

Action4Dunchurch (A4D)

OBJECTION TO RUGBY BOROUGH LOCAL PLAN – PREFERRED OPTIONS (REG. 18)

Prepared [REDACTED]

On Behalf of Action4Dunchurch

1 EXECUTIVE SUMMARY

1.1 The Preferred Options would concentrate $\approx 4\,200$ dwellings and $213\,000\text{ m}^2$ of new employment floorspace within Dunchurch parish when the committed South-West Rugby Sustainable Urban Extension ("SWR SUE") is added to the fresh allocations set out in March 2025. In proportional terms this equates to tripling the size of a Main Rural Settlement of c.3 000 residents.

1.2 Such growth is unsound because it:

- Conflicts with the settlement-hierarchy strategy (Policies S1 & S2), which commits only 'proportionate' growth to Main Rural Settlements. The proposed expansion would increase Dunchurch's size by over 140 %, converting it from a distinct village into a functional suburb of Rugby. This scale of development fundamentally breaches the proportionality principle embedded in the spatial strategy.
- Exacerbates severe highway and air-quality impacts at the A426/A45 junction. The junction operates well above design capacity and lies within an Air-Quality Management Area, recording NO_2 at $34\text{ }\mu\text{g}/\text{m}^3$ in 2024. National Highways has already flagged 'High' concern for cumulative traffic impacts. Adding new allocations before mitigation is delivered undermines NPPF §§108–116 and breaches Policy EN8.
- Outstrips infrastructure capacity, with no confirmed funding, timeline, or deliverability pathway for key interventions. These include a two-form-entry primary school, GP surgery expansion, and the completion of the Homestead Link and wider spine-road network. WCC forecasts show junior and secondary school deficits of over 100 places by 2025. The spine-road is partially constructed (Link 2 only); Link 3 is unfunded and not timetabled. The plan assumes growth without first enabling the supporting infrastructure, contrary to NPPF §23 and Policy S8.
- Erodes the historic village identity and the strategic green gap between Rugby and Dunchurch. Twelve listed buildings—including two Grade II*—derive their setting, legibility, and heritage value from the surrounding rural landscape and sky-lined approach routes. Allocations at Sites 341 and 90 intrude on these settings, altering panoramic views and severing visual continuity. The cumulative effect is not only harm to individual assets (as flagged in the Node report and LSA) but the transformation of Dunchurch from an autonomous

settlement to a suburban extension. This conflicts with NPPF §212 and Local Plan policies GB1, NE1, and SDC3, as well as the Preferred Option's own Objective 6.

1.3 A4D therefore requests that the Council:

- Delete the following Preferred allocations: Site 341 (Land south of Coventry Road, 180 dwellings), Site 90 (Homestead Farm, 30 dwellings) and Site 17 Phase-2 employment land (130 000 m²), or
- In the alternative, defer their release until (a) the AQMA is revoked, (b) the Homestead Link and spine-road network are fully operational, and (c) a new primary school and GP capacity are in place.

2 LEGAL & POLICY FRAMEWORK

The objections raised are grounded in both national and local planning frameworks, which collectively define the principles of sustainable development, infrastructure delivery, environmental protection, and heritage conservation.

- **NPPF §23** requires that plans be infrastructure-led, and that they avoid promoting growth in advance of the necessary services to support it.
- **NPPF §§108–116** set out detailed expectations for transport, air quality, and traffic impacts. These require that development be sustainable, support modal shift, and not create severe residual network impacts or worsen AQMA designations.
- **NPPF §§164–172** cover flood risk and drainage. Plans must show how sustainable drainage and foul infrastructure will manage development impacts. This has not been demonstrated in the case of Dunchurch.
- **NPPF §§193–200** establish the high bar for biodiversity protection, particularly for sites that intersect SSSI Impact Risk Zones or irreplaceable habitats like ancient woodland.
- **NPPF §212** requires that any harm to the setting of designated heritage assets be given ‘great weight’ and must only be allowed where public benefit demonstrably outweighs that harm. That threshold has not been met in any of the proposed allocations.

At the local level:

- **Policy S1** commits to directing growth to sustainable and infrastructure-ready locations.
- **Policy S2** sets out the spatial hierarchy, limiting Dunchurch to proportionate growth.
- **Policy SDC1** requires new development to be supported by sufficient infrastructure.
- **Policy NE1** and **NE3** protect biodiversity networks and environmental quality, which are clearly threatened here.
- **Policy GB1** preserves the identity of rural settlements and their landscape setting.
- **Policy HS5** addresses the need for timely delivery of education and health services.
- **Policy EN8** reinforces the requirement for proposals to contribute positively to air quality improvement.

In every one of these dimensions—transport, air quality, drainage, biodiversity, infrastructure, heritage, and spatial coherence—the Preferred Options as they affect Dunchurch conflict with these policies. The proposals do not meet the legal or policy threshold required for soundness or deliverability.

3 CUMULATIVE OBJECTION FOR DUNCHURCH

3.1 Traffic, Congestion & Air Quality

- The A426/A45 signal-controlled crossroads operates at > 90 % RFC (2024 WCC model), placing it well beyond its optimal performance threshold even before accounting for future allocations. This junction is one of the most congested in the borough and serves as the primary southern approach into Rugby via Dunchurch. It lies within a designated Air Quality Management Area (AQMA) which has breached the 40 µg/m³ NO₂ annual mean limit every year since 2004.
- National Highways records “HIGH” residual impacts for Lodge Farm (Site 73, now discounted) and “MEDIUM–HIGH” for the Phase-2 employment extension. Both assessments flag strategic network resilience and environmental capacity concerns.
- No funded mitigation exists beyond the partial Link 2 spine-road. Link 3 remains unfunded, with no delivery date, and no scheme exists to improve the A426/A45 node. Under NPPF §116, the residual cumulative impact is ‘severe’ and development should therefore be refused.

3.2 Infrastructure Deficit

Education: Dunchurch Infant and Junior Schools are already operating above net capacity, with forecasts showing a combined deficit of over 100 places by 2025. There is no safeguarded land or funding for new school provision, and the SWR-SUE’s required two-form-entry school remains unbuilt.

Healthcare: Dunchurch Surgery is operating at 136% of its designed patient capacity, with no physical expansion space and no confirmed funding under the current ICS capital plan. Nearby GP practices are also oversubscribed, forcing overflow into Rugby and increasing travel times for routine care.

Transport: The key junction at A426/A45 lies within an AQMA and is already operating above 90% RFC. National Highways reports 'High' residual impacts from even partially modelled growth, and no comprehensive mitigation strategy exists. Spine Road Links 1 and 3 remain unfunded, and safe pedestrian/cycle infrastructure is lacking, with PTAL scores of 0–1a across most sites.

Drainage: The SuDS network planned for SW Rugby is only partially delivered, with the foul water drainage system nearing capacity. Sites 341 and 73 lie in Flood Zones 2/3 and surface water hotspots. Without a complete drainage strategy, any further allocations pose unacceptable environmental and flood risks.

Collectively, these infrastructure deficits make any additional allocations in Dunchurch premature, unsustainable, and incompatible with NPPF Paras. 23, 114–116, and 166–172.

3.3 Unsustainable Transport & Accessibility

Except Bilton Grange parcels (PTAL 1b), every development proposal in and around Dunchurch records a Public Transport Accessibility Level (PTAL) score of 0 to 1a—the lowest tiers in the Borough’s classification system. These scores reflect the absence of regular bus services, rail links, safe walking/cycling corridors, and proximity to basic amenities such as schools, shops, and healthcare. Most sites are more than 800 metres from a frequent bus stop and over 2 kilometres from Rugby town centre, with no segregated cycling infrastructure. The spatial layout forces reliance on the private car for virtually all daily activities, including school runs, GP visits, shopping, and commuting. This entrenched car-dependence directly undermines NPPF §105, which requires that planning decisions actively promote sustainable transport modes. It also contradicts Objective 6 of the Preferred Option, which promises a transition to a greener, lower-emissions transport network. In short, this is not a location where growth can be responsibly or sustainably accommodated under national policy.

3.4 Heritage & Village Identity

Dunchurch is a nationally recognised heritage settlement containing twelve listed buildings—two at Grade II* and ten at Grade II—as well as a designated Conservation Area which encapsulates the medieval village core and its surrounding rural approaches. These include:

- **Grade II*:** Church of St Peter (14th c., tower rebuilt 1790); Bilton Grange School (1846, G. Bainbridge, interiors by A.W.N. Pugin).
- **Grade II:** Dunchurch Lodge; North and South Lodges to Bilton Grange; the village stocks and whipping post; Georgian houses along The Green and Coventry Road; Almshouses; Manor Farmhouse; and several 18th- and 19th-century cottages with original fenestration and fabric.

The **Conservation Area** is valued not just for its architectural groupings, but for its coherent historic layout and open foregrounds, including long views into the village from the Coventry Road and Rugby Road approaches. These views are particularly sensitive because they form the visual context of multiple designated heritage assets.

Site 341 (Coventry Road) lies immediately west of the historic village edge and intrudes into the panoramic approach toward the Conservation Area. It erodes the open setting of Dunchurch Lodge (Grade II), the Bilton Grange RPG, and the skyline relationship with the spire of St Peter’s Church.

Site 90 (Homestead Farm) lies to the south of Site 341 and contributes to the same landscape and heritage setting, forming the field-based visual foreground to St Peter’s Church when viewed from the west. Its development would enclose the historic core and intensify the sense of coalescence with suburban Rugby.

The **2025 Heritage Node report** rates the cumulative harm to designated heritage assets from these allocations as “at the upper end of less-than-substantial.” This triggers NPPF §212, which requires that such harm be given great weight in the planning balance and refused unless outweighed by demonstrable public benefits. No such benefits have been quantified or secured.

Moreover, the failure to provide setting-sensitive design principles, landscape buffers, or Conservation Area protections within the proposed allocations further undermines Policy SDC3 of the Local Plan. The plan fails to protect heritage significance in accordance with national and local policy, and risks permanent and irreversible harm to one of Warwickshire's best-preserved historic villages.

3.5 Landscape & Biodiversity

The 2025 Landscape Sensitivity Assessment (LSA) assigns **High–Medium sensitivity** to Sites 41 and 97 (adjacent to Coventry Road) and to Site 22 (land south of the M45). These areas are characterised by undulating topography, historic hedgerow networks, strong rural skyline views, and open agricultural landscapes. The assessment highlights the role these sites play in maintaining the distinct visual identity of Dunchurch as a freestanding settlement. Development in these locations would intrude upon prominent public views, compromise the integrity of the landscape setting, and contribute to visual coalescence with Rugby.

Additionally, **five proposed sites** fall within the **Draycote Meadows SSSI Impact Risk Zone (IRZ)**—including Sites 17, 20, 25, 58, and 77. These areas are therefore subject to formal Natural England consultation requirements. Within these sites lie sensitive features such as ponds, ancient or semi-natural woodland (e.g. Cawston Spinney), and priority habitats. The IRZ status indicates that even minor interventions could result in adverse effects on the integrity of the protected meadow and its surrounding habitat corridor. The plan fails to include any biodiversity net gain strategy or demonstrate compliance with Local Plan Policy NE1 or NPPF §§193–200. Cumulatively, the biodiversity risk and visual harm render further allocations around Dunchurch unsustainable and contrary to national and local policy.

3.6 Flood Risk & Drainage

Drainage infrastructure in and around Dunchurch is already under pressure from committed growth in the South-West Rugby SUE. The required sustainable urban drainage systems (SuDS) remain only partially implemented, and the foul-water network is operating near or at capacity according to the latest LLFA and Severn Trent assessments. The foul network downstream of Dunchurch flows into the Rains Brook and River Leam catchments, both of which are vulnerable to hydrological overload and water quality deterioration.

Site 341 and the previously-considered **Site 73 (Lodge Farm)** lie partly within **Flood Zones 2 and 3** and coincide with surface water flood hotspot mapping. Development on these sites would compound existing problems, particularly where permeable greenfield land is lost to hard surfaces without effective SuDS in place. The Preferred Option contains no catchment-wide surface water management strategy, no commitment to early SuDS delivery, and no hydraulic modelling of the cumulative effect of development on the local network. This falls short of the requirements under NPPF §§166–172 and contradicts Policy SDC5 of the Local Plan.

3.7 Internal Policy Contradictions

The Preferred Option purports to support Objective 5 (infrastructure-led growth) and Objective 6 (a greener, biodiverse borough). In reality, it allocates further growth to a location where infrastructure is demonstrably lacking and biodiversity is demonstrably at

risk. Air quality, traffic capacity, ecological integrity, drainage infrastructure, and heritage setting are all under stress. The Council's own topic papers and supporting assessments (Sustainability Appraisal, Stage-2 Site Assessment, Heritage Node Report, Landscape Sensitivity) flag major constraints and unresolved risks. Yet these warnings have not shaped the allocation strategy.

As a result, the Plan is **internally inconsistent and unsound**. It fails the NPPF §35 tests of being 'positively prepared', 'justified', and 'consistent with national policy'. Absent meaningful modifications, it is at high risk of rejection at examination.

4 SITE-SPECIFIC OBJECTIONS

4.1 Existing Commitments

4.1.1 South-West Rugby SUE (Policy S8)

The South-West Rugby Sustainable Urban Extension (SWR SUE), allocated under Policy S8, represents a strategic commitment of over 5,000 dwellings and significant employment land to the south-west of Rugby. While intended to deliver infrastructure-led growth, key components of its enabling infrastructure remain undelivered or unfunded, severely undermining the justification for any further allocations in Dunchurch.

The site's spine-road network, meant to carry traffic away from Dunchurch village and mitigate pressure on the AQMA at the A426/A45 junction, is incomplete. While Link 2 is constructed, Link 1 is only partially complete and Link 3—arguably the most critical connection—has neither funding, design approval, nor a delivery timetable. As a result, traffic from both existing and proposed sites is funnelling through constrained village roads and directly into the AQMA. This breach of Policy S8(b)(c) and NPPF §114 undermines the strategy's claim to be infrastructure-led.

Air quality continues to decline. The latest Air Quality Status Report (2024) records roadside NO₂ levels at 34 µg/m³, with projections exceeding 38 µg/m³ as growth from SWR continues. National Highways has flagged the residual impact on strategic and local roads as 'High', and no mitigation scheme is in place or funded. This conflicts with EN8 and NPPF §186 and directly contradicts the Preferred Option's Objective 6 (environmental improvement).

Education infrastructure is under acute strain. Warwickshire County Council forecasts a deficit of 105 junior school places and 92 secondary school places by 2025 across the Dunchurch and Rugby West catchment. While the Local Plan required a new two-form-entry primary school to support the SWR SUE, no land has been safeguarded and no funding is secured. Local schools are already full, with Dunchurch Infant and Junior Schools operating above capacity. This contradicts Local Plan Policies HS5 and SDC1, and NPPF §95, which require that school places are available when needed.

Drainage is another critical bottleneck. The LLFA confirms that sustainable drainage systems (SuDS) are only partially implemented across the SWR SUE, and that foul-water capacity is under pressure. Sites such as 341 and 73 fall into Flood Zones 2 and 3 and are located within mapped surface water flood hotspots. Without a complete drainage network, development poses an elevated risk to downstream systems, contravening Local Plan Policy SDC5 and NPPF §§166–172.

In summary, the SWR SUE remains fundamentally underdelivered on its own infrastructure terms. To introduce additional housing or employment allocations in Dunchurch—before the SUE has fulfilled even its basic obligations—would be irrational, environmentally damaging, and legally unsound.

4.1.2 Symmetry Park Phase 2 (Site 17)

130 000 m² B2/B8 proposed employment floorspace immediately adjacent to **Cawston Spinney**, a designated ancient woodland. The woodland lies within 15 m of the site boundary, far below Natural England's recommended minimum buffer of 50–100 m for large-scale industrial operations. Cawston Spinney hosts a characteristic ancient woodland ground flora—bluebells, wood anemones, and dog's mercury—and is habitat to a range of protected species, including bats, badgers, and nesting owls. It also serves as part of an ecological corridor extending to the Disused Railway LWS. Site 17's development risks nitrogen deposition, edge-effect degradation, noise/light pollution, and fragmentation of the habitat network. No mitigation scheme has been submitted.

In transport terms, this proposal would generate over 1,200 HGV trips per day (TRICS B2/B8 employment benchmark), all funnelling into a **Category 2 congestion zone** and through the Dunchurch AQMA. National Highways rates the residual network impact as '**Medium–High**', with no SRN-capacity enhancement identified in the Council's delivery plan. This directly contravenes Local Plan Policies NE1, SDC1, and EN8, and triggers NPPF §116 (severe residual transport impact), §186 (air quality), and §193–200 (irreplaceable habitat protection).

4.2 Preferred Allocations

4.2.1 Site 341 – Land south of Coventry Road (180 dw)

Site 341 breaches the adopted settlement hierarchy set out in Policies S1 and S2 of the Local Plan. Dunchurch is a Main Rural Settlement, intended for limited and proportionate growth that respects its distinct identity and infrastructure capacity. This proposal, adding 180 dwellings to a village already absorbing more than 4,000 homes through the adjacent SWR SUE, is plainly disproportionate. It conflicts with the spatial strategy and undermines the plan's internal coherence.

The Landscape Sensitivity Assessment (2025) rates the Coventry Road edge as High–Medium sensitivity, citing its role as the transition between the open countryside and the historic core of the village. Development on Site 341 would be visually intrusive, particularly when viewed from National Cycle Route 41 and surrounding PROWs. It would sever the longstanding visual link between the historic settlement and its rural setting, contributing to creeping coalescence with Rugby's southern fringe.

Crucially, Site 341 sits within the foreground of the Grade II* Registered Park and Garden at Bilton Grange. Its southern parcels interfere with skyline views to the spire of St Peter's Church, and its position at the gateway to the Conservation Area further heightens heritage sensitivity. The Heritage Node Report (2025) categorises cumulative harm from this and adjacent sites as "at the upper end of less-than-substantial," triggering NPPF §212 and Policy SDC3.

Accessibility is poor. The site ranks PTAL 0, it lies well outside any active travel corridors and would contribute additional vehicular trips to the already overburdened AQMA junction at A426/A45. National Highways has confirmed that residual impacts from growth in this corridor are 'High' and that no funded mitigation exists.

Environmentally, Site 341 falls within the Draycote Meadows SSSI Impact Risk Zone, requiring statutory Natural England consultation and strict avoidance of harm. No ecological assessment or mitigation plan has been provided. The site also lacks a complete foul and surface-water drainage strategy. Given the acknowledged backlog in SuDS and known capacity limitations in the downstream foul network, this raises further conflict with NPPF P. 166–172 and Policy SDC5.

Overall, Site 341 presents cumulative conflicts across the settlement hierarchy, landscape, heritage, accessibility, air quality, biodiversity, and infrastructure provision. It should be deleted from the Preferred Options.

4.2.2 Site 90 – Homestead Farm (30 dw)

Site 90, located immediately adjacent to Site 341, poses parallel and cumulative harm to Dunchurch’s landscape, infrastructure, and heritage setting. It forms part of the western fieldscape that visually frames St Peter’s Church (Grade II*) when viewed from public rights of way and Coventry Road. Development here would erode the open, undeveloped setting of this nationally important heritage asset and sever its relationship to the surrounding countryside—a defining element of its historic significance.

Like Site 341, Site 90 registers a PTAL of 0, indicating severe inaccessibility by public transport. It is not served by any frequent bus route, lacks safe pedestrian connectivity to village amenities, and lies outside active-travel corridors. All trips would rely on private cars, compounding already unsustainable traffic patterns.

Site 90 also contributes to congestion within the Dunchurch AQMA. It would increase peak-hour flow through a signalised junction already operating above 90 % RFC, with no mitigation scheme in place. National Highways has already flagged the corridor as under ‘High’ strategic pressure.

Moreover, Site 90 shares all infrastructure deficits listed in Section 3.2: it falls within the same catchment as oversubscribed primary and secondary schools, is reliant on the same constrained GP surgery, and would add wastewater load to a foul network already at capacity. No additional mitigation or strategic justification is provided to address these overlapping deficits.

Given these compounding impacts on transport, heritage, drainage, and essential public services, Site 90 should be removed from the Preferred Options.

4.2.3 Phase-2 Employment extension (within Site 17)

The Phase-2 employment extension within Site 17 proposes 130,000 m² of B2/B8 logistics and industrial space, which—based on TRICS benchmarking—would generate approximately 1,200 HGV movements per day, including 24/7 operations. These HGV movements would route directly through or impact the Dunchurch AQMA and surrounding constrained road network. No mitigation has been identified for this traffic volume, and the Council has not demonstrated that the SRN (Strategic Road Network) can absorb this level of additional freight activity. National Highways has flagged residual network impacts as ‘Medium–High’, indicating unresolved capacity issues.

The site boundary lies immediately adjacent to Cawston Spinney, a designated ancient woodland and Local Wildlife Site. There is no proposed buffer of 50–100 m as required by Natural England for development adjoining irreplaceable habitats. Instead, the development abuts the woodland edge, exposing it to nitrogen deposition, light and noise pollution, and physical edge effects. These risks undermine the ecological resilience of Cawston Spinney, which contains ancient woodland ground flora and supports protected species including bats, badgers, and nesting owls.

The development proposal fails to satisfy Local Plan Policies NE1 and EN8, and breaches NPPF §§116 (residual transport impact), 186 (air quality), and 193–200 (irreplaceable habitat protection). The cumulative environmental, ecological, and transport impact of this proposal is unjustified and renders this site allocation unsound.

4.3 Discounted / Not-Progressed Sites

Site 10 – Penthouse, Coventry Road: This site lies entirely within Green Belt, in open countryside with PTAL 0 and no sustainable transport connections. Its inclusion would be incompatible with spatial strategy, contrary to NPPF §140–145. It must remain excluded unless the Green Belt boundary is formally reviewed and exceptional circumstances demonstrated.

Site 20 – Blue Boar Farm: Located in the Green Belt and containing ecologically sensitive features, including ponds and hedgerows. The site is accessed via a constrained highway corridor and ranks poorly for accessibility. It should not be progressed due to landscape, biodiversity, and strategic policy conflict.

Site 41 – Sandford Way: Rated High–Medium sensitivity in the LSA, this site contributes to the rural gateway into Dunchurch from the west. It sits adjacent to the Conservation Area and listed buildings. Further consideration would result in unacceptable landscape and heritage harm.

Site 73 – Lodge Farm: While currently not a preferred option, it appears in Scenarios 3 and 5 in the SA and must be treated as live. It presents extraordinary issues: lies in Flood Zones 2/3, lacks PTAL access, generates ‘High’ traffic risk (per Highways England), and forms the basis for a new settlement unsupported by infrastructure. It must be permanently excluded unless circumstances change significantly.

Site 74 – Lions Field: This small field lies within the visual setting of the Bilton Grange RPG and is adjacent to key heritage assets. Its development would encroach into the open parkland character and degrade rural views. No heritage mitigation is offered, and the site should remain excluded.

Site 77 – Symmetry West: Part of the wider Symmetry Park land but distinct in its constraints. It lies in the Green Belt and adjoins sensitive ecological habitat. Development would breach woodland buffers and contribute to freight movement through constrained networks. Retention of its exclusion is essential.

Site 97 – Drive Field: This site forms part of the eastern gateway into Dunchurch and lies within the viewshed of the Grade II* RPG. Development here would result in cumulative heritage and landscape harm, particularly from light intrusion and massing.

Sites 47, 58, 103, 117, 133: Each of these sites scored poorly in the HELAA for reasons including Green Belt status, ecological constraint, or strategic isolation. No changes have been evidenced that would overcome these barriers.

In all cases, A4D strongly supports their continued exclusion. Unless there is a substantial and clearly evidenced material change in infrastructure, accessibility, and landscape or heritage impacts, these sites must not be progressed further in the Local Plan.

5 CONCLUSIONS & REQUESTED MODIFICATIONS

This consultation is not a final plan but a Preferred Options stage—meant to assess whether growth proposals are appropriate and sustainable. As they affect Dunchurch, they are neither.

Dunchurch is already absorbing one of the largest growth allocations in Warwickshire through the South-West Rugby SUE. It is now being asked to take on even more—despite having no strategic rail access, poor public transport, and constrained primary roads feeding into a designated Air Quality Management Area (AQMA). Schools are full, the GP surgery is operating at 136% capacity, and there is no funded drainage or spine-road infrastructure in place. The cumulative pressure on essential infrastructure is not acknowledged, let alone addressed.

The scale of growth proposed would double or triple the size of a historic village with twelve listed buildings, two at Grade II*, and a nationally important Conservation Area. Key allocations would sever heritage views, erode landscape settings, and permanently undermine Dunchurch’s rural identity—contrary to both the Local Plan’s Objective 6 and national planning policy (NPPF §212).

The proposals are not infrastructure-led, do not align with the spatial strategy, and do not support the stated ambition to focus regeneration in Rugby town. They are therefore inconsistent with the Council’s own policies (S1, S2, EN8, SDC1, HS5, NE1) and the objectives of the NPPF (§§23, 35, 114–116, 186).

Absent meaningful revisions—deletion of Sites 341, 90, and the Phase-2 employment extension; infrastructure phasing triggers; and enforceable air-quality safeguards—this plan will remain unsound and vulnerable to challenge.