

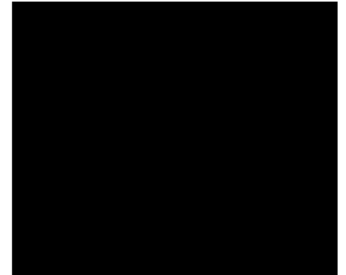
03 March 2025

Our ref: RM/COO3364 223515 03 03 25 001



Email Only:

[REDACTED]



Dear [REDACTED],

**RE: BROWNFIELD REGISTER SUBMISSION RYTON NURSERY, 68 LEAMINGTON ROAD, RYTON-ON-DUNSMORE, COVENTRY CV8 3FN**

This Covering Letter has been prepared by Sworders on behalf of the landowner [REDACTED] (hereafter referred to as the Applicant) in support of a submission of Ryton Nursery, 68 Leamington Road, Ryton-on-Dunsmore, Coventry CV8 3FN to the Rugby Borough Council Brownfield Land Register.

The site in question is as identified by the redline on the Location Plan submitted alongside this Covering Letter.

Rugby Borough Council are legally required to, in accordance with Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017, prepare and maintain a register of previously developed land that is deemed to be suitable, as well as available and achievable, for residential development.

The associated Planning Practice Guidance states that authorities are required to review the Brownfield Register at least once a year, ensuring any appropriate new sites are included, and those which no longer meet the relevant criteria are removed.

The site in question is Ryton Nursery. The site is a commercial garden centre comprising; several permanent structures which contain the indoor retail element of the garden centre selling plants, vegetables and gardening paraphernalia, an outdoor retail area for the sale of garden outbuildings (sheds and summerhouses) and associated hard standing for visitor parking.

The National Planning Policy Framework (NPPF) at Annex 2: Glossary defines previously developed land as the following:



*“Land which is or was occupied by a **permanent structure, including the curtilage of the developed land** (although it should not be assumed that the whole of the curtilage should be developed) **and any associated fixed surface infrastructure**. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.” [emphasis added].*

As detailed above, the site is considered to meet the definition of previously developed land as it comprises several permanent structures and their curtilage in addition to associated fixed surface infrastructure.

All sites must also meet the following criteria:

- A minimum of 0.25 hectares or be capable of accommodating at least 5 dwellings
- Suitable for residential development, having regard to site allocations, existing planning consent alongside any adverse impacts on the natural environment, built environment and residential amenity
- Available by the relevant landowner(s) expressing an intention to sell or develop the site
- Achievable, meaning development is likely to take place within the next 15 years

Taking each of these in turn, the site in question has a site area of 0.26 hectares and could accommodate in excess of 5 dwellings. An indicative net range of dwellings would be between 5 and 7 dwellings depending on the extent of developable area taking into account *inter alia*, access and Biodiversity Net gain.

The site is considered to be both a suitable and sustainable site for residential development. The site is located some 250m from the defined development limits of Ryton-on-Dunsmore which is identified as a Main Rural Settlement in the settlement hierarchy. Ryton-on-Dunsmore provides good access to local services which include Provost Williams Church of England Primary School, College of Policing, Sports Connexion Leisure Club & Venue, The Co-operative Food, Ryton Recreational Grounds, The Blacksmiths Arms PH, Ryton on Dunsmore Village Hall and Summies House all of which can be accessed by active modes of travel using existing pedestrian infrastructure. The site likewise has great access to the employment opportunities on offer at Prologis Park Ryton immediately to the North of the site and benefits from good access to public transport infrastructure which includes a bus stop (Sky Blue Connexion), immediately Northeast of the site along the A445.

It should also be noted that the Rugby Borough Local Plan Preferred Option Draft March 2025 draft allocates a further 350,000sqm of commercial floorspace at Prologis Park West and Mountpark which also includes 55ha of publicly accessible country park along the western site boundary with the River Avon.

The site also benefits from the services and employment opportunities in the wider Coventry urban area.



The site is not subject to any specific site constraints with respect to the natural environment and a residential scheme could be designed to ensure the residential amenity of future occupants is safeguarded.

The site is considered to be both available and achievable. The Applicants are considering bringing forward an application following the adoption of the NPPF and the introduction of 'Grey Belt' which would allow for a more effective use of the land. Development on the scale that the site could accommodate could comfortably come forward within the next 15 years.

Taking all of the above into consideration, the Local Authority are respectfully requested to add this site to the Brownfield Land Register.

A handwritten signature in black ink, appearing to be the initials 'MR' followed by a horizontal line.

[Redacted signature block]

28 April 2025

Our ref: RM/AM/COO3364 223515 28 04 25 001

Preferred Option Consultation,  
Development Strategy Team,  
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T: 01788 435 435

Dear Sir/Madam,

**RE: RUGBY PREFERRED OPTIONS DRAFT LOCAL PLAN REPRESENTATIONS SITE 53**

These representations have been prepared by 'Sworders' on behalf of the landowners of Site reference: 53 Oxford Road, Ryton-on-Dunsmore.

#### **HELAA Site Proforma**

Starting with the Housing and Economic Land Availability Assessment (HELAA), we support the findings that Site reference: 53 Oxford Road, Ryton-on-Dunsmore is potentially suitable for development however we wish to make some comments on the Suitability Commentary.

The Suitability Commentary states as follows *"Green Belt site. Previously considered within the landscape study - Landscape Sensitivity - Medium / High (RD09). SSSI IRZ for >100 homes 1ha non residential. Site abuts an area of Priority Habitat - Deciduous woodland to its north. An appropriate buffer may be required to mitigate any impacts. Site is not suitable for residential development due to its location and sustainability concerns. Further assessment required to determine appropriateness for small scale employment uses in this location."*

The first thing to note is that the HELAA Methodology pre-dates the December 2024 National Planning Policy Framework (NPPF) and therefore does not distinguish between Green Belt that is previously developed land, grey belt which is not previously developed, and then other Green Belt locations in accordance with the requirements at Paragraph 148 and the Annex 2 Glossary definition of Grey Belt. In the case of Site Reference 53, the site is previously developed land and is considered to meet the definition of Grey Belt as discussed in more detail below. Therefore, priority should be given to releasing this site from the Green Belt before releasing sites that are grey belt which are not previously developed, and other greenfield Green Belt locations.

Starting first with previously developed land, it should be noted that a submission (which has yet to be determined) was made to the Policy Team on 03 March 2025 to add this site to the Brownfield Land Register. The submitted Covering Letter which sets out the case that the site is previously developed land and is repeated below as Appendix A.



As detailed above, having assessed Site reference: 53 Oxford Road, Ryton-on-Dunsmore we consider that the site would meet the new definition of Grey Belt and thus should be considered favourably when considering Green Belt release pursuant with Paragraph 148 above. In reaching this view we have considered both the relevant paragraphs within the NPPF and the updated Green Belt Planning Practice Guidance (PPG).

The NPPF defines Grey Belt in Annex 2: Glossary as *“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt **comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.**”* [emphasis added].

As detailed above (and at Appendix A) the site comprises previously developed land.

We have then evaluated the contribution each assessment area makes to Green Belt purposes (a), (b), and (d), using the criteria outlined in the PPG. Paragraph 143 purpose (a) is ‘to check the unrestricted sprawl of large built-up areas’. The PPG clarifies that Villages should not be considered large built up areas. Considering the illustrative features, Site reference: 53 Oxford Road, Ryton-on-Dunsmore is considered to have a weak or no contribution to purpose (a) on the basis that Ryton-on-Dunsmore is a village and not a town and thus the site is not adjacent to or near to a large built-up area.

Paragraph 143 purpose (b) is ‘to prevent neighbouring towns merging into one another’. The PPG clarifies that this purpose relates to the merging of towns, not villages. Considering the illustrative features, Site reference: 53 Oxford Road, Ryton-on-Dunsmore is considered to have a weak or no contribution to purpose (b). Like purpose (a) above, this is because Ryton-on-Dunsmore is a village and not a town and thus the site does not form part of a gap between towns. In any case, the site does not form a gap between any settlements.

Paragraph 143 purpose (d) is ‘to preserve the setting and special character of historic towns’. The PPG again clarifies that this purpose relates to historic towns, not villages. Considering the illustrative features, Site reference: 53 Oxford Road, Ryton-on-Dunsmore is considered to have a weak or no contribution to purpose (d). As with purposes (a) and (b) above, this is because Ryton-on-Dunsmore is a village and not a town and thus the site does not form part of the setting of a historic town. In any case the site does not have a visual, physical, or experiential connection to the historic aspects of Ryton-on-Dunsmore which largely only comprise Ryton House (Grade II listed building and Grade II listed park and garden) to the East of the settlement and Church of St Leonard (Grade II\*) to the North.

Turning lastly to footnote 7, this states as follows *“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt [Green Belt excluded as per NPPF definition], Local Green Space, a National Landscape, a National Park (or*



*within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”* The site is not a habitats site (nor a potential Special Protection Area, possible Special Areas of Conservation or RAMSAR site), Site of Special Scientific Interest, Local Green Space, National Landscape, National Park (nor is it within the Broads Authority). The site is likewise not defined as a Heritage Coast, irreplaceable habitat and does not contain any designated heritage asset (nor does it contain any non-designated heritage assets of archaeological interest). The site is located entirely within Flood Zone 1 and is not at risk of coastal change. Accordingly footnote 7 would not provide a strong reason for refusing or restricting development.

It is noted that the Suitability consideration states that the site was previously considered in the Landscape Study and concluded the Landscape Sensitivity is Medium/High (RD09) however, the updated Landscape Sensitivity Assessment March 2025 concludes that the overall landscape sensitivity is low stating that *“This is a small site located to the south of Ryton-on-Dunsmore, next to two A roads (Oxford and Leamington Road). It is enclosed by trees and shrubs that restrict the views into and out of the site, except for the boundary with Leamington Road. Most of the site, which has an unremarkable landform is already developed. Minimal sensitivities are likely to arise from development.”* This has been noted in the Stage 2 Site Assessment Report and should be reflected in the HELAA.

An appropriate buffer could be provided to the Priority Habitat - Deciduous woodland to the North of the site by undertaking an Arboricultural Impact Assessment and ensuring no development sites within the root protection zones (RPZs) of the trees.

Whilst we support and agree with the conclusion that the site would be more appropriate for a small-scale employment generating use, we would contest that the site is not sustainable for residential development. The site is located some 250m from the Land at High Street, Ryton-on-Dunsmore which has a draft allocation for circa 35 dwellings and the defined development limits of Ryton-on-Dunsmore which is identified as a Main Rural Settlement in the settlement hierarchy. Ryton-on-Dunsmore provides good access to local services which include Provost Williams Church of England Primary School, College of Policing, Sports Connexion Leisure Club & Venue, The Co-operative Food, Ryton Recreational Grounds, The Blacksmiths Arms PH, Ryton on Dunsmore Village Hall and Summies House all of which can be accessed by active modes of travel using existing pedestrian infrastructure. The site likewise has great access to the employment opportunities on offer at Prologis Park Ryton immediately to the North of the site and benefits from good access to public transport infrastructure which includes a bus stop (Sky Blue Connexion), immediately Northeast of the site along the A445.

## **Stage 2 Site Assessment Report**

Starting with Transport, whilst the site has a PTAL score of 1a, it should be emphasized that the site is within 31m of the nearest bus stop. Whilst the bus service from the nearest bus stop is fairly infrequent, the site is also only a 9-minute walk/2-minute cycle from the Co-Op bus stop in Ryton

which provides a more frequent service to Rugby, Coventry and Bourton-on-Dunsmore via the 25 bus route.

Significantly, the site is also adjacent to the proposed Prologis Park West and Mountpark Employment Allocation at Policy S7 which would be accessible via existing pedestrian infrastructure from the site. The development requirements for Prologis Park West and Mountpark note that improvements to public transport and active travel will be required and details that this would likely include the creation of pedestrian and cycle links to link with existing routes on the Tolbar End Roundabout and to link with Ryton-on-Dunsmore. The proposed active travel route shown on the indicative plan at Page 121 could be extended Southward to link to the proposed new leisure road alongside a new pedestrian crossing over the A423/A445 roundabout to facilitate active travel between Site 53 and Prologis Park West and Mountpark (see below yellow line).



Further opportunities to improve transport sustainability could include the provision of a pedestrian crossing over the A445 between Site 53 and Sports Connexion Leisure Club and Venue and improvements to public transport services. These could be provided as a development requirement of an allocation and secured by way of a planning obligation.

Turning to Ecology, the assessment notes the proximity of Ryton Wood. It is not considered that this represents a significant constraint to the development of Site 53. Site 53 is separated from Ryton Wood by the Police Academy, Sports Connexion Leisure Club and Venue and both the A423 and A445



severing any ecological link. Indeed, this has not prevented the draft allocation of Prologis Park West and Mountpark which the indicative plan on Page 121 shows could provide a green space buffer.

Under 'Other constraints' it states that *"The site is entirely within the Green Belt, potentially making a strong contribution to at least one purpose."* As detailed above the site is previously developed land and is considered to meet the NPPF definition of Grey Belt as it doesn't strongly contribute to purposes (a), (b) and (d), indeed the contribution is assessed as weak or none.

We support the conclusion that Site 53 would be an option for a small-scale employment site however as detailed in our comments on the HELAA contest that the site is unsuitable for residential. With that said, given its location and proximity to Prologis Park, the site would be better utilised for a small-scale employment site.

### **Policy S3 Strategy for employment land and Policy S7 Employment Allocations**

#### Small Scale (Local) Employment Need

Paragraphs 5.2.15 and 5.2.21 in the Sustainability Appraisal establishes that there is a local need in Rugby for employment land (where needs are often met most effectively on sites below 25 ha) equating to 66.3ha (265,296sqm). This is consistent with the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper which identifies a Local Industrial Residual Need over the period 2021-45 equating to 63ha. This local need makes up some 23% of the total residual industrial land need figure to be addressed through the local plan in the Sustainability Appraisal (which equates to 284ha or 739,559m<sup>2</sup> of floorspace).

Whilst Policy S7 makes provision for 945,000m<sup>2</sup> of floorspace (over the total residual industrial land need figure) it makes no provision for 'local need' (on sites less than 25ha) as identified in the Sustainability Appraisal. This lack of small-scale employment allocations for local need is not based on the available evidence and thus the plan at present is not considered to have been positively prepared or justified and is thus not sound pursuant to Paragraphs 36(a) and (b). Given the scale of the allocations in Policy S7, it will also constrict the availability of employment land coming forward in the early parts of the plan period. This position is evident from Table 4.3 - Local Industrial Residual Need 2021-45 (Ha) in the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper which identifies that Rugby only has supply for 5ha worth of 'local need'/non-strategic sites over the proposed plan period to 2045. On this basis, we strongly disagree with the conclusion at Paragraph 5.4.93 which states *"Overall, there is no clear case for a growth scenario involving allocation of one or more small / mediumsized sites for employment land at the current time"*. Paragraph 5.4.93 does however then acknowledge that *"this is a matter that can be revisited subsequent to the current consultation / prior to finalising the Local Plan for publication under Regulation 19."* It is our view that that the provision of local needs small-scale employment sites should be considered at this stage.



To ensure the plan is positively prepared and justified in accordance with Paragraphs 36(a) and (b) the plan should seek to allocate some small-scale employment sites, such as Site 53, to meet the identified local need in the Sustainability Appraisal and the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper. This could be achieved simply by further allocations or by reducing the floorspace provision on the proposed allocations at Sites 64, 17, 14, 95 and 328.

It should be noted that Paragraph 5.4.93 in the Sustainability Appraisal recognises that Site 53 (along with Site 118) are the strongest performing small sites and should therefore be prioritised for when considering allocation of local needs small-scale employment sites. It also recognises there is a need to consider potential in-combination impacts with the nearby strategic employment growth at Prologis Park west and Mountpark. As discussed in more detail below, it would seem logical to allocate Site 53 for a small-scale employment use and release it from the Green Belt to align the extent of the proposed Green Belt release on the West side of the A423 as part of Prologis Park West and Mountpark (particularly when, as demonstrated above, Site 53 meets the definition of Grey Belt).

It is not considered that allocating Site 53 for a small-scale employment use would result in detrimental in-combination impacts with Prologis Park West and Mountpark. Site 53 is an existing commercial garden centre, as an existing employment generating use it already generates vehicle movements and does not cause any conflict with vehicle movements generated by Prologis Park. This has been accepted within the Transport section of the Stage 2 Site Assessment Report which finds that the surrounding roads have a congestion rating of only 5 (with 1 being the most congested and 6 being less congested). It is also the case that Paragraph 87 in the NPPF details that planning policies should make provision for clustering of knowledge and data-driven, creative or high technology industries.

#### Green Belt Release for Employment Uses

National policy contained within the National Planning Policy Framework (NPPF) December 2024 sets out the policy context for Green Belt release at Paragraphs 145 to 148 which have been repeated below:

Paragraph 145 - *“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. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”* [emphasis added]

Paragraph 146 - *“**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” [emphasis added]*

Paragraph 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.” [emphasis added]*

Paragraph 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.”**

The Preferred Option Consultation Documents proposes releasing a significant amount of land from the Green Belt for employment development. This includes North of Ansty Park, Crouner Fields Farm and Home Farm, Ansty and Prologis Park West and Mountpark which makes up 74% of the floorspace provision at Policy S7. Whilst there is no in principle objection to Green Belt release to meet the identified need for commercial development in accordance with Paragraph 146, these sites are prominently greenfield sites. It has not been demonstrated that the current strategy makes as much use as possible of suitable brownfield sites and that priority has been given to previously developed land in accordance with Paragraphs 147 and 148 respectively.

The Preferred Option Consultation Documents provides no evidence of justification for the significant amount of Green Belt release proposed on greenfield sites for employment allocations, in fact, the Green Belt Contribution Study, which should provide the evidence base for considering the contribution sites make to the five Green Belt purposes, has not been published with the Preferred Options Consultation and the Development Strategy Team have confirmed in email correspondence (submitted with these representations at Appendix B) that *“The Green Belt Contribution Study has been delayed following the publication of revised national guidance”*. As such, the current proposed



allocations on greenfield sites requiring Green Belt release have not been based on proportionate evidence and have not taken into account key changes to Green Belt policy (including the new Grey Belt designation and the priorities in Paragraph 148) in the December 2024 NPPF and revised Planning Practice Guidance and thus cannot be consistent with national policy. For these reasons the Plan as currently drafted is contrary to Paragraphs 36(b) and (d) and in turn should not be considered sound. As this is the case, Rugby should undertake a further Regulation 18 Preferred Options Consultation that provides evidence and justification of the exceptional circumstances required for Green Belt release for employment allocations on greenfield sites that is consistent with national policy as set out in the December 2024 NPPF.

As detailed above, Site 53 is considered to be both previously developed land and Grey Belt as defined in the NPPF Glossary. As such, when considering Green Belt release for employment allocations, this site should be considered sequentially preferable in accordance with Paragraphs 147(a) and 148 to grey belt which is not previously developed, and other greenfield Green Belt locations to ensure the plan is justified and consistent with national policy and thus sound pursuant to Paragraphs 36(b) and (d).

Taking into account both the identified 'local need' for small scale employment sites and the need to sequentially consider previously developed land in the Green Belt before releasing greenfield Green Belt land, it is our view that the proposed allocation at North of Ansty Park for circa 75,000m<sup>2</sup> should be reallocated and dispersed across multiple small-scale sites that are previously developed land and/or meet the definition of Grey Belt. Given the potential suitability within the HELAA and Stage 2 Site Assessment Report and the commentary in the Sustainability Appraisal, we consider Site 53 should be allocated for a small-scale employment use at Policy S7.

### Green Belt Boundaries

Following on from the above, whilst we support the release of Prologis Park West and Mountpark from the Green Belt, we consider that the boundary should be amended to ensure the remaining areas of Green Belt contribute to the five purposes at Paragraph 143. At present the proposed Green Belt boundary would extend to the A445 on the Western side of the A423/A445 roundabout yet on the East side of the roundabout Site 53 and The Dell remain in the Green Belt effectively resulting in a 'island' of Green Belt North of the A445. It is not considered that Site 53 strongly contributes to any of the five purposes at Paragraph 143 and The Dell would not require a Green Belt designation given it is proposed to be allocated as a Local Green Space under Policy W2 Open space and sports provision which would provide protection from development.

As detailed above, Site 53 has a weak or no contribution to purposes (a), (b) and (d). Turning to purpose (c) this states, "*to assist in safeguarding the countryside from encroachment*". Site 53 is considered to have a weak or no contribution to this purpose. As noted throughout these comments the site is already previously developed land. Site 53 is also bound to the North by Prologis Park, to the East by The Dell and to the South and the West by the A445 and A423 respectively (including the roundabout). Furthermore, there is existing development to the South of the A445 comprising Sports



Connexion Leisure Club & Venue. As such it is not considered that development of the site is safeguarding the countryside from encroachment.

Turning to purpose (e), this states *“to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”*. Site 53 is considered to have a weak or no contribution to this purpose. As noted throughout these comments the site is already previously developed land and therefore its redevelopment is encouraged at Paragraph 89 of the NPPF which states that ***“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”*** [emphasis added].

With regard to The Dell, the Planning Practice Guidance states at Paragraph: 010 Reference ID: 37-010-20140306 that ***“If land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.”*** [emphasis added]. With this in mind it is not considered necessary for The Dell to be designated as both Green Belt and Local Green Space and thus this is not consistent with national policy in the Planning Practice Guidance and is not sound pursuant to Paragraph 36(d).

Taking into account the above, it is considered that the Green Belt boundary should be taken to the North side of the A445 alongside the release of Site 53 and The Dell from the Green Belt. This would then align with the proposed extent of the Green Belt on the West side of A423. For reference, please see the below with the proposed Green Belt boundary shown in yellow.





As detailed above, the Green Belt Contribution Study has not yet been completed so we are unable to comment on the studies findings regarding the contribution each of these pieces of land make to the five purposes. As noted above, Rugby should undertake a further Regulation 18 Preferred Options Consultation that provides evidence and justification of the proposed Green Belt boundaries.

### **Policy S1 Settlement hierarchy**

Policy S1 sets out a Settlement Hierarchy for the district based on the Rural Sustainability Study December 2024 which identifies Rugby Town, Main Rural Settlements, Rural Villages, Countryside and Green Belt. The settlements are scored on their access to services, public transport and internet coverage. Nine Main Rural Settlement are defined, one of which is Wolvey, where 710 dwellings are proposed over 3 residential allocation sites. However, the Settlement Hierarchy does not distinguish between Wolvey and Wolvey Heath. The latter should be considered as a separate settlement in itself being somewhat detached from Wolvey separated by open countryside and the River Anker. Figure 2 of the Wolvey Neighbourhood Development Plan Made Version clearly shows two separate settlements. Whilst Wolvey boasts a number of services and facilities, Wolvey Heath is small settlement comprising only a bus stop. Wolvey Heath is not recognised in the Settlement Hierarchy, where we would consider it to fall under 'Other Rural Settlements' where only limited development will be permitted under policy S1. This would be consistent with Princethorpe and Broadwell (both identified as 'Other Rural Settlements'), being the most similarly sized settlements with 89 and 72 dwellings respectively whilst Wolvey Heath contains 82.

### **Policy S2 Strategy for homes**

#### Minimum Housing Need

The Planning Practice Guidance sets out how the minimum annual local housing need figure is calculated using the standard method at Paragraph: 004 Reference ID: 2a-004-20241212. Step 1 is to set the baseline which is calculated as 0.8% of existing housing stock for the area using the live tables on dwelling stock (Table 125). For Rugby the latest figure is 51,343 (2023). Therefore, the baseline is  $51343 \times 0.008$  which equates to 410.744 dwellings per annum.

Step 2 is an adjustment to take account of affordability. The affordability data used is the median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level (Table 5c). The mean average affordability over the five most recent years for Rugby is 7.75. The adjustment factor is therefore as follows:

$$((7.75-5)/5) \times 0.95 + 1 = 1.5225$$



The minimum annual local housing need figure = housing stock baseline x adjustment factor. Therefore, the minimum annual local housing need figure is 625 dwellings per annum (rounded down from 625.35774).

Policy S2 Strategy for homes in the Preferred Option Consultation Document March 2025 sets out that *“To meet our future need for housing, 12,978 new homes will be delivered in the period 2024-2045 (618 each year).”* As demonstrated above the minimum local; housing need figure should be increased to reflect the latest existing housing stock for Rugby and the latest median workplace-based affordability ratios. To this end the Housing and Economic Development Needs Assessment (HEDNA) is dated November 2022 and thus does not set out the standard methodology calculations as updated in December 2024 but instead uses the 2014-based Household Projections. At present none of the evidence base nor the Preferred Option Consultation Document March 2025 actually sets out how the 618 dwelling per annum figure is reached. One assumes the 618 dwellings per annum is derived from the table provided by National Government alongside the December 2024 NPPF however this does not take account of the latest data (this can be inferred from Paragraph 2.2.4 in the Sustainability Appraisal).

Paragraph 36(a) in the NPPF sets out that *“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:*

- a) *Positively prepared – providing a strategy which, **as a minimum, seeks to meet the area’s objectively assessed needs**<sup>20</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;”* [emphasis added]

Footnote 20 adds that that *“**needs should be assessed using a clear and justified method, as set out in paragraph 62 of this Framework**”* Paragraph 62 states that *“To determine the minimum number of homes needed, strategic policies should be informed by a **local housing need assessment, conducted using the standard method in national planning practice guidance**. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”* [emphasis added].

Taking into account the above, to ensure compliance with Paragraph 62 of the NPPF and Paragraph: 004 Reference ID: 2a-004-20241212 in the PPG and to thus ensure the plan can be found sound in accordance with Paragraph 36(a), Policy S2(A) should be updated to make provision of **625 dwellings per annum or 13,125 dwellings over the period 2024-2045** and the standard method calculations must be provided in an updated Housing and Economic Development Needs Assessment (HEDNA).

Policy S2 Strategy for homes at part B shows a total delivery over the plan period of 14,134 dwellings. Paragraph 1.6 details that *“Supply is allocated for 9% more than the minimum requirement as a buffer to increase the likelihood of the council being able to continually demonstrate a five-year housing land supply.”* Taking into account the above calculations a 9% buffer would require a housing provision over the plan period of **14,306 dwellings**. Accordingly, it is considered that the Plan should seek to allocate at least a further **172 dwellings**, in line with the current buffer, to ensure the Plan is truly



plan-led and to be able to continually demonstrate a five-year housing land supply. A further 172 dwellings should be allocated on those sites, such as Site 53, that are previously developed land and meet the definition of Green Belt before considering greenfield Green Belt sites.

#### Minimum Housing Need Buffer

Regarding the 9% buffer, it is not considered that this would provide sufficient flexibility to continually demonstrate a five-year housing land supply if some sites do not come forward, particularly when taking into account that small site windfalls make up some 7.4% of the current housing provision. With the small site windfall allowance taken into account (which cannot be relied upon to the same extent as an allocated site) it is considered that a 16.4% buffer (9% over the 7.4% small site windfall allowance) would be more appropriate. This surplus would be consistent with the 17% surplus in the adopted Local Plan 2011-2031 which the Inspector supported in Inspector's Report – 27 March 2019 stating "*I consider the soundness of the Plan's housing land supply in more detail under issue 6 below. However, in relation to the need for Lodge Farm, since the Housing Market Delivery Study was published, the housing land supply set out in the Plan has increased from 13,664 dwellings in the publication draft Plan to 15,369 homes at the point of submission. In the revised housing trajectory<sup>86</sup>, the allocation at Lodge Farm is projected to deliver 665 dwellings within the Plan period, representing around 4% of the total housing supply in the Plan. Whilst I note the site promoter's evidence that the Lodge Farm development could deliver more than this within the Plan period, without Lodge Farm the remaining housing land supply would still exceed the Plan's housing requirement of 12,400 dwellings by more than 17%, which would be a comfortable surplus.*" [emphasis added]. It should also be noted that even with a 17% buffer Rugby currently find themselves with a 5-year housing supply shortfall which has been accepted to be 4.6 years.

A 16.4% buffer would generate a **housing provision of 15,278 dwellings** over the plan period using the corrected housing need figure above. Interestingly this provision would sit between Growth Scenarios 1, 2 and 3 and Growth Scenarios 4 and 5 in terms of quantum as set out in the Sustainability Appraisal however it is considered that this additional delivery should be concentrated on sites such as Site 53, that are previously developed land and meet the definition of Grey Belt before considering greenfield Green Belt sites.

**A housing provision of 15,278 dwellings would deliver between 229 and 343 additional affordable homes** (only using the 20% and 30% provisions at Policy H2 and not the 45% provision required by Paragraph 157 in the NPPF, see below). This is particularly pertinent given the Housing and Economic Development Needs Assessment (HEDNA) sets out that the net need for Social/Affordable Rented Housing for Rugby is 407 per annum or 60% of the current housing provision in Policy S2.

#### Small Windfall Sites



Windfall sites are defined in the NPPF as sites not specifically identified in the development plan which are taken into account to produce the housing trajectory. Paragraph 75 of the NPPF requires LPA to provide compelling evidence to support their windfall allowance, taking into account historic windfall delivery rates and expected future trends. Rugby Borough Council has historically applied a windfall rate for sites of fewer than 5 residential dwellings. The current adopted Local Plan sets a windfall allowance of 630 dwellings between 2017 and 2031 which equates to 45 dwellings per annum. There is no technical evidence provided to justify the figure of 45 dwellings nor an increase in windfall allowance.

Policy S2 sets out a windfall expectation of 1,050 over the plan period equating to 50 dwellings per annum. Having reviewed the number of approvals for residential applications (including Prior Approvals for fewer than 5 dwellings, over the last 5 years since April 2020 we would challenge this number and consider an appropriate windfall allowance based on the previous 5 years would be around 25 dwellings per annum (please see below table).

<b>Year</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025 (to date)</b>	<b>Total</b>
<b>Number of dwelling granted on windfalls sites of &lt;5 dwellings</b>	15	26	25	14	32	10	<b>122</b>

Appendix C shows all residential Windfall approvals over the last 5 years. This would equate to 525 dwellings over the plan period, a reduction of 525 dwellings over the plan period. To ensure the plan is plan led, a further 525 dwellings should be provided through further residential allocations on at the most sustainable sites adjacent to the proposed settlement edge to Rugby such as Land at Ashlawn House, Ashlawn Road, Rugby (Site 52) and Gorse Farm, Ashlawn Road, Rugby (Site 53) that would not require further Green Belt release.

It is not considered that the current projection of 1,050 dwellings via Small site windfalls (fewer than 5 homes at 50 homes per year) at Policy S2 based on proportionate evidence and is therefore not justified and not sound pursuant to Paragraph 36(b).

## **S6 Residential allocations**



## Spatial Strategy

Starting with the spatial strategy, we agree with the Preferred Option Consultation Documents dispersed spatial strategy that avoids allocating very large sites for the reasons outlined in the questionnaire. To this end we would strongly disagree with the allocation of the two alternative sites, Lodge Farm and Cosford and Newbold-on-Avon (NW Rugby) as detailed in Growth Scenarios 4 and 5 in the Sustainability Appraisal. Whilst we would support the quantum of development set out in Growth Scenarios 4 and 5, sites of this scale present a significant number of challenges particularly as they relate to deliverability and infrastructure. This was recognised by the Inspector when they removed Lodge Farm as an allocation within the adopted Local Plan. The Inspectors Report stated that *“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**. Notwithstanding the justification set out in the Plan and the supporting evidence, there is not currently a need for this allocation to meet the Plan’s housing requirements. Indeed without it the Plan provides for an excess of housing land supply over the identified requirement of more than 17%. In the light of this, I find that **the harm likely to be caused by development... would not be outweighed by the benefits.**”* [emphasis added].

The Sustainability Appraisal highlights that there are no known options for delivering a new settlement alongside a train station which would make such options car dependent and scores Growth Options 4 and 5 poorly with regard to accessibility, air quality, landscape and transport.

Whilst we support a dispersed spatial strategy, development should be targeted toward sites that are previously developed land and/or would make use of Grey Belt Land. We also have concern about the scale of housing provision directed toward Wolvey (particularly Wolvey Heath, see comments on Policy S1) and Newton which both score more poorly than Ryton-on-Dunsmore for sustainability within the Rural Sustainability Study.

The proposed allocations at Wolvey would see the total number of dwellings within Wolvey increase from 275 to 925 (a 336% increase), and the number of dwellings within Wolvey Heath increase from 82 to 142 (a 173% increase). This would have a significant impact on the settlements character and townscape in addition to its residents. It would also result in the merging of the two settlements, both of which lie within the green belt.

As detailed within the Rural Sustainability Study Wolvey has limited access to shops and services (including no pharmacy, leisure centre, bank, dentist or garage). Wolvey also has poor access to public transport infrastructure with no railway station and a poor bus service when compared to other main rural settlements. Wolvey also scores poorly for internet access being outperformed in this respect by a number of other rural settlements. Whilst Wolvey Heath is assessed as part of Wolvey, Wolvey Heath itself has zero services or facilities and a poor bus service provision.



The amount of allocated housing for Wolvey totalling 710 dwellings would represent strategic growth. The Sustainability Appraisal states *“there is a clear need to test a growth scenario that does not involve strategic growth to the south of the village”*. There is no secondary school within Wolvey, (the nearest being in Hinckley) and primary school capacity is an issue as recognised in the Sustainability Appraisal. Also, the distance from an ‘A’ road, makes the sustainability of Wolvey for such a significant proportion of residential allocation questionable.

Taking the above into account Wolvey is not a sustainable settlement for development and future occupants would likely be reliant on the private car to access shops, services and employment opportunities. It is therefore considered that these allocations should be directed to more sustainable sites that make use of previously developed land and/or utilise Grey Belt land such as Site 53 that would in turn not require further greenfield Green Belt release.

Turning to Newton, whilst the proposed allocation would be more commensurate to the size of the settlement, Newton is the only Other rural settlement to receive an allocation. As an Other rural settlement Newton scores poorly for sustainability in the Rural Sustainability Study with no leisure centre, bank, café, dentist early years nursery or garage. It likewise has poor access to public transport infrastructure with no railway station and a poor bus service. Clearly future occupants would be reliant on the private car to access shops, service and employment opportunities with the Rugby urban area. Newton and Biggin had a Neighbourhood Area designated on 20 September 2023. Given the size of the settlement, it is considered that residential development should come forward via a Neighbourhood Plan whereby local residents would have the opportunity to have a Referendum on said development. Alternatively, residential development could be delivered on this site by way of small site windfall. It is thus considered that the circa 25 dwellings draft allocated at Hillcrest Farm would be better directed to more sustainable sites that make use of previously developed land and/or utilise Grey Belt land such as Site 53 that would in turn not require further greenfield Green Belt release.

### Residential Green Belt Release

National policy contained within the National Planning Policy Framework (NPPF) December 2024 sets out the policy context for Green Belt release at Paragraphs 145 to 148 which have been repeated below:

Paragraph 145 - *“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. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”* [emphasis added]



Paragraph 146 - *“**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”* [emphasis added]

Paragraph 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.”* [emphasis added]

Paragraph 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.”*

The Preferred Option Consultation Documents proposes releasing a significant amount of land from the Green Belt for residential development. Residential allocations requiring Green Belt release at Wolvey, Brinklow, Long Lawford, Newbold on Avon, Stretton-on-Dunsmore and Wolston make up 1,748 dwellings or 52% of all new residential allocations at Policy S6. As detailed above, Paragraph 145 in the NPPF requires that Green Belt boundaries should only be altered where exceptional circumstances are **fully evidenced and justified**. The Preferred Option Consultation Documents provides no such evidence of justification for the significant amount of Green Belt release proposed, in fact, the Green Belt Contribution Study, which should provide the evidence base for considering the contribution sites make to the five Green Belt purposes, has not been published with the Preferred Options Consultation and the Development Strategy Team have confirmed in email correspondence (submitted with these representations at Appendix B) that *“The Green Belt*



*Contribution Study has been delayed following the publication of revised national guidance". As such, the current proposed allocations requiring Green Belt release have not been based on proportionate evidence and have not taken into account key changes to Green Belt policy (including the new Grey Belt designation and the priorities in Paragraph 148) in the December 2024 NPPF and revised Planning Practice Guidance and thus cannot be consistent with national policy. For these reasons the Plan as currently drafted is contrary to Paragraphs 36(b) and (d) and in turn should not be considered sound. As this is the case, Rugby should undertake a further Regulation 18 Preferred Options Consultation that provides evidence and justification of the exceptional circumstances required for Green Belt release that is consistent with national policy as set out in the December 2024 NPPF.*

It is also noted that many of the proposed residential Green Belt releases do not utilise previously developed land. This includes Sites 84, 96, 337, 315, 316, 75, 81, 134 and 39. In accordance with Paragraphs 147 and 148, the strategy should make as much use as possible of suitable brownfield sites and prioritise previously developed land, such as Site 53, before considering grey belt which is not previously developed, and then other Green Belt locations. No evidence has been provided that this sequential approach to Green Belt release has been followed and accordingly the plan is not considered to be justified or consistent with national policy and thus not sound pursuant to Paragraphs 36(b) and (d).

We would also like to draw attention to Site Ref 6 Land East of Fosse Way opposite Knob Hill which is draft allocated for circa 3 dwellings. It is not considered necessary to release a site from the Green Belt for circa 3 dwellings where this provision could easily be met by other allocations simply by increasing density or by small site windfall, particularly if it is to remain outside of the Stretton-on-Dunsmore settlement boundary. This site may well also meet the definition of Grey Belt in the NPPF Glossary and could therefore be brought forward outside of the Local Plan without Green Belt release. We cannot see that there exists exceptional circumstances to justify this change to the Green Belt and thus we consider this draft allocation to be contrary to Paragraphs 146-148 and not sound subject to Paragraph 36(b) and (d).

## **H2 Affordable housing**

We agree with the affordable housing provisions set out within Policy H2(A)(i) and (ii) for the Rugby urban area and elsewhere in the borough. However, Policy H2(A) needs to be updated to reflect the new 'Golden Rules' set out in Paragraph 157 of the NPPF. Specifically, Policy H2(A) needs to set out that affordable housing provision for Major developments on land released from the Green Belt through preparation of the plan will be 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, which in this case would be 45%. This too needs to be reflected in all of the development requirements to the draft allocations that require Green Belt release and would comprise Major Development. This includes at least the following draft site allocations:

- Site ref 84, Land South of Leicester Road, Wolvey (60 dwellings)



- Site Ref 96 Land at Coventry Road Wolvey (500 dwellings)
- Site Ref 309 Land North of the B4109, Wolvey (150 dwellings)
- Site Ref 315 Land South of Brinklow (340 dwellings)
- Site Ref 337 West Farm and Home Farm Brinklow (75 dwellings)
- Site Ref 316 Land at Long Lawford (400 dwellings)
- Site Ref 75 Lea Crescent Newbold (20 dwellings)
- Site Ref 134 Land North of Plott Lane (105 dwellings)
- Site Ref 81 Land West of Fosse Way (40 dwellings)
- Site Ref 39 Dyers Lane, Wolston (15 dwellings)

Accordingly, the Preferred Options Draft Local Plan is currently not in accordance with Paragraphs 67, 156 and 157 and is therefore not considered to be consistent with national policy and is thus not sound subject to Paragraph 36(d).

As noted above the Housing and Economic Development Needs Assessment (HEDNA) sets out that the net need for Social/Affordable Rented Housing for Rugby is 407 per annum or 60% of the current housing provision in Policy S2. Given the new 'Golden Rules' would require Major developments on land released from the Green Belt to deliver 45% affordable housing, allocating sites that are previously developed land and meet the definition of Grey Belt, such as Site 53, would ensure greater provision of affordable housing and would go further to addressing the significant need identified in the HEDNA.

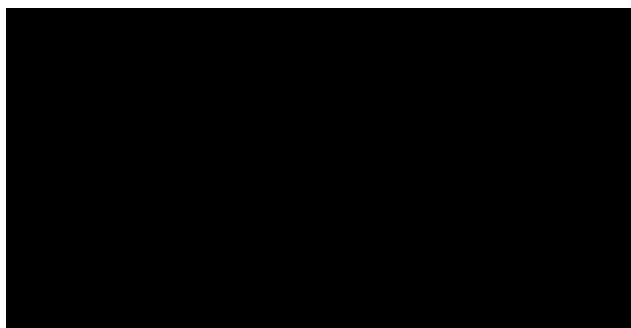
### **Conclusions and Suggested Amendments**

Taking into consideration all of the above, the following amendments to the plan are suggested to ensure it is positively prepared, justified, effective and consistent with national policy such that it can be considered sound in accordance with Paragraph 36 of the NPPF:

1. The plan should seek to allocate some small-scale employment sites, such as Site 53, to meet the identified local need in the Sustainability Appraisal and the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper.
2. Replace the employment allocation at Policy S7 of North of Ansty Park (Site 14) with multiple small-scale sites that are previously developed land and/or meet the definition of Grey Belt such as Site 53.
3. Amend the Green Belt boundary at Prologis Park West and Mountpark such that Site 53, The Dell, The Policing College and Sports Connexion Leisure Club & Venue are released from the Green Belt.
4. Wolvey Heath is distinguished from Wolvey in the Settlement Hierarchy at Policy S1 and is listed under S1A(iii) as an other rural settlement.
5. The Housing and Economic Development Needs Assessment (HEDNA) is updated to include the new standard methodology calculation for the Local Housing Need.



6. Policy S2A is updated with the correct Local Housing Need and should read as follows “To meet our future need for housing, **13,125** new homes will be delivered in the period 2024-2045 (**625** each year).”
7. The buffer in Policy S2 Paragraph 1.6 should be increased from 9% to 16.4% and the total number of new homes at Policy S2B increased to at least **15,278**.
8. The Small site windfalls (fewer than 5 homes at 50 homes per year) at Policy S2B should be decreased from 1,050 to **525** and the number of allocations under Policy S6 increased accordingly to reflect the difference.
9. Remove allocations and Green Belt release at Wolvey and Wolvey Heath (Sites 84 and 96) at Policy S6 and replace with allocations that utilise previously developed land and/or utilise Grey Belt such as Site 53.
10. Remove allocation at Newton (Site 87) at Policy S6 and replace with allocations that utilise previously developed land and/or utilise Grey Belt such as Site 53.
11. Publish the Green Belt Contribution Study and undertake a further Regulation 18 Preferred Options Public Consultation.
12. Reduce the number of housing allocations at Policy S6 requiring greenfield Green Belt release and replace with allocations that utilise previously developed land and/or utilise Grey Belt such as Site 53.
13. Remove allocation of Fosse Way, Stretton-on-Dunsmore (Site 6) at Policy S6.
14. Update Policy H2A to reflect the ‘Golden Rules’ 45% affordable housing requirement on Major Developments (15% higher than the 30% at H2A(ii)).
15. The development requirements for Sites 84, 96, 309, 315, 337, 316, 75, 134, 81, 39 need updating to reflect the ‘Golden Rules’ 45% affordable housing requirement.





**Appendix A – Brownfield Land Register Covering Letter (Separate Document)**



## Appendix B - Email Correspondence with Development Strategy Team Dated 26 March 2025

Good afternoon [REDACTED]

The Stage 2 Site Assessment report is now uploaded to the website.

There are other evidence documents which are not yet available. I will address each you list in turn:

- The HRA Appropriate Assessment will be available at Regulation 19 stage
- The Green Belt Contribution Study has been delayed following the publication of revised national guidance. We intend to publish this once we have it, though we do not have a confirmed timescale.
- The SFRA Stage 2 is in progress, though following the issue of new flood mapping from the EA the timescale for receipt is unclear.

Regards,

[REDACTED]

## Appendix C - Small site windfalls (fewer than 5 homes) since April 2020

LPA Ref	Location	Proposal	Number of Units	Decision Date	Notes
R25/0026		Change of Use - Conversion of agricultural building to residential dwelling	1	To be determined	
R24/0994	Shelford Lodge Barn,	Conversion of existing barn to dwellinghouse	1	15/01/25	



	Lutterworth Road, Wolvey				
R24/0966	Manor house, 28, church hill, stretton-on-dunsmore,	Proposed conversion of 2 barns to dwellings, with associated parking and landscaping	2	To be determined	
R24/0795	52, Brockhurst lane, Monks Kirby,	Construction of a 2-storey dwelling.	1	27/02/25	
R/24/0914	Land adjacent to and south of Church Farm, Church Street, Churchover	Erection of a dwelling, garage, car-port and associated parking	1	13/02/25	
R24/0838	22, Dunsmore Avenue, Rugby,	Erection of two-storey detached dwelling following demolition of existing bungalow	1	29/11/24	
R24/0759	72, Lime Tree Avenue, Rugby	Demolition of existing bungalow and construction of 4 bedroom dwelling with associated carport/garage	1	24/12/24	
R24/0537	17, Lawford Lane, Bilton, Rugby	Demolition of existing dwelling and construction of 2 no. dwellings, with associated parking and landscaping.	2	To be determined	
R24/0843	The Old Pigsty, Brookfield farm, main street, Withybrook	Prior approval under Class Q (a) and (b) for change of use of agricultural building and land within it's curtilage to 1no. dwelling with associated building operations.	1	28/02/25	
R24/0792	Ivy House, Church Street, Churchover	Conversion of existing ancillary building to separate 3 bedroom dwelling, with associated parking and garden space.	1	22/11/24	
R24/0690	Marston Hall Farm, Priory Road, Wolston	Change of use of agricultural building and land within it's curtilage to 4no. dwellinghouses and for	4	17/01/25	



		associated building operations			
R24/0783	Nethercote Barn, Flecknoe	Prior approval change of use of agricultural building to 1 no. dwellinghouse (Class Q).	1	15/08/24	
R24/0634	Grounds Farm, Wolston Lane, Wolston	Prior approval for proposed conversion of existing barn to a dwelling with associated garden and parking.	1	01/10/24	
R24/0737	Brickyard Cottages, Coventry Road, Rugby	Demolition of existing workshop with the erection of a new dwelling and associated parking	1	04/02/25	
R24/0691	Marston Hall Farm, Priory Road, Wolston	Change of use of agricultural building and land within it's curtilage to 1no. dwellinghouse and for associated building operations	1	13/09/24	
R24/0495	Merlin Field Farm, Leamington Hastings	conversion of agricultural building to 4 no. dwellinghouses including insertion of first floor accommodation	4	23/09/24	
R24/0478	274 Newbold Road, Rugby	erect a new three bedroom dwelling with associated parking and garden	1	23/01/25	
R24/0469	9 Lawford Road, Rugby	Prior Approval: Change of use – commercial/business/service to dwellinghouses	1	19/07/24	
R24/0319	Ivy Houe, Church Street, Churchover	Subdivision of existing dwelling to form 2 separate 3 bedroom dwellings including external alterations and addition of porch to side.	1	24/07/24	
R24/0321	Stearn Meadows Barns, Willoughby	Class Q Prior Approval for the conversion of agricultural barn to 1no. residential dwellinghouse (Class C3)	1	24/12/24	



R24/0298	5 Regent Street, Rugby	Prior Approval: Change of use of first and second floor offices to dwelling houses	2	23/05/24	
R24/0299	1 Regent Street	Prior approval application for change of use of first and second floor offices to dwelling houses (resubmission of previously approved application R19/0079).	3	28/05/24	
R24/0300	Waldings Farm, Barby Lane	Prior approval change of use of agricultural building and land within its curtilage to 3no. dwellinghouses and associated works.	3	30/07/24	
R24/0271	Land adj to 341 Hillmorton Road	Erection of a dwelling house	1	30/04/24	
R24/0043	70a Oxford Street, Rugby	Erection of 2 no. 2-bedroom semi-detached dwellings (C3)	2	01/08/24	
R23/0006	Homestead Farm. Coventry Rd, Dunchurch	Approval of reserved matters (appearance, landscaping, layout and scale) - erection of four detached dwellings	4	09/11/23	Pursuant to outline planning approval R19/0878
R22/1073	Ellesmere, Southam Road, Dunchurch	Construction of two new dwellings fronting Sandford Way in the rear gardens of Ellesmere, Langdale and The White House, Southam Road	2	14/11/23	
R22/1030	Grange Farm, London Road, Ryton on Dunsmore	Change of use of Agricultural barn to 4 no. dwellings and associated parking and landscaping	4	02/12/22	
R22/1021	Merlin Field farm, Gibraltar Lane	Prior approval for the change of use of an existing agricultural building to 4no. dwellinghouses and associated building works.	4	28/11/22	
R22/0828	Hilmorton Yard, The Locks, Rugby	Demolition of industrial unit (use class B2) and the erection of 2 pairs of semi-	4	10/05/23	



		detached 3 bedroom dwellings (4 units).			
R22/0818	Two Hoots Farm, Lutterworth Road	Conversion of buildings to two residential dwellings, including removal of mobile home and toilet block	2	Refused 18/11/22	Allowed on Appeal 16/01/24
R22/0654	Land adj Homestead Farm, Dunchurch	Residential development comprising of 4 detached dwellings, garaging, access road and associated works (outline - access only)	4	08/03/24	
R22/0644	Gemini, Southam Road, Dunchurch	Erection of 2 new dwellings	2	12/05/23	
R22/0586	5, MALT SHOVEL INN, CHURCH ROAD, RYTON-ON-DUNSMORE	Erection of 2no. dwellings and associated garages (Outline All Matters Reserved, Except for Access)	2	08/11/23	
R22/0390	53 Lower Road, Barnacle	Subdivision of existing dwelling to create two dwellings	1	02/08/22	
R21/0998	LAND ADJACENT TO MASTERS COURT, LEAMINGTON HASTINGS ROAD, BIRDINGBURY	4 new detached dwellings and related facilities (reserved matters application for appearance, landscaping, and scale following)	4	22/06/22	Pursuant to outline planning approval R18/1987
R21/1223	15 Church Road, Shilton	Application for reserved matters approval of access, appearance, landscape, layout and scale, for the construction of 4no. dwellings with associated access, parking and turning with all matters reserved other than access and appearance	4	07/06/22	Pursuant to outline planning approval R18/1641
R21/1208	THE LATCH, COVENTRY	Proposed demolition of existing dwelling and erection of 2 no new build	1	22/06/22	



	ROAD, THURLASTON	dwellings, with associated parking and landscaping			
R21/1130	MARSTON MILL FARM, PRIORY ROAD, WOLSTON, COVENTRY,	Prior Approval: Change of use - agriculture to 3 no. dwellings	3	28/03/24	
R21/0872	130 Ashlawn Road, Rugby	proposed 3 no. new build dwellings with detached garages and associated car parking and landscaping	3	Refused 10/02/22	Allowed on Appeal 08 Sep 2022
R21/0880	Foose Farm, Fosse Way, Monks Kirby	Conversion of two traditional brick & tiled agricultural buildings into two dwellings	2	15/03/22	
R21/0696	Land on the south east side of, buckwell lane, clifton upon dunsmore	Erection of 2 dwellings, together with the creation of a new access and associated works.	2	20/10/22	
R21/0763	merlin field farm, gibraltar lane, leamington hastings, rugby,	Agricultural Prior Approval for change of use of agricultural building to 4no. dwellings and associated works	4	09/08/21	
R21/0573	flecknoe farm stud and livery, flecknoe village road, flecknoe	Proposed conversion and partial demolition of equestrian barns to three residential dwellings	3	15/12/21	
R21/0561	111 Crick Road, Rugby	Demolition of existing bungalow and the erection of two detached 4 bedroom dwellings, with associated landscaping	1	11/11/21	
R20/1037	Home farm, birdingbury road, bourton- on-dunsmore	Conversion of an agricultural building to create two dwellings together with external alterations	2	27/08/21	
R20/0933	Land Adjacent April Cottages, Railway Street, Long Lawford	Erection of a pair of 2 bedroom semi-detached dwellings	2	22/01/21	



R20/0758	SPRINGFIELD, CAWSTON LANE, DUNCHURCH, RUGBY,	Demolition of existing structures and erection of 2 no. detached dwellings (Resubmission of previously approved scheme R19/0212 dated 19/06/2019).	2	05/02/21	Resubmission of R19/0212
R20/0733	23, LUTTERWORTH ROAD, PAILTON, RUGBY	Demolition of existing dwelling, formation of a new site access and the erection of 4 (no) dwellings, two detached garages and associated parking	3	19/08/21	
R20/0538	LAND AT WHARF FARM, CRICK ROAD, RUGBY	Erection of 2 dwellings with associated works and landscaping. (Approval of reserved matters in relation to outline planning permission R15/1702 dated 11/07/2017)	2	18/02/21	
R20/0341	shoulder of mutton inn, brookside, stretton-on- dunsmore,	Proposed conversion of former public house and coach house into 2no. dwellings	2	17/07/20	
R20/0309	250, NEWBOLD ROAD, RUGBY	Erection of 2 dwellings	2	25/05/21	
R20/0251	rear of 100, 102 and 104 magnet lane, magnet lane, bilton	Erection of 2 dwellings	2	21/07/20	
R20/0189	61 bawnmore road, bilton, rugby,	Proposed demolition of existing dwelling and garage and erection of 2 new build dwellings. (previously approved under R18/1293 approved 31st July 2019)	1	12/04/21	Amendment to previous approval R18/1293
R20/0064	37, lower street, rugby,	Demolition of existing outbuildings and construction of 3 new dwellings and a new garage for No. 37 Lower Street.	3	22/10/20	
R19/0878	HOMESTEAD FARM,	Outline application for four new dwellings including	4	25/06/2020	



	COVENTRY ROAD, DUNCHURCH	access on land adjacent to Homestead Farm			
R19/1246	MARANTHA, COVENTRY ROAD, RUGBY	Erection of four dwellings (existing dwelling to be demolished) (outline application to include layout with appearance, landscaping, access and scale reserved)	4	31/01/2021	
R19/1495	Land adjacent 31, wood lane, shilton, coventry	Outline planning application for the construction of 2 no. dwellings, all matters reserved.	2	20/03/2020	
R19/1539	unit 1-2, Munro business park, Marton road, Birdingbury, rugby	conversion of existing barn to form two new dwellings and associated parking	2	26/03/2020	
R19/0119	Land adj 26 The Green, Long Lawford	Erection of one dwelling with associated parking.	1	07/08/2020	