



16th May 2025

Monks Kirby Parish Council – Representations to RBC Local Plan Preferred options Consultation

Monks Kirby Parish Council supports the Local Plan review process in providing a development strategy for the borough. It is important that housing and employment needs are planned for to provide certainty to local communities as to what development and land use should go where. However, we are concerned about the current development strategy for a dispersed approach to the allocation of housing sites, in particular the number and extent of Green Belt and green field development sites forming part of the new residential allocation numbers, and object to the Borough Council's strategy on this basis.

We have no objections to the various development management policies set out under section headings related to Climate, Environment, Wellbeing and Design and the Borough Council's approach to securing Climate and Environmental benefits from new development is to be commended. However, if not already done so, we would recommend assessing what potential impact the various policy targets would have on the viability of housing development to ensure that much needed affordable housing can still be delivered in line with the Council's proposed Policy H4.

We note the Borough Council's strategy for employment land at Policy S3 and the allocation of new floorspace in use classes B2, E(g) (ii) and (iii) and B8 totalling 1,231,987 sqm. It is vitally important for surrounding communities that the associated traffic impacts of this development are fully assessed and to ensure that any increase in traffic movements can be accommodated on, and directed to, the main highway network with no detrimental impact on surrounding communities. We note that a Strategic Transport Assessment is to be prepared as part of the next stage of local plan review and this will need to inform the suitability of the employment allocations going forward.

On the development strategy for housing, we object to the balance of residential allocations under Policy S6, which is skewed towards green field development, including the release of Green Belt sites. By our calculations, over 51% of the new residential development allocation housing numbers will be on existing Green Belt land, whereas as over 93% of the housing numbers will be on green field sites.

The National Planning Policy Framework (NPPF) sets out the relevant planning policy framework for the preparation of the plan. Section 11 refers to making effective use of land, paragraph 124 of which indicates that planning policies should promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. It is noted that strategic policies should set out a clear strategy for accommodating assessed needs in a way that makes as much use as possible of previously developed or 'brownfield' land. Paragraph 125 describes how policies and decisions should, inter alia, give substantial weight to the value of using suitable brownfield land within settlements; and promote and support the development of under-utilised land and buildings.

Section 13 of the NPPF refers to protecting Green Belt land. Paragraph 145 confirms that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Paragraph 146 indicates exceptional circumstances include instances where an authority cannot meet its identified need for homes and other development, in which case authorities should review Green Belt boundaries in accordance with the Framework policies and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes of the Green Belt. We note that at this stage, the Borough Council has yet to undertake its Green Belt Contribution Study to provide evidence in this regard.

Paragraph 147 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. The paragraph goes on to indicate that this will be assessed through the examination of its strategic policies and will take into account the preceding paragraph and whether the strategy makes the best possible use of suitable brownfield sites and underutilised land, optimises the density of development; and has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.

Of the new site allocations identified under Policy S6, only 2 no. sites are allocated on brownfield land within the Rugby urban area – Morgan Sindall House (90 dwellings) and Albert Street (25 dwellings). Otherwise, it appears that the only other two brownfield sites are located on sites with farm buildings located outside the urban area – Hillcrest Fram, Newton (25 dwellings) and West Fram and Home Farm within the Green Belt and Brinklow (75 dwellings).

We are not convinced that the Borough Council has demonstrated that it has examined fully all other reasonable options for meeting the identified need for housing. We note that the south-eastern half of the Borough, including the main urban area of Rugby as well as settlement areas to the south, east and north of the town (Dunchurch, Hillmorton, Brownsover and Clifton upon Dunsmore) are not constrained by Green Belt designation and could provide opportunities for more sustainable development closer to the main urban area of Rugby.

Notwithstanding, we note that paragraph 22 of the NPPF indicates that strategic policies should look ahead over a minimum 15-year period from adoption. The Council's Local Development Scheme indicates that the Local Plan is due to be adopted by June 2027. Working back a minimum of 15 years from that date would result in a plan period running to 2042, rather than 2045. It is therefore within the Borough Council's gift to reduce the overview plan period and associated housing numbers identified at Policy H2 (Strategy for homes), which would allow for sites not located in the Green Belt to come forward in due course to meet future housing needs.

In addition to the above, we have concerns regarding the allocation of housing numbers in the Main Rural Villages having regard to the sustainability scores set out in the Council's Rural Sustainability Study, dated December 2024. The Main Rural Settlements are highlighted blue in the Settlement Rankings table at page 11, with sustainability scores for access to services, public transport and internet, followed by an over score. We note the overall scores below with corresponding allocation of housing numbers under Policy S6:

Dunchurch – score 49 – 210 dwellings

Binley Woods – score 47 - 0 dwellings

Wolston – score 45 – 15 dwellings

Brinklow – score 44 – 415 dwellings

Long Lawford – score 38 - 400 dwellings

Stretton-on-Dunsmore – score 38 - 168 dwellings

Clifton on Dunsmore – score 36 – 150 dwellings

Ryton-on-Dunsmore – score 36 - 35 dwellings

Wolvey – score 35 – 710 dwellings

Based on the above, the five settlements with an over sustainability score of less than 40 account for some 70% of the housing allocation numbers with the top four settlements with scores of over 40 accounting for the balance of 30%. Wolvey in particular stands out as having the lowest sustainability score yet accounts for some 34% of the total housing allocation numbers to the Main Rural Settlements on its own. Meanwhile, Binley Woods with the second highest sustainability score has no housing allocation, whilst Wolston with the third highest has an allocation of just 15 dwellings. We are not seeking to define the allocations for the Rural Settlements but highlight the apparent imbalance of allocated numbers having regard to Council's sustainability scoring.

The first objective of the draft Local Plan as noted at page 6 is to support diversification and growth in sustainable locations. We would urge the Borough Council to review its development strategy and consider what in our view would be a more sustainable pattern of development by focussing new housing allocations on brownfield sites within and on the edge of the urban area in the first instance before then looking to the more sustainable main rural settlements, in particular those not constrained by Green Belt.

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