

Warwickshire Property and Development Group

Barnwell Farm (Site ID 18)

Rugby Local Plan

Regulation 18 Consultation – Preferred Options

May 2025



1. Introduction

Question 1 – To what extent do you agree with the selection of these objectives?

No response

Question 2 – What are the reasons for your answer to Question 1?

No response

2. Strategy for Homes and Residential Allocations (Policies S2 and S6)

Question 3 - To what extent do you agree with the more dispersed overall spatial strategy for new homes?

No response

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?

No response

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 response

Question 6 - The development sites annex lists development requirements for the allocated sites. Are there additional or different requirements we should be seeking? Please specify which site you are referring to.

No response

3. Strategy for Employment Land and Employment Allocations (Policies S3 and S7)

Question 7 – To what extent do you agree with the strategy for employment land?

Disagree

Question 8 - What are the reasons for your answer to question 7? If you disagree, what alternative location(s) would be better and why?

Employment Need Evidence

Whilst Warwickshire Property Development Group do not disagree with the allocations made with the Preferred Options draft Local Plan, the Group raise into question the employment need evidence to ensure that Rugby Borough Council have accounted for **all** of the economic need of Borough and are making the appropriate amount of allocations to account for this need.

The Council's evidence in regards to the amount of employment land required for the Plan period 2045 does not account for the latest completions data to 2023/24 as a Plan period which begins in 2024 should do. Rather, the West Midlands Strategic Employment Sites Study (WMSESS) only accounts to 2021/22. This issue is not resolved by the HEDNA-WMSESS Alignment Paper as this does not provide sufficient detail, and whilst Rugby has experience growth in the sector in recent years, the Alignment Paper comes to contrasting conclusions.

As a result, the Council has not applied the latest completions data in determining their future need, despite these completions most accurately reflecting the state of the modern logistics market.

The most recent Authority Monitoring Report (AMR), dated to 2023/24, outlines that Rugby has seen 200.8ha of B2 / B8 and mixed use completions. Extrapolating these completions over the 21-year Plan period would suggest a need of 522ha of industrial / mixed use employment land in Rugby.

522ha is clearly significantly higher than that proposed by the Council, which the Development Needs Topic Paper (DNTP) places at 284ha, of which only 81.5ha is accounted for in the adopted Local Plan. Furthermore, the DNTP also outlines that Coventry has an unmet need for 45ha of employment land which is not proposed to be met in this Local Plan.

Warwickshire Property and Development Group consider that the Council should revisit their evidence base in terms of employment need to ensure that the Plan can continue through examination as the consequence of under-estimating their employment need this severely could be dire.

Rugby's Advantageous Position

Rugby lies in an extremely advantageous position, at the confluence of the most prominent north-south connection in the UK, the M1 motorway, and significant east-west connections, namely the M6 and M45/A45.

As per Paragraph 86a of the Framework, the Council should positively and proactively encourage sustainable economic growth, with regard to the national industrial strategy, namely the report “Invest 2035: The UK’s Modern Industrial Strategy”. This strategy identifies “an enormous untapped potential outside the capital”.

Alternative Site – Land at Barnwell Farm, Thurlaston (Site ID 18)

Warwickshire Property and Development Group’s site at Barnwell Farm, Thurlaston (Site ID 18) is ideally positioned and aligned to continue the growth of the logistics, warehousing and distribution growth in the South West Rugby allocation.

The Site has unconstrained access to the A45 / M45 Thurlaston Interchange junction to its immediate north, providing efficient access for HGVs and other vehicles. There is clear demand for employment development in this location, demonstrated by the pre-letting of units within South West Rugby. The Council should embrace this demand through the allocation of the necessary employment development.

Thurlaston Conservation Area

WPDG understand the Council's concerns in regards to the location of the Site in proximity to the Thurlaston Conservation Area. Any potential impacts on the Conservation Area can be assessed through further assessments on the Site and mitigated through a well-designed landscaping and planting scheme for the Site.

Draycote Meadows SSSI

The Site is sufficiently separated from the Draycote Meadows SSSI by the Whitefields Golf Club. Furthermore, landscaping, planting, and the retention of green buffers surrounding any built development will deliver sufficient protection for on- and off-site habitats.

4. Gypsy and Traveller Sites (Policy S4)

Question 9 – To what extent do you agree with Policy S4?

No response

Question 10 – What are the reasons for your answer to question 9?

No response

5. Climate

Question 11 – To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?

Neither agree nor disagree

Question 12 - What are the reasons for your answer to question 11?

Policy CL1 (Net Zero Buildings)

The target of Net Zero is noted and it seems logical to implement policies which encourage the construction of Net Zero Carbon buildings. Notwithstanding this, the Council needs to ensure the viability of all climate policies are tested in the Whole Plan viability assessment.

In relation to subparagraph A(iii) and (iv) it may not be the most efficient use of land to require that electricity is generated on-site, nor present a viable case for many developers, particularly on sites with larger land takes, such as warehousing, logistics and distribution.

Policy CL3 (Water Supply, Quality and Efficiency)

The Council needs to ensure the viability of all water efficiency policies are tested in the Whole Plan viability assessment, including subparagraph D for employment development.

Policy CL4 (Climate Adaptation)

The Council should clarify how non-residential buildings will be assessed against Policy CL4, particularly criterion (i) in relation to overheating and air conditioning systems. The use of air conditioning may be required by the use cases inside of commercial and industrial development.

6. Economy

Question 13 - To what extent do you agree with the document's economic policies?

Neither agree nor disagree

Question 14 - What are the reasons for your answer to question 13?

Policy E2 (Employment development)

Policy E2 should provide a provision for employment development that is not the infilling or conversion of existing development outside of settlement boundaries. The NPPF (Paragraph 86e) states that planning policies should “be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances”.

The current draft Policy E2 only accounts for conversion or infilling for employment development outside of the settlement boundary. The Council should add provision for supporting employment development where allocated or committed sites have not come forward as planned, to ensure the timely delivery of other development to meet this development gap.

7. Centres

Question 15 - To what extent do you agree with the policies for retail centres?

No response

Question 16 - What are the reasons for your answer to question 15?

No response

8. Environment

Question 17 - To what extent do you agree with the document's environmental policies?

No response

Question 18 - What are the reasons for your answer to question 17?

No response

9. Housing

Question 19 - To what extent do you agree with the document's housing policies?

No response

Question 20 – What are the reasons for your answer to question 19?

No response

10. Wellbeing

Question 21 - To what extent do you agree with the document's wellbeing policies?

No response

Question 22 - What are the reasons for your answer to question 21?

No response

11. Design

Question 23 - To what extent do you agree with the document's design policies?

No response

Question 24 - What are the reasons for your answer to question 23?

No response

12. Infrastructure

Question 25 - To what extent do you agree with the document's infrastructure policies?

Agree

Question 26 – What are the reasons for your answer to question 25?

I4 (Infrastructure and Planning Obligations)

The Council should clarify by which method they would like developers to satisfy criterion D of Policy I4 in respect of demonstrating that developments will provide employment to local residents.

13. Any Other Feedback

Question 27 – If there are any other comments you wish to make regarding the consultation document which you have not already given in your preceding answers, please enter them here.

N/A

14. About You

Question 28 – What is your name?

[REDACTED]

Question 29 – What organisation are you representing?

[REDACTED]

Question 30 – Are you resident of Rugby Borough?

N/A

Question 31 – Email address

[REDACTED]

Question 32 – Contact address

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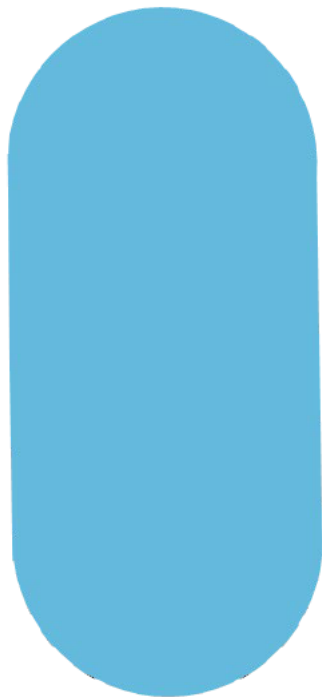
Warwickshire Property and Development Group

Barnwell Farm (Site ID 20)

Rugby Local Plan

Regulation 18 Consultation – Preferred Options

May 2025



1. Introduction

Question 1 – To what extent do you agree with the selection of these objectives?

No response

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No response

2. Strategy for Homes and Residential Allocations (Policies S2 and S6)

Question 3 - To what extent do you agree with the more dispersed overall spatial strategy for new homes?

No response

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?

No response

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 response

Question 6 - The development sites annex lists development requirements for the allocated sites. Are there additional or different requirements we should be seeking? Please specify which site you are referring to.

No response

3. Strategy for Employment Land and Employment Allocations (Policies S3 and S7)

Question 7 – To what extent do you agree with the strategy for employment land?

Disagree

Question 8 - What are the reasons for your answer to question 7? If you disagree, what alternative location(s) would be better and why?

Employment Need Evidence

Whilst Warwickshire Property Development Group do not disagree with the allocations made with the Preferred Options draft Local Plan, the Group raise into question the employment need evidence to ensure that Rugby Borough Council have accounted for **all** of the economic need of Borough and are making the appropriate amount of allocations to account for this need.

The Council's evidence in regards to the amount of employment land required for the Plan period 2045 does not account for the latest completions data to 2023/24 as a Plan period which begins in 2024 should do. Rather, the West Midlands Strategic Employment Sites Study (WMSESS) only accounts to 2021/22. This issue is not resolved by the HEDNA-WMSESS Alignment Paper as this does not provide sufficient detail, and whilst Rugby has experience growth in the sector in recent years, the Alignment Paper comes to contrasting conclusions.

As a result, the Council has not applied the latest completions data in determining their future need, despite these completions most accurately reflecting the state of the modern logistics market.

The most recent Authority Monitoring Report (AMR), dated to 2023/24, outlines that Rugby has seen 200.8ha of B2 / B8 and mixed use completions. Extrapolating these completions over the 21-year Plan period would suggest a need of 522ha of industrial / mixed use employment land in Rugby.

522ha is clearly significantly higher than that proposed by the Council, which the Development Needs Topic Paper (DNTP) places at 284ha, of which only 81.5ha is accounted for in the adopted Local Plan. Furthermore, the DNTP also outlines that Coventry has an unmet need for 45ha of employment land which is not proposed to be met in this Local Plan.

Warwickshire Property and Development Group consider that the Council should revisit their evidence base in terms of employment need to ensure that the Plan can continue through examination as the consequence of under-estimating their employment need this severely could be dire.

Rugby's Advantageous Position

Rugby lies in an extremely advantageous position, at the confluence of the most prominent north-south connection in the UK, the M1 motorway, and significant east-west connections, namely the M6 and M45/A45.

As per Paragraph 86a of the Framework, the Council should positively and proactively encourage sustainable economic growth, with regard to the national industrial strategy, namely the report "Invest 2035: The UK's Modern Industrial Strategy". This strategy identifies "an enormous untapped potential outside the capital".

Alternative Site – Land at Blue Boar Farm, Thurlaston (Site ID 20)

Warwickshire Property and Development Group's site at Blue Boar Farm, Thurlaston (Site ID 20) is ideally positioned and aligned to continue the growth of the logistics, warehousing and distribution growth in the South West Rugby allocation and the confluence of the A45 / A4071.

The Site has unconstrained access to the A4071, with links into Rugby and the A45, which becomes the M45, providing efficient access for HGVs and other vehicles. There is clear demand for employment development in this location, demonstrated by the pre-letting of units within South West Rugby. The Council should embrace this demand through the allocation of the necessary employment development.

The Site benefits from unconstrained access to the A4071 to the west, and can be developed in tandem with Land West of Symmetry Park (Site ID 77) and Land North of A45, Dunchurch (Site ID 58) to deliver a strategic level of employment development on the land between the A4071 and the Cawston Greenway. Upon completion of Symmetry Park, the Site will be immediately adjacent to built development, further improving the sustainability of the location.

The Site could deliver pedestrian and cyclist connections to the Cawston Greenway, providing active travel access to those working within the Site from Rugby, along an entirely traffic free route.

WPDG welcome the conclusion of the Stage 2 Site Assessment Report that the Site is being considered as a potential site option. The Council should continue to consider the Site in light of the above evidence which outlines the need for further employment land over and above the amount proposed.

Green Belt

As per Paragraph 148 of the Framework, when it is necessary to release land for the Green Belt, plans should give priority to grey belt over other locations in the Green Belt. Land at Blue Boar Farm is undoubtedly grey belt, and should be considered first and foremost for employment development over other sites in the Green Belt, as shown below.

For the purposes of this assessment, the committed development of South West Rugby is assumed to form the edge of the town of Rugby to demonstrate that, even post-build out, land at Blue Boar Farm will be classified as grey belt.

Purpose A

As per the Green Belt Planning Practice Guidance (PPG), Sites that have physical features in reasonable proximity that could restrict and contain development and that are partially enclosed by existing development, should only be assessed as making a moderate contribution to Purpose A.

The A4071 provides a physical barrier to further development into the Green Belt, and the development parallel to the A45 / London Road partially encloses the Site, therefore the Site makes no more than a moderate contribution to Purpose A and does not rule out a grey belt classification.

Purpose B

Land at Blue Boar Farm will form part of the gap between Rugby and Coventry (following the build out of South West Rugby), however, this gap constitutes 350m of the 9.35km gap. Development of the Site would reduce this gap by 3.7%, a wholly inconsequential decrease.

Regardless of this gap, as the development of the Site would not result in the loss of visual separation between Rugby and Coventry, at most, the Site can only be assessed as making a moderate contribution to Purpose B and does not rule out a grey belt classification.

Purpose D

Rugby's Conservation Area is approximately 5km to the north-east, and therefore the Site does not form part of the setting of the historic town, furthermore, the substantial development between the Site and Rugby Conservation Area rules out any significant contribution towards Purpose D.

Grey Belt Classification

It is therefore clear that Blue Boar Farm forms grey belt, as per the Framework and PPG.

In accordance with Paragraph 148 of the Framework, the Council should consider the Site as a priority for development over other non-Grey Belt, Green Belt sites.

4. Gypsy and Traveller Sites (Policy S4)

Question 9 – To what extent do you agree with Policy S4?

No response

Question 10 – What are the reasons for your answer to question 9?

No response

5. Climate

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Warwickshire Property and Development Group

Brierleys Farm (Site ID 24)

Rugby Local Plan

Regulation 18 Consultation – Preferred Options

May 2025



1. Introduction

Question 1 – To what extent do you agree with the selection of these objectives?

No response

Question 2 – What are the reasons for your answer to Question 1?

No response

2. Strategy for Homes and Residential Allocations (Policies S2 and S6)

Question 3 - To what extent do you agree with the more dispersed overall spatial strategy for new homes?

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?

Housing Need

Given the stage of preparation of the Rugby Local Plan, it does not qualify for the transitional arrangements set out in the National Planning Policy Framework (NPPF, December 2024) at Paragraph 234. As such, the Local Plan will be considered against the December 2024 version of the NPPF.

The basis of the housing requirement calculated in draft Policy S2 is the Local Housing Need derived from the Standard Method. Firstly, it should be noted that the updated affordability ratios published on 24th March 2025 has increased Rugby's Local Housing Need derived from the Standard Method from 618 dwellings per annum to 625 dwellings per annum, which equates to an increase from 12,978 dwellings over the Plan period (2024-2045) to 13,125 dwellings.

Furthermore, national planning practice guidance is clear that the Local Housing Need derived from the Standard Method may only be relied upon for a period of two years from the time the Local Plan is submitted for Examination¹. It would therefore be prudent for the Council to update the housing requirement calculated utilising the Local Housing Need derived from the Standard Method in the Publication version of the Local Plan and be mindful of any potential changes between Publication and Submission.

¹ Housing and Economic Development Needs Assessment Planning Practice Guidance, Paragraph: 008 Reference ID: 2a-008-20241212 (revision date 12/12/2024)

Notwithstanding this, the NPPF is clear that the Local Housing Need derived from the Standard Method calculates the minimum number of homes required (Paragraph 62), and that the housing requirement set out in a Local Plan may be higher to, for example, reflects growth ambitions linked to economic development or infrastructure investment (Paragraph 69). National planning practice guidance also makes reference to consideration of an increased housing requirement to help deliver the required number of affordable homes².

The Council should ensure it has fully considered whether the Local Plan should make provision for a housing requirement which is greater than the Local Housing Need derived from the Standard Method, in that context.

In addition, the NPPF is clear that 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 in a Local Plan (Paragraph 62). Failure to adequately address unmet needs arising from neighbouring areas would render the Local Plan not positively prepared and therefore unsound in line with NPPF Paragraph 36 a).

Approach to Site Selection

The Preferred Option approach of utilising small and medium size sites is supported by Warwickshire Property and Development Group (WPDG). Small and medium size sites have reduced infrastructure and delivery constraints enabling delivery to commence at faster rate, whilst still contributing towards local infrastructure through the Community Infrastructure Levy (CIL).

The selection of a number of smaller to medium size sites over one larger site ensures the Council's Five Year Housing Land Supply position is robust and defensible throughout the Plan period. Selection of a single site presents a large risk that a landowner or constraint outside of the Council's control could derail the Plan and significantly harm the stable supply of housing through the Plan period.

² Housing and Economic Development Needs Assessment Planning Practice Guidance, Paragraph: 024 Reference ID: 2a-024-20190220 (revision date 20/02/2019)

Furthermore, the 60% of the housing need to be met within the new Local Plan is to come from the strategic housing allocations adopted through the current Local Plan (South West Rugby, Houlton and Eden Park). Further reliance on large, strategic scale sites could place an overreliance on sites with complex planning arrangements. Strategic sites also do not contribute towards the Council's CIL pot (as per the CIL Charging Schedule), meaning that existing residents may not benefit from improved or enhanced infrastructure if all contributions are made through local improvements surrounding strategic sites.

The allocation of small and medium sized sites is directly supported by Paragraph 73 of the National Planning Policy Framework. The Framework recognises the importance of small and medium sized sites in helping meet the housing requirement, and the need to assist SME housebuilders.

Small and medium sized sites within urban areas, such as Brierleys Farm, contribute towards creating sustainable communities and are inherently sustainable due to the promotion of walking and cycling and the existing services and facilities in close proximity. Furthermore, new development within urban areas helps contribute towards the vitality and viability of existing services and facilities by providing increased footfall and local spending, as per Paragraph 90(f) of the Framework.

Policy S6 (Residential allocations)

Brierleys Farm, Brinklow (Site ID 24) has been identified within the Housing and Economic Land Availability Assessment (HELAA; March 2025) as being available, achievable and potentially suitable. Warwickshire Property and Development Group considers that the Site is suitable, feasible and achievable and can be delivered within the Plan period and contribute towards the Council's supply of sustainable sites.

Allocation of Brierleys Farm would provide a small extension to the urban form of Brinklow along the B4428 and would result in a logical extension of the village to provide housing within walking and cycling distance of all of the local services and facilities.

The Site would contribute towards the rural vitality of these services and facilities, providing further residents to contribute towards the local economy, in line with Paragraph 83 of the Framework.

The assessment of the suitability of the Site is outlined within the Housing and Economic Land Availability Assessment, and the Group raise into question a number of the comments, which have been address in turn below.

Green Belt

Warwickshire Property Development Group consider that exceptional circumstances do exist to justify changes to the Green Belt boundaries, a view clearly shared with the Council due to the proposed allocations that are currently within the Green Belt.

In order to release land for development from the Green Belt, the Council must demonstrate exceptional circumstances in line with Paragraph 146 of the Framework. No evidence has been presented to how the Council has selected Green Belt sites over others – this evidence must be prepared and presented.

As per Paragraph 147 of the Framework, the Council must:

- a. Make use of sustainable brownfield sites and underutilised land
- b. Optimise density of development in line with the policies in Chapter 11
- c. Provide land for neighbouring authorities to account for unmet need

By nature of the Council proposing residential development sites within the Green Belt, they accept that the criteria for Paragraph 147 has been undertaken. WPDG agrees, as the Council has proposed development on sustainable brownfield sites, optimised densities on all sites and provided sites within the Stage 2 Site Assessment that are potential site options should an unmet need come forward.

As outlined, Warwickshire Property Development Group consider that the Council must undertake and present for scrutiny the full Green Belt Contribution Study as, per Paragraph 148 of the Framework, grey belt sites should be given priority over other Green Belt locations. The Group consider that Brierleys Farm, Brinklow constitutes grey belt, for the reasons below.

Grey Belt

Annexe 2 of the Framework and the Green Belt chapter of the Planning Practice Guidance are clear that a site should be classified as grey belt if it does not make a strong contribution towards purposes a, b, and d of the Green Belt, as per Paragraph 143 of the Green Belt.

We consider Brierleys Farm is grey belt, as without other evidence produced by the Council, the Green Belt PPG should be utilised to assess the strength of the Site in its contribution towards the Green Belt, and in turn, its classification as grey belt.

Purpose A

The PPG outlines that a Site does not contribute to Purpose A if it is not adjacent to a large built-up area. The PPG is clear that “villages should not be considered large built up areas”. Brinklow is undoubtedly a village and therefore the Site makes **no contribution to Purpose A**.

Purpose B

The PPG outlines that a Site does not contribute to Purpose B if it does not form part of a gap between towns. Again, the PPG is clear that Brinklow would not constitute a town and therefore the Site **makes no contribution to Purpose B**.

Purpose D

The PPG outlines that a Site does not contribute to Purpose D if it does not form part of the setting of a historic town and therefore makes **no contribution to Purpose D**.

It is therefore clear that the Site is undoubtedly grey belt and should be considered as a matter of priority over non-Grey Belt sites for release from the Green Belt in line with Paragraph 148 of the Framework.

Sustainable Attributes

Development on land released from the Green Belt should be focused on those areas which will promote sustainable patterns of development, with particular regard to paragraphs 110 and 115 of the Framework.

Paragraph 110 of the Framework states that patterns of growth should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 115 of the Framework states that sustainable transport modes should be prioritised and safe, suitable access can be achieved for all users and compliant with national guidance, and significant impacts can be mitigated.

It is clear that Brierleys Farm (Site ID 24) is ideally located within Brinklow to maximise access to walking, cycling and public transport modes. Bus stops on Coventry Road lie immediately adjacent to the Site and provide quick and frequent connections to both Coventry and Rugby, via the surrounding villages.

Coventry Road, to which development on Brierleys Farm would access from, already provides footpaths on both sides of the carriageway. Off-site improvements to ensure safe and accessible access for all modes of transport can be delivered.

The claim within the Stage 2 Site Assessment Report that the site has “poor accessibility” is not substantiated by any evidence, particularly as the below Rural Sustainable Study identifies a significant range of services and facilities within close proximity, and the local walking infrastructure is well connected.

Brinklow is identified in the Rural Sustainability Study, which forms part of the evidence base, as the 4th most sustainable settlement in the Borough (outside of Rugby) due its significant level of community, retail, healthcare, leisure, entertainment and education facilities for a rural settlement.

Landscape Sensitivity

The commentary on the Site’s suitability within the HELAA in relation to landscape sensitivity is not supported. The Group does not agree with the Council’s conclusions, and it is unclear why a previous version of the landscape study has been used to assess the Site.

The Landscape Sensitivity Assessment outlines that the Site largely has low to medium/low sensitivity on landscape and visual criteria.

The principle selected Site within Brinklow, Site ID 315 (Land south of Rugby Road), has very similar sensitivities to landscape and visual impacts and requires greater mitigation and design constraints to protect the Brinklow Conservation Area.

Ecology

The HELAA outlines the adjacent High Wood Local Wildlife Site and Ancient Woodland as a potential constraint on development, however, Rugby Borough Council did not see these as large enough constraints to warrant the Site's inclusion within the Ecological Constraints Assessment.

The Site will not adversely impact High Wood due its separation by the B4029. Any development would include buffers from the B4029. The Site would also deliver significant improvements through on-site planting, landscape buffering, new public open space, and ecological enhancements.

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 response

Question 6 - The development sites annex lists development requirements for the allocated sites. Are there additional or different requirements we should be seeking? Please specify which site you are referring to.

No response

3. Strategy for Employment Land and Employment Allocations (Policies S3 and S7)

Question 7 – To what extent do you agree with the strategy for employment land?

No response

Question 8 - What are the reasons for your answer to question 7? If you disagree, what alternative location(s) would be better and why?

No response

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No response

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No response

5. Climate

Question 11 – To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?

Neither agree nor disagree

Question 12 - What are the reasons for your answer to question 11?

Policy CL1 (Net Zero Buildings)

The target of Net Zero is noted and it seems logical to implement policies which encourage the construction of Net Zero Carbon buildings. Notwithstanding this, the definition of “ultra-low energy” and “fossil fuel free” is unclear. Fossil fuel free developments from construction through operation may lead to unviable and unfeasible developments.

Having said that, WPDG object to criteria A iii. and iv. of draft Policy CL1 as it is unlikely to be practical, viable or desirable to incorporate on-site renewable energy within new development.

The delivery of Net Zero buildings and housing should be promoted and supported, however in the context of the national housing crisis and shortfall of homes in Rugby Borough, a requirement for all new buildings to be designed and built to be fossil fuel free is likely to come at the expense of housing delivery and viability on some sites. In order to be sound, any Net Zero policy will need to ensure that it has been adequately tested through viability.

With regards to draft Policy CL1 criterion B ii, an Energy Use Intensity (EUI) target of 35kWh/m²/yr sets a very high fabric standard requirement. Regardless, the EUI metric should not be used within the Local Plan as the Future Homes Standard will not utilise this metric moving forward. In any case, NPPF Paragraph 164 b) is clear that Local Plans should be in line with the requirements of Building Regulations, which themselves are expected to be changed by the forthcoming Future Homes Standard. Thus, criterion B of draft Policy CL1 should be deleted.

Policy CL4 (Climate Adaptation)

WPDG consider that draft Policy CL4 should be deleted.

Criterion A i. been superseded as a result of Part O of the Building Regulations which now requires an assessment of overheating risk, and if necessary, the introduction of mitigation measures.

Criteria A ii. and iii. broadly repeat other draft Policies in the Local Plan including draft Policy EN6, and are therefore unnecessary.

6. Economy

Question 13 - To what extent do you agree with the document's economic policies?

No response

Question 14 - What are the reasons for your answer to question 13?

No response

7. Centres

Question 15 - To what extent do you agree with the policies for retail centres?

No response

Question 16 - What are the reasons for your answer to question 15?

No response

8. Environment

Question 17 - To what extent do you agree with the document's environmental policies?

Disagree

Question 18 - What are the reasons for your answer to question 17?

Policy EN5 (Canopy Cover)

WPDG consider draft Policy EN5 to be onerous and impractical, and recommend it is deleted.

Should the Council seek to retain draft Policy EN5, the Council's 'approved calculator' should be published as part of the evidence base for the Regulation 19 consultation to ensure it can be scrutinised against best practices.

The Council acknowledge in Reasoned Justification Paragraph 5.16 that it may not be practical or desirable to achieve 20% canopy cover and that negotiations may allow a lower level of canopy cover. The ability to negotiate should be included within the Policy wording of draft Policy EN5 if the Policy is to be retained.

9. Housing

Question 19 - To what extent do you agree with the document's housing policies?

Disagree

Question 20 – What are the reasons for your answer to question 19?

Draft Policy H2 (Housing Mix)

Criteria A of draft Policy H2 requires clarity to define the boundary of the Rugby urban area to which the 20% affordable housing requirement applies.

In addition, WPDG consider it is illogical to prescribe an affordable housing tenure mix within the Plan as the need for varying tenures may change throughout the life of the Plan. Draft Policy H2 criterion B should be amended to reflect the approach taken in Policy H1 and ensure that affordable housing tenures reflect the latest local need from the evidence. Furthermore, site-by-site flexibility should be incorporated to ensure that phases within larger schemes can provide an alternative mix, and be able to address specific local needs where they differ.

Draft Policy H7 (Housing Standards)

Criteria D and E of draft Policy H7 seek to prescribe minimum garden / private outdoor space requirements. This is onerous and could contribute to places that are not well-designed as a result. There could also be an impact on development viability, which could reduce the level of affordable housing which is deliverable in the Borough in turn.

10. Wellbeing

Question 21 - To what extent do you agree with the document's wellbeing policies?

Disagree

Question 22 - What are the reasons for your answer to question 21?

Draft Policy W2 (Open Space and Sports Provision)

Criterion C of draft Policy W2 should be broadened to support off-site contributions towards open space and sports provision rather than on-site provision where it would be impractical or not beneficial to deliver a typology on-site. For example, development of a scheme for 50 dwellings would not generate a requirement for a full pitch for any sports provision and the requirement for allotments would be de minimis. Clearly in such cases, contributions towards off-site provision would be preferable.

11. Design

Question 23 - To what extent do you agree with the document's design policies?

No response

Question 24 - What are the reasons for your answer to question 23?

No response

12. Infrastructure

Question 25 - To what extent do you agree with the document's infrastructure policies?

Agree

Question 26 – What are the reasons for your answer to question 25?

Draft Policy I4 (Infrastructure and Planning Obligations)

With regard to criterion C of draft Policy I4, whilst WPDG have wider concerns on the logistics and policing of viability reviews after planning permission has been granted, clarity should be provided on the triggers for viability reviews during construction and once development is complete.

Furthermore, flexibility should be embedded into the requirements of criterion D of draft Policy I4, recognising the limitations of non-strategic residential development to demonstrate potential for ongoing employment and training post-construction, as recognised in Reasoned Justification Paragraph 9.13.

13. Any Other Feedback

Question 27 – If there are any other comments you wish to make regarding the consultation document which you have not already given in your preceding answers, please enter them here.

N/A

14. About You

Question 28 – What is your name?

[REDACTED]

Question 29 – What organisation are you representing?

[REDACTED]

Question 30 – Are you resident of Rugby Borough?

N/A

Question 31 – Email address

[REDACTED]

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Warwickshire Property and Development Group

Homestead Farm (Site ID 90)

Rugby Local Plan

Regulation 18 Consultation – Preferred Options

May 2025



1. Introduction

Question 1 – To what extent do you agree with the selection of these objectives?

No response

Question 2 – What are the reasons for your answer to Question 1?

No response

2. Strategy for Homes and Residential Allocations (Policies S2 and S6)

Question 3 - To what extent do you agree with the more dispersed overall spatial strategy for new homes?

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?

Approach to Site Selection

The Preferred Option approach of utilising small and medium size sites is supported by Warwickshire Property and Development Group (WPDG). Small and medium size sites have reduced infrastructure and delivery constraints enabling delivery to commence at faster rate, whilst still contributing towards local infrastructure through the Community Infrastructure Levy (CIL).

The selection of a number of smaller to medium size sites over one larger site ensures the Council's Five Year Housing Land Supply position is robust and defensible throughout the Plan period. Selection of a single site presents a large risk that a landowner or constraint outside of the Council's control could derail the Plan and significantly harm the stable supply of housing through the Plan period.

Furthermore, the 60% of the housing need to be met within the new Local Plan is to come from the strategic housing allocations adopted through the current Local Plan (South West Rugby, Houlton and Eden Park). Further reliance on large, strategic scale sites could place an overreliance on sites with complex planning arrangements. Strategic sites also do not contribute towards the Council's CIL pot (as per the CIL Charging Schedule), meaning that existing residents may not benefit from improved or enhanced infrastructure if all contributions are made through local improvements surrounding strategic sites.

The allocation of small and medium sized sites is directly supported by Paragraph 73 of the National Planning Policy Framework. The Framework recognises the importance of small and medium sized sites in helping meet the housing requirement, and the need to assist SME housebuilders.

Small and medium sized sites within urban areas, such as Homestead Farm, contribute towards creating sustainable communities and are inherently sustainable due to the promotion of walking and cycling and the existing services and facilities in close proximity. Furthermore, new development within urban areas helps contribute towards the vitality and viability of existing services and facilities by providing increased footfall and local spending, as per Paragraph 90(f) of the Framework.

Policy S6 (Residential allocations)

Warwickshire Property and Development Group strongly support the allocation of Homestead Farm for residential development in the new Local Plan.

The Site is a logical location for housing due to its context. Residential development surrounds the site to the east and west, and the South West Rugby allocation opposite, brings substantial highways improvements to Coventry Road, further lending this location to the development proposed.

The Site is free from any physical or environmental constraints that would prevent development, as acknowledged by the Stage 2 Site Assessment Report. The Site is not designated or recognised for its landscape or heritage significance, and development would continue the urban form and pattern of development seen along Coventry Road, without further extending Dunchurch into the countryside.

Rapid and frequent existing public transport options are available nearby, with bus routes to Rugby, Southam, Leamington Spa, and the surrounding towns and villages available within walking distance. Furthermore, the Homestead Link Road, to be delivered early in the Plan period, will bring further walking, cycling and other transport options to the surrounding area.

The approved General Arrangement Plan for the Link Road shows safe and accessible access to the Site from the new route, and Rugby Borough Council must ensure this is retained.

Dunchurch is ranked as the most sustainable settlement in the Rural Sustainability Study and therefore is the most appropriate location in the Borough (outside of Rugby town) to locate development. This is a result of Dunchurch hosting multiple schools, healthcare and sports facilities, alongside a number of retail, leisure, entertainment, and other services that can meet the daily needs of residents.

Overall, the allocation of Homestead Farm, Dunchurch for residential development aligns and supports the vision and objectives of Rugby's new Local Plan. The Site can deliver approximately 30 dwellings in a highly sustainable location, that aligns with the preferred spatial strategy for Rugby, on a site that is free of known constraints. The Council should carry the allocation forward.

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 response

Question 6 - The development sites annex lists development requirements for the allocated sites. Are there additional or different requirements we should be seeking? Please specify which site you are referring to.

Site ID 90 – Homestead Farm, Coventry Road, Dunchurch

Safe and accessible access can currently be delivered to Coventry Road, from the existing farm access. The approved Homestead Link Road will continue to provide access to the Site, and the Council must ensure this is delivered promptly to ensure delivery of the Site is not delayed.

3. Strategy for Employment Land and Employment Allocations (Policies S3 and S7)

Question 7 – To what extent do you agree with the strategy for employment land?

No response

Question 8 - What are the reasons for your answer to question 7? If you disagree, what alternative location(s) would be better and why?

No response

4. Gypsy and Traveller Sites (Policy S4)

Question 9 – To what extent do you agree with Policy S4?

No response

Question 10 – What are the reasons for your answer to question 9?

No response

5. Climate

Question 11 – To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?

Neither agree nor disagree

Question 12 - What are the reasons for your answer to question 11?

Policy CL1 (Net Zero Buildings)

The target of Net Zero is noted and it seems logical to implement policies which encourage the construction of Net Zero Carbon buildings. Notwithstanding this, the definition of “ultra-low energy” and “fossil fuel free” is unclear. Fossil fuel free developments from construction through operation may lead to unviable and unfeasible developments.

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