

14 May 2025

Preferred Option Consultation,
Development Strategy Team,
Town Hall,
Evreux Way
Rugby
CV21 2RR

Sent by Email to: localplan@rugby.gov.uk

Dear Sirs

**RUGBY BOROUGH LOCAL PLAN – PREFERRED OPTIONS (2025)
SUBMISSION OF REPRESENTATIONS ON BEHALF OF INSIDE LAND GROUP LTD**

Williams Gallagher is instructed to submit these representations on behalf of Inside Land Group Ltd who are the promoters of land at Clifton-Upon-Dunsmore (Ref 202) proposed for allocation under Policy S6 to Rugby Borough Council (RBC) regarding the Rugby Borough Plan Local Plan – Preferred Options (RBLP). In providing the representations, we note that the consultation is a Reg 18 consultation and that further consultation (Reg 19) is anticipated to take place in early 2026.

Please therefore find attached:

- Appendix 1 – Contact information as requested through your online portal, where relevant.
- Appendix 2 – Representations based on the online portal questions format for those sections relevant to Inside Land Group Ltd.

Inside Land Group Ltd also reserves the right to make additional comment during future consultations.

[Redacted]
[Redacted]
[Redacted]

APPENDIX 1 – CONTACT INFORMATION

Name:	<div></div>
Organisation:	<div></div>
Resident:	Other
Contract email:	<div></div>

<div></div>	on behalf of:	Inside Land Group Ltd
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APPENDIX 2 - REPRESENTATIONS

1. Objectives	
Question 1: To what extent do you agree with the selection of these objectives?	Agree
Question 2 – Reasons for Answer to Question 1	<p>Support the continued growth of the Borough but an additional objective “to provide housing on a range of sites throughout the borough to meet the needs of its residents”</p> <p>As set out, the objectives seem to focus on growth in line with the Economic Strategy which is not itself principally focussed on housing delivery.</p>
2. Strategy for Homes and Residential Allocations (Policies S2-S6)	
Question 3. To what extent do you agree with the more dispersed overall spatial strategy for new homes?	Strongly Agree
Question 4. What are the reasons for your answer to question 3 and if you disagree with the proposed spatial strategy what alternative should we pursue?	<p>The approach to reduce overreliance of housing delivery on a smaller number of larger strategic urban extensions is welcomed.</p> <p>The identification of smaller sites and their dispersal to Main Rural Settlements is more in keeping with guidance in para 73 of the NPPF which encourages identification of small and medium sized sites and which also help support local services/facilities and provide more options for people wishing to stay in their local areas where available housing may be currently limited.</p>
Question 5. Is there a site that is proposed to be allocated for housing in policy S6 that you do not support? If so, which site and why?	No – but we express strong support for the Clifton Upon Dunsmore sites that are proposed as allocations in preference to other sites that have been previously promoted but rejected on the basis that the sites identified as proposed allocations are better related to the existing settlement form and better in terms of active travel options.
<p>Question 6. The development sites annex lists development requirements for the allocated sites.</p> <p>Are there additional or different requirements we should be seeking? Please specify which site you are referring to.</p>	<p>We strongly support the proposed allocation of Site ref 202 under Policy S6.</p> <p>The general development principles/requirements for the Site as set out in the Annex. We would question the provisions shown on the site allocation plan as potentially being too prescriptive and their potential effect in delivering the required amount of development. The proposals should be clear that the precise locations of connections will be determined through the consideration of future planning applications.</p>
5. Climate (Policies CL1-CL4)	
Question 11. To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?	Generally supportive with some caveats.

Question 12. What are the reasons for your answer to question 11?	Policies CL3 and CL4 are considered to be reasonable and proportionate. However, Policy C1 could be considered to be overly onerous if it is seeking to apply greater standards or measures than required nationally and could impact on the rate of housing delivery. Clear and justified reasoning will be required for the policy to be supported at any future Examination.
8. Environment (Policies EN1-EN8)	
Question 17. To what extent do you agree with the document's environmental policies?	Generally support with some caveats.
Question 18. What are the reasons for your answer to question 17?	<p>In the main the policies seem reasonable. However there are elements that might have onerous impacts on the delivery of the amount of housing to be provided. In particular the requirement for the post development tree canopy coverage of a site to be at least 20%. The benefit of trees within development from a landscape, biodiversity, visual and urban cooling effect is accepted.</p> <p>However, has the proposed requirement been tested to determine the potential impact on each allocated site, particularly the small to medium sites, to determine whether the impact, along with requirements for BNG and SUDS would have an adverse effect on making the effective use of land, the potential impact on layout and therefore density, and whether it could have unintended consequences on delivering the amount of development being planned for?</p>
9. Housing (Policies H1-H8)	
Question 19. To what extent do you agree with the document's housing policies?	Generally support but with some caveats.
Question 20. What are the reasons for your answer to question 19?	<p>The provisions of H1 are noted but the Policy needs to be clear that it does not prevent a wholly affordable housing development (of mixed tenures within the definition of affordable housing) coming forward on suitable sites..</p> <p>The proposed tenure mix in Policy H2 is noted but it is unclear why affordable rented homes have been excluded. These provide accommodation for those who do not qualify for social rented housing but This would appear inequitable and contrary to the national provisions seeking mixed tenure development and with affordable rent falling within the definition of affordable homes. This aspect of the policy should be reconsidered.</p> <p>Policy H7 – have some of the provisions been tested against all housing typologies to ensure that they deliver development at appropriate density?</p> <p>For example, to achieve a 60sqm garden for a 2-bed house would require a garden length 15m which, if replicated across a development could potentially impact on the amount housing delivered.</p> <p>Clarity on how the standards have been developed will need to be provided for and justified as part of the evidence base.</p>

10. Wellbeing (Policies H1-H8)	
Question 21. To what extent do you agree with the document's wellbeing policies?	Neither agree nor disagree.
Question 22. What are the reasons for your answer to question 21?	Proposed open space standards are noted.
11. Design (Policies D1-D5)	
Question 23. To what extent do you agree with the document's design policies?	Neither agree nor disagree.
Question 24. What are the reasons for your answer to question 23?	Provisions are noted but it needs to be clear whether the impacts of these have been considered alongside are consistent with, not contrary to other proposed policies.
12. Infrastructure (Policies I1-I6)	
Question 25. To what extent do you agree with the document's infrastructure policies?	Generally support with caveats.
Question 26. What are the reasons for your answer to question 25?	We understand that cul-de-sacs are not a preferred highways layout and their permeable. Connected streets add to the vitality of a place. However, in some instances they do provide options to ensure effective use of land it made. A blanket denial of their use should be deleted.
	Furthermore, in order for development to reflect local character, particular in heritage areas or older villages, it would be helpful for a policy to have a design led approach to highway design and layout to provide flexibility rather than the blanket imposition of technical standards which always lead to an overengineered layout.
	Have the parking standards being required to be met been tested against other policies on design or density? Their imposition will potentially impact on housing typology eg parking requirement for a two-bed terraced house would not be capable of being accommodated on plot.
	We note the proposal to include a £X figure and that this is effectively a tariff based approach to delivery of the school. This is a borough wide approach to deliver one school. It is unclear whether all pupils generated by the proposed developments in the plan will attend this school and therefore whether the obligation is reasonable, and well related in scale to the relevant development. If secondary education is to be provided by all, it would be more appropriate to be through CIL funding.