstances for Green Belt changes in the local plan.
- 2.74. The local plan seeks to achieve consistent, long-term defensible Green Belt boundaries.
- 2.75. With the existing and proposed large employment sites in the Green Belt proposed to be removed at Ansty Park, Prologis Park Ryton, Ansty Park North and Walsgrave Hill, removal of the Crowner Fields Farm site is a consistent approach.
- 2.76. Overall, there are exceptional circumstances for this change.

### Constraints at non-Green Belt sites

- 2.77. Notwithstanding the compelling economic and sustainability case for Green Belt release, as detailed above, it is necessary to demonstrate that other reasonable options for meeting the employment need have been fully examined.
- 2.78. The process for the assessment of sites is detailed in the Spatial Strategy and Site Selection Methodology Summary. A long-list of site options drawn from a range of sources including a 'call for sites' was subject to desk-based assessment through the Housing and Economic Land Availability Assessment (HELAA). Sites assessed through that process as available, achievable and potentially suitable were subject to a stage 2 site assessment process.
- 2.79. The stage 2 site assessment included site visits to all sites, landscape sensitivity assessment, ecological constraints assessment (where the potential for ecology constraints was identified) and heritage assessment (again where the potential for constraints was identified). Site options were also subject to accessibility analysis.
- 2.80. Alongside the stage 2 site assessment the Sustainability Appraisal report considers reasonable alternative growth options. To be reasonable options for large scale employment land sites need immediate access onto the strategic road network as the absence of such access would mean inappropriate routing of commercial vehicles on minor roads. This limits the realistic pool of sites available.
- 2.81. The principal non-Green Belt employment land site options identified are:
- 2.81.1. Site 18 Barnwell Farm, Thurlaston with potential to accommodate 96,720m<sup>2</sup> of floorspace
  - 2.81.2. Site 130 Land north of Houlton with potential to accommodate 320,662m<sup>2</sup> of floorspace
  - 2.81.3. Site 133 Land north of M45 with potential to accommodate 34,620m<sup>2</sup> of floorspace
  - 2.81.4. Site 325 Land adjacent to Magna Park with potential to accommodate up to 583,175m<sup>2</sup> of floorspace
- 2.82. As site 95 already has planning permission, the new floorspace proposed to be allocated through the plan in the Green Belt, at sites 121 and 14 total 365,000m<sup>2</sup>. Hence it is clear that there is non-Green Belt land available that could accommodate this quantum of floorspace. The basis of the exceptional circumstances case is therefore not the absence of non-Green Belt options.
- 2.83. Instead, the exceptional circumstances case is based on the economic and sustainability

advantages of the Green Belt site options, together with the disadvantages of the non-Green Belt options. The disadvantages of the principal non-Green Belt options are summarised in turn below.

Magna Park (site 325)

- 2.84. The size of the land promoted at Magna Park means that this could, if allocated, remove the need for Green Belt employment allocations.
- 2.85. Disadvantages of the non-Green Belt options have been touched on above in the context of the discussion of commuting patterns. These concerns are particularly acute in relation to Magna Park given that site is removed from both Rugby and Coventry and draws 57% of its current workforce from Leicestershire per data provided by Magna Park owner GLP.
- 2.86. Allocating a large employment site at Magna Park rather than the proposed Green Belt allocations close to Coventry would give rise to significant long-distance car commuting from Leicester, Coventry, Nuneaton, Hinckley and Rugby. The need for commuting from this wider labour catchment would be increased by the existing proposals to expand Magna Park included in the Harborough District Regulation 19 Local Plan.
- 2.87. The consequences of the further expansion of Magna Park in Rugby Borough for the highway network are discussed in the Strategic Transport Assessment which states:
- “4.7 Based on the trip generation and assignment for the Land Adjacent Magna Park site, it is clear that significant development trip volumes are expected at the A5/Cross in Hand roundabout. There is a predicted to be a particularly large increase in flows on the Coventry Road approach.
- 4.8 A significant amount of the trips to/from this site are predicted to route through the A426/A5 Gibbet Hill Roundabout. Given the capacity constraints that already exist at this junction, it is likely that the volume of additional traffic that this site would create at this roundabout would exacerbate the significant congestion issues identified at this location. (...)
- 4.9 Considering the existing constraints, the lack of realistic cycling and walking opportunities, and limited bus service provision, combined with the significant trip generation predicted for this site, it is likely that there would be highway capacity issues associated with delivering this site which would be difficult to mitigate against and, unlike the other developments which have been considered through the STA, this site would also require a solution for the issues observed at the Gibbet Hill junction to be identified and delivered to provide confidence that the development impacts can be managed. This dependency could pose a significant constraint to the site coming forward..”
- 2.88. The operators of Magna Park, GLP, have a track record of delivering bus provision for staff. However, the distances involved mean this would not be as convenient as for sites close to the edge of Coventry and, in contrast to those locations, active travel would not be possible.
- 2.89. The NPPF advises that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (para 110). Further expansion of Manga Park would not be compatible with this objective.
- 2.90. At present, Magna Park is restricted by its planning permissions to being a B8 storage and

distribution location. The site promoter has indicated that there is considerable scope and occupier interest in moving away from this and hosting more B2 or research and development uses in an expanded park. However it is not realistic for Magna Park will be able to deliver the same diversity and growth in advanced manufacturing and research and development uses that could be delivered by the proposed allocations at Ansty Park and Walsgrave Hill, for the following reasons:

- 2.90.1. The WMSESS emphasises the importance to manufacturers of access to larger urban labour pools from which Magna Park is distant.
- 2.90.2. Magna Park lacks the proximity to Coventry and Warwick universities and their graduate labour pool.
- 2.90.3. As the park at present is a logistics location, there are not the opportunities for clustering and synergies that exist on the edge of Coventry given the presence of existing important manufacturers and research institutes there, particularly in the automotive industry.

#### Thurlaston (sites 18 and 133)

- 2.91. This option comprises two sites, sites 18 and 133. The scale of these sites means that they couldn't together entirely remove the need for Green Belt allocations, however they could reduce the scale of Green Belt release.
- 2.92. In contrast to Magna Park, these sites are much closer to the Rugby urban area. Nonetheless, for the reasons outlined above, concentration of the Opportunity Area 7 employment need at Rugby would be likely to give rise to longer distance commuting.
- 2.93. Thurlaston is not in a location with an established manufacturing and R&D presence and so would be unlikely to deliver these uses on the scale of the proposed Green Belt allocations. The scale of the sites could lend itself to the provision of a mix of unit sizes, providing opportunities for SMEs and thereby fostering diversification.
- 2.94. There are significant concerns with the Thurlaston sites in terms of their relationship with the large South West Rugby employment and residential allocation to the north. The Local Plan proposes a separation area between South West Rugby and the villages of Dunchurch and Thurlaston to maintain their distinct identities. The proposed Thurlaston employment sites, particularly site 133, would fill a significant part of that gap.
- 2.95. The relationship with the South West Rugby allocation also raises concern in terms of cumulative impact on the transport network as detailed in the Strategic Transport Assessment as follows:

“Considering the above existing and forthcoming constraints in this area, combined with the lack of realistic cycling and walking opportunities, and limited bus service provision, it is likely that there would be highway capacity issues associated with delivering this site which would be difficult to mitigate.”
- 2.96. Site 18 also raises significant issues in terms of its relationship with the Thurlaston Conservation Area as detailed in the heritage assessment prepared as part of the stage 2 site assessment. The assessment states: “Potential impacts of development include the intrusion of highly prominent

commercial forms of development into the historic landscape surrounding to Thurlaston, featuring within outward views and key approach/departure experiences to/from the historic settlement. The level of potential harm would depend on location, scale and type of buildings, but large-scale commercial development in the eastern half of the site is considered to be of elevated potential to create significant impacts.”.

#### North of Houlton (site 130)

2.97. The scale of the site north of Houlton means that it could substitute for the Green Belt allocations. As with the sites at Thurlaston it is more proximate to the Rugby urban area, its proximity to the Houlton urban expansion and to the proposed Rugby Parkway railway station mean that there are opportunities for active travel and public transport.

2.98. The site would not be an expansion of an existing employment site, as with the proposed Green Belt allocations (save for Crowner Fields Farm), with its neighbouring uses being agricultural, residential and a truck stop. The Daventry International Rail Freight Terminal, a very large logistics location, is close by.

2.99. As with Magna Park, the location at North of Houlton lacks the proximity to existing manufacturers and research institutes, universities and labour pools in comparison to the Green Belt sites. Opportunities for research and development and manufacturing uses are therefore likely to be less.

2.100. Concerns about commuting patterns, through concentrating employment uses at Rugby also arise, as detailed above. The Strategic Transport Assessment modelling of the site reached the following conclusions:

“8.72 (...) the inclusion of this site does result in residual queue impacts at junctions on the A5, south of the site, and also at key junctions on the A426 Leicester Road corridor.

8.73 Although some of these impacts could be reduced through signal timing optimisation, the more significant queue impacts at M6 Junction 1 and the A426/Brownsover Road roundabout suggest that further investigation may be required to support the development.

8.74 It is also clear from the distribution assumptions and resultant impact assessment, that this site is dependent on the delivery of a scheme at the A426/A5 Gibbet Hill junction, which increases the risk associated with the delivery of this site.”

2.101. A scheme for the A426/A5 Gibbet Hill junction is currently within the National Highways Project Control Framework (PCF) stage 1 (options identification). This is expected to conclude in 2025. It is then up to Department for Transport to decide whether options can progress to PCF Stage 2 (option selection). National Highways have indicated that if the scheme were to enter PCF stage 2 this would take until the end of 2027. It is only at the end of this stage that a preferred scheme would be identified.

2.102. Following that would be Stage 3 (preliminary design) and stage 4 (statutory procedures and powers, if required) and stage 5 (detailed design). This stage may take 2-5 years to complete depending upon the complexity of the preferred scheme. It is only at the end of stages 3-5 (the development stage) that DfT takes the final decision as to whether to fund the project.



- 2.103. Therefore, for the moment there remains significant uncertainty about whether a scheme for Gibbett Hill will take place and this will remain the case if the scheme proceeds to PCF stage 2 in 2026. Delivery of a scheme would not be until the early 2030s and so a development north of Houlton would not be able to proceed until then. The risk of non-delivery or late delivery of a National Highways scheme for Gibbet Hill is a consideration in assessing the desirability of the North of Houlton as a proposed allocation.
- 2.104. Importantly, this contrasts with the position for the Walsgrave Junction scheme on the edge of Coventry which is required to deliver the proposed Green Belt allocation at Walsgrave Hill. That scheme is now at the development consent order decision stage with the examination having been completed and the examining authority's recommendation sent to the Secretary of State. National Highways states that if the Development Consent Order is made it would expect to start construction in late 2026.
- 2.105. There is also a significant heritage constraint affecting land north of Houlton. The heritage assessment prepared as part of the stage 2 site assessment notes that Grade II listed Dunsmore House is immediately to the north of the site and the historic parkland associated with it forms part of the site. The assessment concludes that: "given the site's topography and the likely scale of buildings associated to an employment use, we consider that it is unlikely that heritage harm could be wholly avoided, and possible that such harm could remain at a high-level despite mitigation".
- 2.106. It should be noted that significant heritage constraints also exist for the proposed allocation at Walsgrave Hill, in particular affecting the Grade II\* listed Combe Abbey Registered Park and Garden. However, there appears to be greater potential to mitigate the impact on Combe Abbey by shifting development further away from its edge.

### Summary

- 2.107. The above summarises the full examination of all reasonable alternatives to Green Belt allocation for meeting the need for employment land. More detail is set out in the HELAA, Stage 2 site assessment and supporting technical reports, in the Strategic Transport Assessment and in the Sustainability Appraisal report. Overall, there are significant disbenefits and constraints affecting the non-Green Belt options for accommodating the need for employment land and these add to the exceptional circumstances for the proposed Green Belt allocations.

## HOUSING ALLOCATIONS

- 2.108. Green Belt housing allocations are proposed at the Green Belt villages of Binley Woods, Brinklow, Long Lawford, Ryton-on-Dunsmore, Stretton-on-Dunsmore, Wolston and Wolvey. The list of Green Belt allocations is as follows:

316	Land at Long Lawford	400
253	Lawford Fields Farm	250
6	Land E of Fosse Way, Stretton-on-Dunsmore	3
81	Land west of Fosse Way, Stretton-on-Dunsmore	40
348	The Croft, Stretton-on-Dunsmore	70

337	West Farm and Home Farm, Brinklow	75
315	Land south of Rugby Rd, Brinklow	250
39	Dyers Lane, Wolston	15
136	North of Warwick Rd, Wolston	80
54	Oakdale Nursery, Binley Woods	43
358	Coventry Road, Wolvey (smaller cut)	60
309	Land North of B4109, Wolvey	150
	total	1436

2.109. The combined number of dwellings that would be allocated on land removed from the Green Belt would be 1,436. All of the villages where allocations are proposed are inset from the Green Belt rather than washed over. The proposed allocations would extend the inset area.

2.110. As with the exceptional circumstances case for employment land, the case for housing is based on a range of factors in combination. The factors that support the exceptional circumstances case for the proposed housing allocations fall into two main categories. First, the sustainability and other benefits of the proposed Green Belt allocations. Second, the examination of all other reasonable options to Green Belt allocation and the reasons for rejecting them.

### The benefits of the proposed Green Belt allocations

#### Affordable housing delivery

2.111. There is a significant need for affordable housing in the borough. This is shown by the Updated Housing Needs Evidence for Rugby Borough (Iceni, September 2025). Total need is estimated at 474 per year (this includes those able to rent but not buy). The need reduces to 202 homes per year if existing households who are already in homes are excluded. 202 homes would be 32% of overall housing need under the standard method.

2.112. Affordable housing delivery in the period 2019/20 to 2023-24 made up 20% of overall housing completions.

2.113. The relatively low proportional delivery of affordable housing in the past five years is in part due to Houlton. Houlton is an urban extension to Rugby which will eventually comprise 6,200 homes. The s106 agreement for Houlton dated 21 May 2014 and varied on 25 May 2017, 28 June 2017 and 20 December 2019 provided for 0% affordable housing for the first 350 dwellings and then 10% affordable housing for the remaining dwellings in the first key phase. Subsequent key phases were to be subject to viability review. It is understood that viability reviews to date have not demonstrated an ability to deliver further affordable housing.

2.114. Although at the time of writing outline applications for the largest parts of the South West Rugby site allocation of 4,000 homes remain to be determined, the position appears likely to be similar there. A viability note prepared by the council's consultants BNP Paribas as evidence to support the preparation of the updated South West Rugby Masterplan SPD in October 2024 suggested a site-wide ability to viably deliver 2% affordable housing based on then current values and assessed infrastructure costs. It is understood that the outline applications currently awaiting determination for the largest parcels on the site propose 0% affordable housing on viability grounds.

2.115. Houlton and South West Rugby are projected to deliver a combined 6,565 homes between 2025

and 2042, 60% of the plan target. If little or no affordable housing is delivered on these sites, as seems likely, then the delivery of affordable housing within the borough will inevitably fall below targets.

- 2.116. It is also likely that housing delivery on brownfield sites in the Rugby urban area will struggle to deliver high percentages of affordable housing. The Reg 19 Local Plan sets a target of 20% affordable housing in the Rugby urban area based on evidence in the Viability Assessment. The plan allocates 703 homes in the urban area, 6.5% of the total. Finally, 8% of the housing need is likely to come forward on small site windfall sites of fewer than five homes. These sites do not provide affordable housing.
- 2.117. When Houlton, South West Rugby, urban brownfield sites and small site windfalls are taken together, they make up 74.5% of total new homes planned 2025-2042. If, as is likely, less than 20% affordable housing delivered on these sites, it increases the importance of maximising affordable housing delivery on the remaining sites. Sites at villages are best able to do that.
- 2.118. The viability assessment shows that Green Belt villages have the highest values in the borough and therefore the ability to deliver higher proportions of affordable housing. The application of the NPPF's 'golden rules' will further optimise this percentage to 40%. Together, the Green Belt allocations would deliver circa 500 affordable homes during the plan period to 2042. A strategic site at Lodge Farm (discussed below) would be based on the viability assessment, if it were able to proceed at all, deliver 0% affordable housing.

#### Village sustainability

- 2.119. In 2021 the median age of a resident of the main built up areas in Rugby was as follows:

Location	Type	Median age
Rugby	Main urban area	39
Cawston (Rugby)	Suburb of Rugby	34
Clifton Upon Dunsmore	Non-Green Belt village	50
Dunchurch	Non-Green Belt village	46
Binley Woods	Green Belt village	51
Brinklow	Green Belt village	52
Long Lawford	Green Belt village	35
Ryton-on-Dunsmore	Green Belt village	45
Stretton-on-Dunsmore	Green Belt village	50
Wolston	Green Belt village	44
Wolvey	Green Belt village	52

- 2.120. As can be seen, except for Long Lawford which is close to Rugby and has similarities to the town, the median age of residents in Green Belt villages is considerably older than for the town.
- 2.121. One reason for this may be house prices. The interim Viability Study produced at preferred options stage stated "values in the rural areas of the Borough are highest, with significantly lower values in the Rugby Urban Area".
- 2.122. Another reason is the proportionately low level of house building in rural areas. Under the Local Plan 2011-2031, 490 homes were allocated at Green Belt villages, compared to 13,300 in urban

extensions to Rugby. No allocations were made in non-Green Belt villages. Overall, 4% of housing allocated in the Local Plan 2011-2031 was planned to be delivered in rural areas despite 27% of the borough's population living in the rural areas in 2011.

2.123. By contrast, the level of housing proposed to be allocated in Green Belt villages in the new local plan is more in line with their share of the borough's total population. The population of the borough in 2021 was 114,400. Of this population, 84,590 (74%) lived in the Rugby built up area (including Cawston) with the remaining 26% living in rural areas. Of the rural population, a combined 3,730 lived in the non-Green Belt villages of Dunchurch, Clifton Upon Dunsmore. The larger Green Belt villages of Long Lawford (4,370), Wolston (2,695), Binley Woods (2,570), Wolvey (920), Brinklow (1,120), Ryton-on-Dunsmore (1,830), Stretton-on-Dunsmore (1,175) combine for a population of 14,680. That equates to 80% of the population of the main rural settlements. When smaller Green Belt villages like Pailton (485), Shilton (285), Marton (190), Willoughby (410), Stretton-on-Fosse (425) are added, the population living in Green Belt villages increases to 16,475, 14% of the borough's total population. All these figures derive from ONS Census 2021 built up area statistics. The proposed new allocation at Green Belt villages, 1,436 homes, equates to 13% of baseline housing need and 12% of total planned supply including buffer. Therefore, the overall proposed new housing in Green Belt areas is proportionate to its existing population share of those areas.

2.124. New housing in Green Belt villages can be expected to bring the following benefits to village sustainability:

2.124.1. Provide opportunities for younger people to move to these areas.

2.124.2. Provide affordable housing options in what are generally expensive areas.

2.124.3. Provide more local spending power to support local businesses.

2.124.4. Enhance the sustainability of existing rural bus services and in some cases support service upgrades.

2.124.5. Ensure the sustainability of rural primary schools.

2.125. The latter point is important in Long Lawford where the school is projected to be considerably below capacity. Long Lawford is the location with the largest proposed Green Belt housing allocation, for 650 homes. The other benefits that provide justification for a larger scale of new housing at this village are:

2.125.1. Its close proximity to and good public transport links with Rugby.

2.125.2. The potential for larger-scale new development at the village can deliver a new shop and a new safe walking and cycling route between the village and Bilton secondary school.

2.125.3. The delivery of significant new public recreation uses potentially to comprise sport pitches.

2.125.4. The low assessed landscape sensitivity of the proposed site allocations.

2.126. Overall, the sustainability benefits of delivering housing in the Green Belt main rural settlements support the exceptional circumstances case.

#### Diversifying and speeding up housing delivery

2.127. As can be seen above, housing delivery in Rugby Borough has been concentrated on large urban

extensions to Rugby.

- 2.128. This has led to limited diversity in the types of homes being delivered, the locations in which they are built, in the tenure of homes being delivered (in view of the viability challenges detailed above) and in the builders building them (dominated by the large volume housebuilders).
- 2.129. Delivery challenges at South West Rugby mean that land parcels projected in the Local Plan 2011-2031 Appendix 2 housing trajectory to be starting to deliver completions on site between 2020 and 2023 are now projected to first see completions between 2026 and 2031. This 6-8 year slippage has resulted in the Council being unable to demonstrate a five year housing land supply.
- 2.130. Going forward, with 60% of the housing requirement to 2042 (56% of total supply) being delivered at the two large sites of Houlton and South West Rugby, the future housing supply is vulnerable to timetable slippage and/or sales dips on those sites. This risk is intensified by the fact that Houlton is controlled by a single master developer that will reasonably manage the release of parcels to maximise its return, and by the fact that South West Rugby is controlled by a limited number of landowner/developers.
- 2.131. This means to boost delivery in the short term and deliver a more resilient housing supply the Council needs to:
- 2.132. Diversify the range of locations in which houses are being built to include other options beyond edge-of-Rugby large urban expansions. This will need to include more units in the urban area but also more opportunities in rural areas. Diversifying locations will also diversify the type of homes built. In combination this will tap a deeper market of buyers with a greater range of housing preferences. This in turn will drive sustained delivery.
- 2.133. Bring forward smaller and medium-sized sites which can come forward more quickly to plug the five year supply shortfall. Smaller sized sites will also support diversification in the range of builders building in the borough. It will create more opportunities for SME builders and registered providers to acquire sites.
- 2.134. Diversify the tenure of homes being built by delivering affordable housing. The importance of this is discussed above, but delivering more affordable housing increases the resilience of the housing supply in periods when conditions are less favourable in the sales market.
- 2.135. The need to do these things is emphasised in national policy as set out in the National Planning Policy Framework (NPPF) which, at paragraph 61 states “To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”. Furthermore, the NPPF at paragraph 78 requires local authorities to identify and maintain a five year supply of specific deliverable sites measured against their requirements. This is required on plan adoption and needs to be maintained on a rolling basis.
- 2.136. Housing delivery is monitored at national level through the housing delivery test. The consequences of falling behind on delivery and/or supply are the presumption in favour of sustainable development in paragraph 11 applies. This leads to local plan policies being overridden and unplanned development being approved.

- 2.137. In view of the limited alternatives outside the Green Belt for diversifying supply as detailed below, Green Belt allocations are needed to support resilient housing delivery through the plan period.
- 2.138. Under s19(2)(a) of the Planning and Compulsory Purchase Act 2004 in preparing local development documents local planning authorities are required to have regard to amongst other things “national policies and advice contained in guidance issued by the Secretary of State”. In this context it is important to note that the then secretary of state wrote on 30 July 2024 to all local authority leaders and chief executives in England stating the government’s commitment to build 1.5 million homes in the period 2024-2029 and emphasising the need for urgent action to address what she described as “the depth of the housing crisis in which we find ourselves as a nation”. The urgency emphasised by government increases the importance of boosting the delivery of homes in the short term. This is a goal which the proposed Green Belt allocations would support. The contribution those sites would make to delivery in the short to medium term is an important part of the exceptional circumstances case for Green Belt release.

### Examining all other reasonable options to Green Belt allocation

- 2.139. Considering first NPPF paragraph 147(a), the council has sought to use as much brownfield land as possible. This is demonstrated through the Urban Capacity Study. The council is seeking for the purposes of para 147(b) seeks to optimise realistic densities on those brownfields sites that are identified without undermining place-making and quality. It is important to note that the challenging development viability of building apartments in Rugby as evidenced by the Whole Plan Viability Study means that high-rise development is not realistic.
- 2.140. Turning to paragraph 147(c) any options to meet Rugby Borough’s housing need outside of the borough would need, logically, to be within the same functional housing market area (i.e. Coventry and Warwickshire). Seeking to move the borough’s housing needs outside of the housing market area into Leicestershire or Northamptonshire is not considered to be a reasonable option and so is not considered further.
- 2.141. Within the housing market area:
- 2.141.1. Coventry City Council is an urban authority tightly bound by Green Belt. There are no non-Green Belt options for meeting Rugby Borough’s housing need in Coventry.
- 2.141.2. Warwick District and Stratford on Avon District include areas beyond the outer edge of the West Midlands Green Belt, but are seeking to meet their own very significant housing needs which are considerably higher than Rugby Borough’s. In doing so the south Warwickshire districts are considering the need to remove land from the Green Belt. It is highly unlikely that south Warwickshire authorities would be able to accommodate any of Rugby Borough’s housing need.
- 2.142. Finally, in the north of the county are Nuneaton and Bedworth and North Warwickshire boroughs. Nuneaton and Bedworth’s local plan is at the time of writing just been adopted. The borough is largely urban with very limited non-Green Belt land. It is unlikely that Nuneaton and Bedworth Borough council accommodate unmet need from Rugby Borough.
- 2.143. North Warwickshire Borough is less Green Belt constrained. However the most recent



published housing delivery test measurement demonstrates that the borough has been struggling to deliver its current local plan's housing requirement. This is understood to be in part due to difficulties securing infrastructure upgrades on the A5 needed to support housing delivery, including the announcement of the scrapping of the A5 Dordon to Atherstone scheme. North Warwickshire Borough is not a neighbouring authority and it lies both within both the Greater Birmingham and Black Country Housing Market Area as well as the Coventry and Warwickshire Housing Market Area. It is likely that North Warwickshire will face calls to meet unmet need from Birmingham and therefore seeking to move housing need to North Warwickshire from Rugby Borough is not a reasonable option.

2.144. Overall, given that there are not further opportunities for use of brownfield land or urban intensification nor opportunities to export need to neighbouring authorities, the remainder of this section considers non-Green Belt but greenfield options for meeting need in Rugby Borough.

2.145. Non-Green Belt options in Rugby Borough comprise the southern and eastern edges of the town of Rugby together with the villages of Dunchurch, Clifton Upon Dunsmore and Newton. Smaller villages and hamlets in the rural south of the borough are not considered to be reasonable options on sustainability grounds. However, a new settlement proposal at Lodge Farm on the A45 between Dunchurch and Daventry is a potentially reasonable option. These non-Green Belt options are considered in the next sections.

#### Non-Green Belt options at Rugby

2.146. Considering first Rugby, the existing (carried forward) urban extensions at Houlton, South West Rugby, Eden Park and Ashlawn Gardens are expected to deliver a combined 7,279 homes during the plan period. New greenfield allocations at Rugby through the local plan would deliver a further 535 homes.

2.147. As detailed in the Stage 2 site assessment report and Sustainability Appraisal report, further land was put forward to allocation at Inlands Farm (site 91), Kilsby Lane (site 40) and Barby Lane (sites 16 and 334). These sites were not supported in view of the landscape harm that would arise in an area that is proposed to be designated in the plan as a landscape of elevated sensitivity. Additionally, the sites lie near the Houlton and South West Rugby/Ashlawn Gardens urban extensions. The volume of existing recent and planned development in these areas means that further concentration on Rugby's non-Green Belt southern urban edge is not considered to be reasonable. These options are considered in more detail in the Sustainability Appraisal report.

2.148. Some comments received in response to the Regulation 18 consultation argued that the greenfield employment allocations planned at Rugby at Coton Park East (site 64) and South West Rugby employment phase 2 (site 17) should instead be allocated for residential development. Coton Park East was allocated in the Local Plan 2011-2031 adopted 2019 for housing but has not come forward. It is now promoted for employment use by an employment developer. Residential use of the site has not proved deliverable, and the site is not now available for that purpose. Advice from the Planning Inspectorate at the advisory visit stage on 17 June 2025 from Inspector Mike Worden was that:

"If the Council were to seek to allocate land for a use for which the landowner had indicated it was not available, it would need to present clear evidence that the site could be delivered. This would likely need to include a willingness to use compulsory purchase powers and funding. It will be up

to the Council to present evidence to support its case.”

- 2.149. In view of the existence of other alternatives to meet the need for housing, it is not considered that compulsory purchase of land at Coton Park East for this purpose would be a reasonable or realistic option.
- 2.150. Furthermore, the Coton Park East site’s location close to M6 junction 1 and accessed through existing employment land makes it more suitable for employment use than for residential.
- 2.151. Similar considerations apply at the South West Rugby employment phase 2 (site 17). This land is owned by and promoted for employment use by an employment developer and is not being made available for residential development. The site represents a favourable location for employment use given its proximity to the M45/A45 junction and the existing phase 1 employment land which has already delivered access upgrades.
- 2.152. Given the scale of the completed employment buildings to the south and the need to maintain separation from the ancient woodland to the north, the suitability of the site for residential development is now questionable. Creating a successful interface with both the existing employment land and the woodland would be challenging for a residential proposal.
- 2.153. Reasonable employment options at Rugby town would optimally be at M6 Junction 1 or the M45/A45 junction as the two main junctions of the SRN that serve the town. Therefore, Coton park East and South West Rugby employment phase 2 are the best non-Green Belt options for accommodating employment land at Rugby town. As detailed above, other non-Green Belt locations for employment land close to Rugby at Thurlaston and North of Houlton are problematic. Seeking to allocate Coton Park East and/or the South West Rugby sites for residential would simply displace employment land away from the town of Rugby to Magna Park or – given the sustainability drawbacks of that option as discussed above – more likely into the Green Belt.
- 2.154. Deleting the main employment land allocations at Rugby town would not be consistent with the borough’s Economic Strategy in that it would limit opportunities for economic growth at the town. It would also not reduce the need for Green Belt release because it would displace employment land into the Green Belt rather than residential.

#### Non-Green Belt options at Dunchurch and Clifton Upon Dunsmore

- 2.155. At Dunchurch no further allocations are proposed given the South West Rugby development proposed at the edge of the village. A further 150 are planned at Clifton Upon Dunsmore. At both villages Warwickshire County Council as Local Education Authority advised that the number of new dwellings should be limited to reduce the need for bussing children to primary school. The proposed allocations at Clifton upon Dunsmore adhere to that county council advice.
- 2.156. There are further reasons to eschew more land allocations at Dunchurch and Clifton upon Dunsmore. Both villages are close to Rugby and areas of separation are proposed in the plan to preserve the separate identities of the villages. Sites proposed in those separation areas, including site 42 (at Dunchurch) and 334 and 335 (Clifton Upon Dunsmore), are not considered reasonable options.
- 2.157. In the case of Dunchurch, the scale of development on the village’s doorstep through the 4,000

home South West Rugby urban extension means that additional housing beyond this is not considered to be a good option.

- 2.158. Overconcentrating growth at Dunchurch and Clifton Upon Dunsmore, which collectively only make up 20% of the population living in the main rural settlements, simply because they are beyond the outer edge of the Green Belt, would not represent a sustainable pattern of development.

#### Lodge Farm

- 2.159. Site 73 Lodge Farm on the A45 between Dunchurch and Daventry is proposed for a greenfield, non-Green Belt new village of ultimately 2,680 dwellings of which an estimated 1,088 would be deliverable by 2042. Based on Lichfields' *Start to Finish* research, cautious assumptions need to be made about the lead time from allocation to first completions on a very large site like Lodge Farm and in relation to the rate of annual completions that can be delivered when the site is underway. The assumptions made for the trajectory for Lodge Farm are considered realistic.
- 2.160. The allocation of Lodge Farm would not remove the need for Green Belt allocations, but could reduce the scale of Green Belt allocation needed considerably. The reduction would not be as much as 1,088 dwellings because the need to be able to demonstrate a five year housing land supply in the first ten years of the plan period would necessitate retaining more quickly deliverable small and medium site allocations.
- 2.161. The need to diversity the borough's housing supply as outlined above, and the fact that 60% of the housing requirement will be delivered through two very large sites, decrease the argument for a further large site like Lodge Farm. Lodge Farm would deliver little resilience if delivery at South West Rugby or Houlton were to slip backwards or slow-down in the first ten years of the plan period.
- 2.162. Nonetheless, Lodge Farm needs to be fully examined under paragraph 147 NPPF before it can be concluded that exceptional circumstances exist.
- 2.163. To aide that full examination, Lodge Farm has been modelled in the Strategic Transport Assessment and has been specifically viability tested in the Whole Plan Viability Study.
- 2.164. The Strategic Transport Assessment's findings on the site are as follows:

"The analysis has indicated that the inclusion of the Lodge Farm site would require a significant amount of additional highway infrastructure at the following locations as a minimum:

- A45/M45 Thurlaston Interchange [significant upgrades]
- Dunchurch Crossroads [20mph speed limit and traffic calming through Dunchurch, right turn banned]
- A5/A428 Halfway House Roundabout [further widening].

Should highway schemes be delivered at the above locations, along with the downgrading of the B4429 through Dunchurch, then the impacts modelled indicate that the Lodge Farm site could be included within the model network, as part of the emerging plan, without significant worsening of the network performance.

However, it should be noted that the schemes are likely to be significant, which may effect the viability of these development proposals, furthermore, it is not considered desirable to increase traffic volumes at Dunchurch Crossroads given that this is a location which is recognised to suffer from congestion and capacity issues currently

Some of these issues will be alleviated by the delivery of the Homestead Farm Link Road, as part of the SW Rugby proposals, the additional traffic generation associated with Lodge Farm could erode these potential benefits. Further work would be required to demonstrate that the effects of the development traffic in this area could be managed effectively and without significant adverse impact on the operation of the transport network should this site come forward."

- 2.165. Warwickshire County Council highway officers have indicated that they would not support the proposed downgrading of the B4429 through Dunchurch or the ban on right turns at Dunchurch crossroads. WCC does not think traffic calming or speed limit reduction would be appropriate given that the road provides a locally strategic connection between A45 south towards Daventry (designated as part of the Major Road Network) and Rugby via the A426. Similarly, the county council have expressed concerns that banning right turns at Dunchurch crossroads would increase traffic demands on the realigned B4429 Coventry Road north westbound approach to the Homestead Link Road junction (which is already anticipated to operate above theoretical capacity) as well as increasing traffic to the A45/M45 Thurlaston Interchange, A45/B4453 Blue Boar Interchange and on rural routes at Longtown Land and The Ridgeway.
- 2.166. The absence of a workable mitigation proposal at Dunchurch Crossroads increases concerns about traffic impact in this location.
- 2.167. Lodge Farm was included in the Rugby Borough Local Plan 2011-2031 as a proposal for 1,500 dwellings. In the report on the Local Plan examination dated 27 March 2019 Inspector Mike Hayden concluded that the site was not justified or effective or consistent with national policy on the delivery of sustainable development and so proposed main modifications to delete the allocation. Inspector Hayden stated "In conclusion, the allocation would have relatively poor accessibility, particularly by non-car modes and in comparison with the other large scale allocations in the Plan. It would also be likely to have significant adverse effects on the landscape, again to a greater degree than is likely with the other allocations of comparable size, and cause less than substantial harm to the significance of heritage assets."
- 2.168. To respond to these concerns, the proposal has increased in size to 2,680 dwellings, a secondary school is proposed and a £10 million bus/travel planning package is proposed.
- 2.169. Given the site's location remote from existing urban areas, the position of the council has been that a secondary school would need to be provided on sustainability grounds to address Inspector Hayden's concerns. The scale of the site would not support a secondary school on its own and so it is expected that a school would attract pupils from a wider catchment. The effect of providing a school on the highways impact is considered in the STA, which comments as follows:

"...The queue impacts presented in the previous two figures indicate that there are impacts associated with the delivery of the school, on top of the omission site itself, with additional queues now reported at the A426 corridor through Dunchurch, and to the north of the A426/Ashlawn Road roundabout, whereby there are predicted queue increases of over 25 vehicles during the AM and PM peak hours. During the PM peak hour, an additional impact is also reported at the Daventry

Road/Ridgeway junction.

The additional impacts on the A426 route are expected given the distribution of traffic to/from the site, and particularly during the AM period, where the modelling has assumed a large amount of external site traffic will be generated by the school, given the size of the school being tested relative to the Lodge Farm development area. If this school intake was reduced, and therefore fewer external trips were generated then the predicted impacts at Dunchurch would reduce. "

- 2.170. Based on these findings, concern about the impact of development of Lodge Farm on Dunchurch Crossroads and the A426 remain. These concerns would arise if the school were reduced to 5FE (a 6FE school was tested in the STA). 4FE schools, although possible, often struggle to be financially sustainable and so would not be the optimal solution.
- 2.171. An education note provided by the site promoter confirms that a secondary school at Lodge Farm would not open until that development were very advanced and in the interim pupils from the development would need to go to existing schools. A secondary school would not open within the plan period to 2042. This raises concerns about additional journeys into Rugby to access existing schools in the interim.
- 2.172. There remain more general concerns about the sustainability of a secondary school at Lodge Farm given a school would likely need to be five forms of entry to be financially sustainable and the scale of the development would not justify a new school of this size alone and the hinterland of the development is rural and sparsely populated.
- 2.173. Further concerns about the proposal are highlighted in the viability assessment. The site promoter's material shows a development which is bisected by the A45. The A45 forms part of the Major Road Network (MRN). The MRN comprises the country's busiest and most economically important local authority managed 'A' roads. This is the tier below the Strategic Road Network (SRN) which is managed by National Highways.
- 2.174. The position of the Council is that it would be undesirable for a new settlement at Lodge Farm to be bisected by the A45. This would create significant severance for residents of the new development and/or would also undermine the economic role of the A45 as a route for through-traffic by requiring 20mph speed limits, traffic calming and frequent junctions/crossings. Slightly further along the A45, the Daventry Bypass was completed in 2018 to remove A45 traffic from going through Daventry. The Council's view is that a new settlement at Lodge Farm should similarly be bypassed by the A45, as Daventry is, rather than have a MRN route running through its centre. A bypass would also enable disruption to the A45 to be reduced during the lengthy construction phase of Lodge Farm.
- 2.175. Preliminary estimates undertaken by Warwickshire County Council indicate that an A45 bypass could cost £30m. When this is added to the £35m cost of a secondary school, £28m for two primary schools and an estimated £17m for sustainable transport (comprising a new cycle link to Dunchurch and the bus package), and a budget of £61m for significant upgrades to the A45/M45 Thurlaston Interchange (likely comprising grade separation) the scale of strategic infrastructure needed is very high. The whole plan viability study indicates that Lodge Farm could not viably deliver the infrastructure package needed to make it sustainable even at 0% affordable housing. The viability position is more challenging than it was for Houlton and South West Rugby which are discussed above and are delivering sub policy compliant levels of affordable housing. For the

reasons explained in more detail above, concerns about affordable housing delivery are important and are a reason that tells against Lodge Farm being a reasonable option.

2.176. Finally, Inspector Hayden in 2019 expressed concern about the landscape impact of development Lodge Farm. The landscape sensitivity is assessed as 'medium' in the local plan Landscape Sensitivity Assessment and significant green infrastructure and landscape mitigation is proposed. Nonetheless, the scale of the area being developed is very large and therefore landscape impact remains a concern.

2.177. Overall, there are significant concerns about the deliverability of Lodge Farm as the principal non-Green Belt alternative that could reduce the need for Green Belt housing. These concerns strengthen the exceptional circumstances case for Green Belt release.

### **3. PARAGRAPH 148: PREVIOUSLY DEVELOPED LAND, OTHER GREY BELT, THEN OTHER GREEN BELT**

- 3.1. As noted above, paragraph 148 states that when Green Belt land is released, priority should be given to previously developed land first, then grey belt then other Green Belt locations. This is caveated by the need to promote sustainable patterns of development in line with NPPF paras 110 and 115.
- 3.2. In the case of Gypsy and Traveller sites, no alternatives have been identified to the sites proposed to be released from the Green Belt and therefore paragraph 148 is not engaged. This is similarly the case for the proposal to release existing industrial land from the Green Belt.
- 3.3. In relation to employment land, no sustainably located sites that are previously developed land and would be reasonable options for meeting the same need have been identified.
- 3.4. Employment sites need to have good access to the strategic road network. There are no sustainably located previously developed land that could deliver the quantum of growth required.
- 3.5. With the exception of site 14, Ansty Park north, the sites proposed to be released from the Green Belt for employment land are not grey belt as shown in the Stage 1 Green Belt Contribution Study.
- 3.6. No grey belt sites were identified as reasonable options for employment land in the stage 2 site assessment study. Two large sites to the south east of M69 Junction 1 which are partly grey belt were considered in the Stage 2 site assessment. These sites are site 141 Land off Hinckley Road, Shilton and site 94 Land adjacent to Hinckley Park, south of A5. Neither of the sites were progressed as reasonable site options. A further grey belt site, site 109, land at Hespford Farm, Ansty was assessed in the stage 2 site assessment but was not progressed.
- 3.7. Overall, there are no reasonable grey belt options that could be given priority over the proposed Green Belt employment allocations.
- 3.8. All of the proposed residential allocations in the Green Belt are shown in the Green Belt



Contribution Study as grey belt except for site 316 and 253 at Long Lawford. Green Belt harm assessments have been undertaken for these sites which find that the sites would further erode Long Lawford's fragile separation from Rugby. It also concludes that the developments would be incongruous with the urban pattern and not restricted and contained.

- 3.9. There are not sustainably located brownfield sites within the Green Belt that could be allocated in preference to the proposed grey belt allocations.
- 3.10. The rationale for allocating the Green Belt sites at Long Lawford, despite the harm noted above, ahead of further grey belt sites at other villages is as follows:
  - 3.10.1. Long Lawford is the fifth highest scoring settlement in the Rural Sustainability Study. It is the highest scoring settlement for public transport and lies very close to higher-tier services in Rugby. For children from the proposed developments, walking and cycling to secondary school would be a realistic option and this is not true of grey belt locations in other villages. Education modelling highlights that there is significant capacity at Long Lawford Primary School which could accommodate the new pupils from the proposed new housing. There are no grey belt options at Long Lawford and overall there is a clear case for allocating land for new housing at the village.
  - 3.10.2. Overall, the selection of Green Belt sites for allocation is consistent with paragraph 148 and priority has been given to grey belt sites except where clearly justified.
  - 3.10.3. The development site allocations for these sites limit the area to be removed from the Green Belt to that necessary to deliver the required residential development. The site allocation policies also require creation of strong southern landscape boundary to create a new long-term defensible Green Belt boundary. The site allocations would also maintain a Green Belt wedge between Rugby and Long Lawford, maintaining the separate identity of the settlements.

## 4. CONCLUSION

- 4.1. This topic paper has summarised the exceptional circumstances justification for the removal of land from the Green Belt in the Rugby Borough Local Plan.
- 4.2. The paper demonstrates compliance with paragraphs 145 to 148 of the NPPF in fully evidencing and justifying exceptional circumstances to alter Green Belt boundaries.