



# **RUGBY BOROUGH COUNCIL CONSULTATION STATEMENT EXECUTIVE SUMMARY**

**JANUARY 2026**

# 1. OVERVIEW OF THE ISSUES AND OPTIONS CONSULTATION

## 1.1 CONSULTATION PROCESS

The Issues and Option Consultation was the first consultation stage undertaken as part of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It ran from 30<sup>th</sup> October 2023 to 2<sup>nd</sup> February 2024 and was open to any interested organisation or individual, with formal notices sent to:

- Statutory consultees
- Duty to Cooperate partners
- Parish councils
- Local councillors

The consultation included nine 'drop-in' events at key locations around Rugby in addition to two online events. Participants were able to share their views via formal letter/email or use the online questionnaire.

The consultation sought to gather feedback on priorities for plan-making and to inform land use strategy and policy development. Questions covered employment land use, housing land use, town centre regeneration, Gypsy and Traveller accommodation, houses in multiple occupation, climate change, design, and asked respondents what other issues they wished to be considered.

Please see Appendix 1 of the Consultation Statement for full details of the Issues and Option Consultation process.

## 1.2 CONSULTATION RESPONSE

The consultation received 274 formal written responses via email or using the online questionnaire, with 9 people submitting multiple responses. The breakdown of response types was as follows:

- 172 responses from private individuals
- 60 responses from landowners or developers promoting sites
- 12 responses from parish councils
- 9 responses from statutory consultees
- 6 responses from neighbouring local authorities
- 15 responses from other organisations

Please see Appendix 1 of the Consultation Statement for full details of the Issues and Option Consultation responses, with a summary of comments received for each question.

# 2. OVERVIEW OF THE PREFERRED OPTION CONSULTATION

## 2.1 CONSULTATION PROCESS

The Preferred Option consultation was the second stage of consultation undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It followed on

from the Issues and Options Consultation in 2024.

The Preferred Option consultation ran from 24<sup>th</sup> March 2025 to 19<sup>th</sup> May 2025 and was open to any interested organisation or individual. Formal consultation notifications were issued to:

- Statutory consultees
- Duty to Cooperate partners
- Parish councils
- Local councillors

Feedback was received from across the community via online surveys, letters and emails. The Council also held seven open events around the Borough to answer questions and provide information on the Preferred Option consultation.

Please see pp10-14 of the Consultation Statement for full details of consultation events and methods.

## 2.2 CONSULTATION RESPONSE

The Council received representations from 4227 individuals and organisations during the consultation period.

An additional 2069 hard-copy letters were received in relation to the omission site Lodge Farm, so in practice the number of respondents is greater this. However, we are aware that within the 2069 letters some respondents have made duplicate submissions, and we have been unable to verify (within the available time) the exact number of unique respondents from this total.

The table below summarises the responses received from different consultees. The remaining responses were made by individuals.

Respondent type	Representation made online	Representation made by email/post	Duplicates (submitted both online and by email/post)*	Total
Statutory consultees and infrastructure providers	1	16	-	17
Neighbouring Authorities	1	5	-1	5
Parish Councils and residents' groups	-	28	-	28
Councillors and MPs	2	9	-	11
Site promoter	16	72	-9	79
Other organisations	2	17	-	19
<b>Totals</b>	<b>22</b>	<b>147</b>	<b>-10</b>	<b>159</b>

\*where a respondent submitted more than one email, these are grouped and counted as one respondent rather than being considered duplicates

## 3. SUMMARY OF RECURRING THEMES

This summary aims to highlight some of the most frequently raised comments received in the consultation. It gives an overview of actions taken in response to the consultation to show how feedback has been reflected in the Regulation 19 Proposed Submission Local Plan.

### 3.1 USE OF GREENFIELD AND BROWNFIELD LAND

274 responses were received relating to the use of greenfield land for allocations with respondents suggesting

that more sustainable brownfield sites were available. Many felt that housing should be focused on Rugby town, rather than at villages or in rural areas. Comments relating to this point include local organisational responses from Clifton-upon-Dunsmore Parish Council, Monks Kirby Parish Council, Religious Society of Friends, Wolvey Parish Council and Wolvey Village Hall Foundation.

### RBC response and consultation outcome

The Council has undertaken an Urban Capacity Study to identify additional brownfield sites suitable for development. This has resulted in an additional 588 units allocated within the town on brownfield sites. 29% of policy S6 allocations in the Proposed Submission Plan are brownfield sites, up from 6% in the Preferred Option Consultation Plan.

Policy S6 continues to allocate housing in rural greenfield sites but these are focused on settlements identified as the most sustainable within the Rural Sustainability Study. The largest rural allocations are at Long Lawford due to its stronger public transport and active travel potential and primary school capacity. The overall level of housing proposed in the rural areas is proportionate to the scale of the rural population within the borough and there is a strong justification for housing to support rural sustainability.

43% of policy S6 allocations and 88% of total identified supply (including ongoing sites allocated in the adopted plan such as Houlton and South West Rugby) are on greenfield and brownfield sites around the town of Rugby in the Proposed Submission Plan.

## 3.2 RELEASE OF GREEN BELT LAND

59 comments were received relating to the release of Green Belt land for development, questioning whether this is justified. Additionally, each individual Green Belt allocation received multiple site-specific comments in this regard. Organisational responses on this topic include: Sworders on behalf of landowners, GLP, Wolvey Wetland Trust, Stoford, St Modwen, Mackenzie Miller Homes, Bilton Grange School, Wolvey Parish Council, Monks Kirby Parish Council, Pailton Parish Council, and Newton and Biggin Parish Council.

### RBC response and consultation outcome

The reasoning behind release of Green Belt land is set out in the Exceptional Circumstances Topic Paper. A Green Belt Study has been published which shows Green Belt allocations are predominantly made on land identified as grey belt, in line with the latest national policy.

The council considers that there are exceptional circumstances justifying Green Belt release. The Green Belt release has focused on the most sustainable locations.

## 3.3 IMPACTS ON INFRASTRUCTURE

One of the most frequent comments raised by the community was the impact on infrastructure. These comments were usually in relation to specific sites or settlements and so a total figure is not available. Concerns primarily related to roads and traffic congestion. Many settlement-specific comments expressed concern around local school capacity and healthcare facilities, and several mentioned the lack of A&E in Rugby.

### RBC response and consultation outcome

The Local Plan's focus is land use rather than infrastructure. Accordingly, it must only ensure that impacts attributable to new developments are mitigated. Developers cannot be compelled to remedy to pre-existing shortages or pressures. The evidence base includes the findings of various studies designed to ensure there is suitable mitigation in place for new development through the plan.

The Strategic Transport Assessment has been completed and published as part of the Proposed Submission Plan's evidence base. This has identified several mitigation schemes which are outlined in the Infrastructure Delivery Schedule. Contributions will be required from relevant developments to deliver these schemes. It

also resulted in the removal of strategic employment site 328 at Ryton-on-Dunsmore and replacement with an alternative site at Walsgrave Hill to avoid the forecasted impacts on Tollbar End roundabout.

Education modelling has identified future capacity at schools and allocations have been made in line with these figures. The proposed school at St Thomas Cross which received 124 comments of objection from the community was found to be unnecessary, and this allocation has been removed. The scale of need for secondary school places can be accommodated through school expansion.

Further evidence has also been published relating to water infrastructure in the Stage 2 Water Cycle study.

Rugby Borough Council has engaged with the Coventry and Warwickshire Integrated Care Board (ICB) and other NHS organisations through regular meetings of the Rugby NHS Local Estates Forum to establish the need for future health case floorspace. Those organisations, collectively, are responsible for planning the NHS estate in the borough. The scale of additional housing growth planned through the proposed submission local plan is modest compared to the 2019 Local Plan. Accordingly, the ICB advise that there is not the business case to create new surgeries through new development. Instead, their strategy will be to expand existing surgeries if required and seek contributions from developers towards this.

### **3.4 DISPERSAL STRATEGY INSTEAD OF LARGE STANDALONE SITE**

50 email/letter comments were received in objection to what was characterised by some as a “dispersal strategy” to meet residual housing needs adopted by the Preferred Options Consultation Document, with preference expressed for a large standalone site. Additionally, 144 responses to the online questionnaire were opposed to the spatial strategy proposed, out of 267 respondents to the question. Organisational responses were received from Warwickshire County Council, Wolvey Parish Council and Brinklow Parish council in this regard.

#### **RBC response and consultation outcome**

Most of the housing delivery during the plan period will take place at large-scale sites already allocated in the adopted Local Plan, namely Houlton and South West Rugby. Just under half (43%) of the new allocations made under S6 in the Proposed Submission Plan are at Rugby, with the remainder at the Main Rural Settlements.

Two principal large sites were identified in the interim Sustainability Appraisal published at preferred options stage: Site 73 Lodge Farm and Site 114 Northwest Rugby. Both sites are considered in the Strategic Transport Assessment (STA) and the Viability Study published as part of the Proposed Submission Plan’s evidence base. The STA highlights the highways impacts of Lodge Farm, particularly at Dunchurch Crossroads. The viability study finds that Lodge Farm would be unviable even if it does not deliver any affordable housing. Site 114 Northwest Rugby would only be able to deliver 20% affordable housing, less than a policy compliant 40%. This is due to the scale of infrastructure required to deliver the sites.

The spatial strategy for residential development of the Preferred Option Plan is therefore retained, and neither large site is allocated. However, the spatial strategy is amended to include a greater focus on the Rugby urban area.

### **3.5 HARM TO THE RAINSBROOK VALLEY**

172 comments were received in relation to the impacts of housing allocations in Hillmorton near the Rainsbrook Valley. These included comments from organisations or resident groups such as Crick Road Residents and Kilsby Action Group. Respondents noted that previous applications in the area had been refused and an appeal decision had highlighted landscape impact. Others argued that development would harm the ecological and recreational value of the valley.

### RBC response and consultation outcome

Site 40 and site 334 in Hillmorton have been removed from the Proposed Submission Plan. Additionally, policy EN3 identifies the area as a landscape of elevated sensitivity and seeks to protect it from future development that would harm the landscape. This is based on a new Landscape Sensitivity Study which provides up-to-date evidence and is published as part of the Proposed Submission Plan's evidence base.

## 3.6 COVENTRY STADIUM, BRANDON

1552 responses were received regarding policy W1(b) which supports the redevelopment of Coventry Stadium, Brandon for speedway and stock car racing alongside other community uses and prevents development which conflicts with these uses. 22 individual responses were received in objection to this policy, citing concerns such as noise, pollution and unviability, while 1530 respondents supported the policy.

### RBC response and consultation outcome

The policy is retained in the Proposed Submission Plan.

## 4. SETTLEMENT-SPECIFIC RESPONSES

A high-level summary of the main themes is provided for each settlement alongside any changes in the Proposed Submission Plan.

### 4.1 ANSTY (EMPLOYMENT SITES 14 AND 95)

4 individual responses

Comments received about Ansty related to traffic implications, disproportionate scale of development in the area and impacts on the village. There was concern for possible future implications once site 95 is released from the Green Belt.

#### Outcome

Employment sites 14 and 95 are retained in the Proposed Submission Plan. Site 95 has been granted planning permission.

### 4.2 BARNACLE (GYPSY AND TRAVELLER SITES AT TOP PARK AND WILSHER RANCH)

124 individual responses

All settlement-specific comments relating to Barnacle were regarding Gypsy and Traveller allocations at Top Park and Wilsher Ranch. The biggest concern was the use of Green Belt land, contrary to previous inspector decisions. Many also raised the large concentration of Traveller sites in proximity to a very small village, arguing this has created an imbalance in the size of the settled and travelling communities. Lack of plumbing, footpaths and lighting around Top Park were also noted as causing safety issues.

#### Outcome

The concerns raised by residents are acknowledged, however Top Park and Wilsher Ranch are retained as Gypsy and Traveller site allocations in the Proposed Submission Plan. In view of the scale of need for pitches there is a need to allocate suitable sites. Green Belt impact is assessed in the stage 2 Green Belt assessment.

## 4.3 BRINKLOW (SITES 337 AND 315)

224 individual responses

The most common response was that the scale of development is disproportionate to the size of the village and will fundamentally alter its character and historic identity. Concerns that infrastructure may be overwhelmed accounted for most other comments, most notably impact on the roads, followed by access to public services, specifically the lack of post-reception school provision locally and overcapacity at the GP surgery. Significant concerns were expressed around the historic setting and adverse impacts on the heritage asset known as 'the Tump'. There was objection to the use of Green Belt land. Some felt the smaller site 337 was appropriate and site 315 attracted more objections.

### Outcome

Site 337 has been allocated for specialist older persons' housing or bungalows to reduce impacts on primary school transport and meet local need.

Site 315 has been reduced from 340 units to 250 units. This reduction in numbers will enable development to be more sensitive to heritage assets. The evidence base does not highlight infrastructure concerns in relation to development in the village.

## 4.4 BROWNSOVER (SITE 59)

191 individual responses

The most frequent comment related to traffic concerns, in particular access challenges on Newton Manor Lane, exacerbation of existing issues at St Thomas Cross Junction, and impacts on surrounding roads. Concerns around flood risk were also common. Many reported existing flooding could be exacerbated by an increase in impermeable surfaces. The proposed school site at St Thomas Cross was objected to by many respondents on multiple grounds and using the Coton Park East site for a school was preferred. Loss of green space and harms to the Great Central Way were also a concern, both due to impacts on people's wellbeing and damage to habitats and local wildlife. Many also felt that Rugby does not have the infrastructure and services to support the increase in population, especially relating to water supply and healthcare provision.

### Outcome

The proposed school site at St Thomas Cross junction has been removed. The education topic paper shows that the scale of demand for school places is not sufficient to justify the creation of a new secondary school and can be met by expanding existing schools.

Site 59 remains an allocation. Flood risk has been assessed as part of the Stage 2 Flood Risk assessment which states it can be adequately mitigated. Site 59 can also deliver significant public open space, addressing concerns about loss of green space.

## 4.5 CLIFTON-UPON-DUNSMORE (SITES 129, 202, 307)

70 individual responses

One of the main concerns among residents is impact on traffic with reported congestion and parking issues which have worsened since development commenced at Houlton. Many said the primary school is already at capacity and is unable to expand. Other concerns related to increased flood risk, in particular at site 202, damage to wildlife habitats, and landscape impacts. Site 307 is viewed more favourably by some although many were concerned with traffic implications on North Road.



## Outcome

No change to allocations in the Proposed Submission Plan. The sites put forward are considered to be the best site options at the village, and are outside the Green Belt, meaning they must be prioritised. The scale of growth at the village takes into account anticipated primary school capacity. A new area of separation is proposed to maintain separation between Rugby and Clifton upon Dunsmore and protect the village's distinctive character as a hilltop settlement.

## 4.6 COTON PARK (EMPLOYMENT SITE 64)

140 individual responses

Key concerns were the increase in traffic, especially from HGVs, and the impact this will have on safety and congestion on the roads, particularly near the primary school. Many thought the site would be better suited to residential development. Concerns were raised about the inclusion of Gypsy and Traveller accommodation as part of an employment site. Loss of wildlife habitats and green space was another concern. There was support from one respondent for this site over green belt employment development.

## Outcome

The Gypsy and Traveller accommodation has been removed. The site remains an employment allocation, in line with the site promoter's submission to the call for sites. It is a non-Green Belt site with good access to the strategic road network and is therefore required to be prioritised. The site has not come forward for residential development despite its past allocation and is not currently being made available for residential development. In these circumstances it would be difficult to demonstrate that the site is available for residential development. Additional development principles have been added to the policy particularly to address the relationship between the development and neighbouring residential properties and the school.

## 4.7 DUNCHURCH (SITES 90 AND 341)

231 individual responses plus 652 hard-copy letters sent by Action for Dunchurch

The greatest concern was the impact of increased traffic on the village, in particular increased air pollution, worsened safety at the A426/A45 junction, noise and impacts on cyclists, walkers and children. Many commented that the village is already absorbing impacts of SW Rugby and cannot accommodate further allocations, with coalescence with Rugby already taking place. Other prevalent comments were increased pressures on the school and GP surgery and damage to landscape and loss of habitats.

## Outcome

Sites 90 and 341 have been removed from the Proposed Submission Plan. This is due to the scale of development already allocated in the area through South West Rugby, and strategic transport assessment findings highlighting that this is a part of the network already experiencing significant pressures. An area of separation is included in the Proposed Submission Local Plan to protect the distinct identities of Dunchurch and Thurlaston and avoid coalescence with the Rugby urban area.

## 4.8 SAFEGUARDED LAND (EMPLOYMENT SITE 17)

129 individual responses

The most recurring comment on this site was a preference for residential development to reduce the need for housing elsewhere in the Borough. There were also concerns raised around the impacts on residents and wildlife from continuous operations of warehouses and the associated noise and light pollution, as well as the relationship with Cawston Spinney. Many expressed concerns around increased traffic and congestion, with ambiguity around the funding of the Potsford Dam Link Road also mentioned.



## Outcome

The site's capacity has been significantly reduced from 130,000 to 60,000 sqm in the Proposed Submission Plan in order to reduce the impacts on Cawston Spinney. As with the site at Coton Park East, the site is not being made available for residential development and is retained as an employment development allocation. The site is well located for employment development in terms of its access to the strategic road network. The rationale for this decision is explained in more detail in the Green Belt Exceptional Circumstances Topic Paper.

## 4.9 HILLMORTON (SITES 40 AND 344)

222 individual responses

Impact on traffic congestion from an increase in population was the greatest concern. The second most frequent comment was damage to the Rainsbrook Valley landscape, including loss of views and damage to habitats. Many cited previous landscape assessments and appeal decisions. Impacts on local services was also a common response with many referencing over-capacity schools causing children to be allocated places at schools elsewhere in Rugby, and the lack of local medical facilities. Effects were felt to be compounded by the development of Houlton. A smaller number of respondents actively supported the development as it would enable more people to access housing in the area.

## Outcome

Sites 40 and 334 have been removed from the Proposed Submission Plan. This is due to the elevated landscape sensitivity of the Rainsbrook Valley which is identified as a landscape of elevated sensitivity, as outlined above.

## 4.10 NEWBOLD-ON-AVON (SITE 75)

42 individual respondents

The most frequently raised concern is the loss of green space and impacts on community wellbeing and spaces for children to play. In particular, the site is frequently used by the local Scout Group for outdoor activities. Many also raised the loss of the bus turn which is well used by residents. An alternative site on Parkfield Road was proposed as more suitable. Other comments included the unjustified use of Green Belt land, flood risk and impacts on wildlife.

## Outcome

Site 75 is removed from the Proposed Submission Plan due to its recreational value as open space.

## 4.11 NEWTON (SITE 87)

27 individual responses (Note that comments on Site 59 are included under 'Brownsover' above due to the relationship of the site to that area, even though it lies within Newton & Biggin Parish).

Comments on site 87, were broadly supportive subject to design and layout considerations, including the restriction to a 1ha area of development. There was support for the retention of the public right of way and new pedestrian crossing provision. Some respondents felt the overall scale of allocation around the village, including sites 59 and 64, were inappropriate given its status as 'Other Rural Settlement' within the settlement hierarchy.

## Outcome

The site is retained in the Proposed Submission Plan and the 1ha area restriction, pedestrian crossing and PRow provision remain in the development principles.

## 4.12 RYTON-ON-DUNSMORE (SITE 100 AND EMPLOYMENT SITE 328)

81 individual comments

Almost all concerns at Ryton related to the employment site 328. Fewer than 5 comments were received relating to residential site 100 which primarily concerned traffic impacts and overdevelopment. Regarding site 328, the greatest concerns were the increase in traffic and HGVs and the loss of valued Green Belt land and associated habitats and recreational uses. Issues such as noise, light pollution and vibrations from HGVs and operations at the site were frequently raised and it was felt by many that the development would alter the semi-rural setting of the village. Many respondents were also concerned by the inclusion of a Gypsy and Traveller pitch on site due to there reportedly being ongoing social cohesion issues with the existing RBC-run pitches near the village. Many respondents were unhappy that the village did not have a consultation event and felt there had been insufficient notice to residents of the proposals.

### Outcome

Employment site 328 is removed from the Proposed Submission Plan due to its significant traffic impacts on Tollbar End Roundabout for which no mitigation has been identified.

Residential site 100 is retained in the Proposed Submission Plan and is also identified in the Neighbourhood Plan.

## 4.13 STRETTON-ON-DUNSMORE (SITES 6, 81, 134)

48 individual responses

The primary concern was impacts on road infrastructure with responses highlighting narrow lanes and parked cars. Access issues were raised for sites 6 and 134 in particular. Increased pressure on services such as the primary school and GP surgery, as well as capacity at the Village Hall were also concerns. Many residents reported flood risk issues. Use of Green Belt land was not felt to be fully justified by several respondents. Other concerns were the change to the character and feel of the village from new housing, increased car dependency due to poor transport links and lack of local employment, and the fact that there are already existing development proposals with unknown impacts. Four respondents felt site 120 (site 348 in new format) would be better positioned for access.

### Outcome

Sites 81 and 6 are retained in the Proposed Submission Plan. The village is a sustainable rural location with access to amenities including GP surgery and primary school.

Site 134 is removed from the Proposed Submission Plan due to its poorer access than site 348.

Site 348 'The Croft' (a new format of site 120) has been added to the Proposed Submission Plan for 70 units, due to its preferable access. This reduces the total allocation at Stretton-on-Dunsmore by 50 units.

## 4.14 WOLSTON (SITE 39 AND OMISSION SITE 302)

3 individual responses

Few comments were received regarding Wolston. There was a request to safeguard part of the site for extension to Wolston Cemetery. Two respondents referred to an omission site, citing concerns around impacts on neighbouring properties and the local primary school.

## Outcome

Site 39 is retained in the Proposed Submission Plan but with a new boundary to accommodate future expansion of the Wolston Cemetery.

Site 302 remains an omission site and is not allocated in the Proposed Submission Plan.

Site 136 'North of Warwick Road' has been added to the Proposed Submission Plan providing 80 units of specialist housing for older persons or bungalows to meet local need. Further development at Wolston has been restricted based on Warwickshire County Council advice to reduce the need for additional home to school transport.

## 4.15 WOLVEY (SITES 84, 96 AND 309)

308 individual responses

The biggest concerns in Wolvey were the loss of Green Belt land and the scale of development which was considered disproportionate to the village and would overburden services and alter its identity and character. Another frequent concern was the increase in car journeys and resultant traffic impacts. Loss of biodiversity and wildlife habitats, as well as increased flood risk were also common concerns, especially relating to site 84.

## Outcome

Site 84 is removed from the Proposed Submission Plan due to its higher flood risk and poorer relationship to the village.

Site 96 is retained in a significantly smaller format as Site 358 in the Proposed Submission Plan, with an allocation for 60 units, reduced from 500 units. This scale of development is proportionate to the village.

Site 309 is retained in the Proposed Submission Plan. This scale of development is proportionate to the village.

## 4.16 LODGE FARM (OMISSION SITE 73)

248 individual responses plus 2069 letters from Stand Against Lodge Farm, and 469 letters from Action 4 Dunchurch

The most frequent comments relating to Lodge Farm were its isolated location and associated impacts on traffic and congestion. Lack of guaranteed infrastructure on-site which could increase strains on surrounding services was another common concern. The impacts on the Leam Valley landscape and ecosystems, and harms to the historic environment were also raised by many. Comments relating to the impact on the Dunchurch Pools Marina were also noted. Many wrote that the grounds for rejection during the previous plan examination have not changed.

## Outcome

Site 73 remains an omission site and is not allocated in the Proposed Submission Local Plan. This is due to highways impacts, particularly at Dunchurch Crossroads, highlighted in the Strategic Transport Assessment, and the findings of the viability study which concludes that Lodge Farm would be unviable even if it does not deliver any affordable housing.