

#1

COMPLETE

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Page 1: Introduction

Q1 **Disagree**

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

Q2

What are the reasons for your answer to question 1?

Disagree objectives should also include reference to supporting the delivery of housing to meet all of the District's objectively assessed needs through a dispersed pattern of growth across the District.

Page 2: Strategy for homes and residential allocations (policies S2 and S6)

Q3 **Agree**

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

Q4

What are the reasons for your answer to question 3 and if you disagree with the proposed spatial strategy what alternative should we pursue?

Agree - existing settlements should be able to grow, with new residents supporting the retention of shops, schools and other services. Smaller sites can deliver much needed new homes more quickly, including affordable housing, and will mitigate their impacts on infrastructure through on-site works and off-site financial contributions, where fully justified.

Q5

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?

The principle of new housing in Brinklow, identified as a Main Rural Settlement, is supported (policy S1). This housing should be provided through a number of smaller developments, more commensurate with the character and size of Brinklow. Councils need a range in the scale of development sites allocated to enable steady delivery of housing through the plan period. Smaller sites can provide housing within the first five years, whilst larger sites are being prepared for development to be delivered later in the plan period.

Land west of Lutterworth Road, Brinklow (submitted into the call for sites February 2024) fits this approach and should be included in the site allocations listed in policy S6. This site has already been assessed as suitable for development (it is an allocated site in the Brinklow NDP for 12 affordable houses and up to 7 elderly persons dwellings).

This site can reasonably be considered now as a grey belt site within a sustainable location. There is a developer on board and the site could be delivered in the short-term. This site is suitable for an open market housing development of up to 20 dwellings (including policy compliant affordable housing provision) and should be allocated as such in policy S6.

Q6

Respondent skipped this question

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.

Page 3: Strategy for employment land and employment allocations (policies S3 and S7)

Q7

No Answer

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

Q8

Respondent skipped this question

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

Page 4: Gypsy and Traveller sites (policy S4)

Q9

No Answer

To what extent do you agree with policy S4?

Q10

Respondent skipped this question

What are the reasons for your answer to question 9?

Page 5: Climate

Q11

No Answer

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

Q12

Respondent skipped this question

What are the reasons for your answer to question 11?

Page 6: Economy

Q13

No Answer

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

Q14

Respondent skipped this question

What are the reasons for your answer to question 13?

Page 7: Centres

Q15

No Answer

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

Q16

Respondent skipped this question

What are the reasons for your answer to question 15?

Page 8: Environment

Q17

No Answer

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

Q18

Respondent skipped this question

What are the reasons for your answer to question 17?

Page 9: Housing

Q19

No Answer

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

Q20

Respondent skipped this question

What are the reasons for your answer to question 19?

Page 10: Wellbeing

Q21

No Answer

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

Q22

Respondent skipped this question

What are the reasons for your answer to question 21?

Page 11: Design

Q23

No Answer

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

Q24

Respondent skipped this question

What are the reasons for your answer to question 23?

Page 12: Infrastructure

Q25

No Answer

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

Q26

Respondent skipped this question

What are the reasons for your answer to question 25?

Page 13: Any Other Feedback

Q27

Respondent skipped this question

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:

Page 14: About you

Q28

What is your name?

Liz Nicholson on behalf of

Q29

What organisation are you representing, if applicable?

Linfoot Country Homes Ltd

Q30

No

Are you a resident of Rugby Borough?

Q31

Your contact email

liz@stansgate.co.uk

Q32

Your contact address

Stansgate Planning, 4 The Courtyard, Timothy's Bridge Road, Stratford upon Avon

Q33

Your Postcode

CV37 9NP

Q34

Respondent skipped this question

What is your Gender Identity?

Q35

Respondent skipped this question

Age

Q36

Respondent skipped this question

Ethnicity

Q37

Respondent skipped this question

Do you consider yourself to be disabled?

Q38

Respondent skipped this question

What is your sexual orientation?

Q39

Respondent skipped this question

What is your religion or belief?

#2

COMPLETE

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Page 1: Introduction

Q1 **Disagree**

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

Q2

What are the reasons for your answer to question 1?

See the full regulation 18 response submitted separately on behalf of Tritax Park Rugby West Ltd for our full response to this question.

Whilst the objectives 1-6 in themselves are not disputed, the lack of any clear and unambiguous objective in relation to the need to provide new homes to address the housing crisis is a disappointing omission.

The National Planning Policy Framework (NPPF) confirms that a key government object is to significantly boost the supply of new homes (NPPF paragraph 61), and this is underlined by their December 2024 updates to the NPPF and associated Standard Method for calculating housing need (hereafter the 'SM'). The new SM results in an increased need of over 65,000 homes per annum across England, of which an additional 5,000+ per annum are to be delivered in the West Midlands.

Furthermore, there is a clear lack of affordable housing provision, with the latest HEDNA (November 2022) identifying a need for 407 rented affordable dwellings per annum (Table 8.45) and 88 new affordable homeownership homes. This equates to about 80% of the total SM housing need for the district.

More fundamentally, having a safe place to call home is a fundamental human right which is increasingly out of reach of more and more people. This is in large part due to the lack of new home provisions which is a key factor in the continued rise in house prices compared to earnings. National data indicates over one in ten 30-34-year-olds now live with their parents in England. Having access to one's own safe and secure place to call home leads to better outcomes all round; higher quality of life, better health, better able to positively contribute to the economy. In many ways, home ownership underpins the ability to achieve every other objective.

A 7th objective should therefore be added which unambiguously recognises the underlying importance of providing sufficient safe, high-quality homes. This proposed allocation could provide up to 300 much needed homes in a sustainable location, together with supporting employment uses and extensive parkland to the benefit of the wider Long Lawford community, which will also maintain a separate settlement identity and prevent Long Lawford merging with Rugby.

Page 2: Strategy for homes and residential allocations (policies S2 and S6)

Q3 **Neither Agree nor Disagree**

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

Q4

What are the reasons for your answer to question 3 and if you disagree with the proposed spatial strategy what alternative should we pursue?

See the full regulation 18 response submitted separately on behalf of Tritax Park Rugby West Ltd for our full response to this question.

In broad terms the preferred approach spatial strategy for housing is supported which recognises the need to disperse development to a range of settlements based on their sustainability. The provision of a higher level of housing at Long Lawford is therefore also sensible.

However, Long Lawford should be distinguished in the hierarchy by its excellent access to Rugby urban centre compared to other settlements and in particular the other settlements in the 'main rural settlements (tier 2)' settlement category.

From the edge of Long Lawford to the town centre and railway station is a single bus journey of circa 7 minutes. This compares to a longer journey time from the proposed allocation at Newton Manor Lane, nominally part of Rugby's allocation, of circa 20 minutes, including a 10-15 minute walk to the nearest bus stop. Similar differentials occur in relation to other modes of travel from Newton Manor Lane as well as other proposed allocations on the edge of Rugby.

Due to its proximity and the ease of access to Rugby town centre, Long Lawford is more accessible than allocations on the outer edges of Rugby. The particular unique features of Long Lawford relative to other settlements also categorised as 'tier 2' is not currently recognised. Its unique connection to Rugby provides an opportunity to allocate additional housing to Long Lawford.

It is recognised that Long Lawford (in common with a number of the settlements in the district) is surrounded by Green Belt. The NPPF is clear that to meet housing needs Green Belt should be considered for release, and Rugby's general approach whereby a number of sustainable Green Belt sites are proposed for release for development is welcomed. Paragraph 148 confirms in considering Green Belt review

'...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.'

Land south of Long Lawford is clearly an example where development at its southern edges aligns with the objective of prioritising sustainably located Green Belt release. This is further evidenced by the decision to propose the allocation of land at site 316 (land south of Coventry Road) which requires Green Belt release. Rugby's own evidence base suggests that there is very little, if any, difference between site 316 and site 253 in technical terms, or in the specific site constraints that would need to be considered through the detailed master planning process. Of note however is that site 253 actually performs better than site 316 in Rugby Borough's Landscape Sensitivity Assessment with an overall landscape sensitivity that is considered to be low (site 253) versus a moderate/low sensitivity (site 316).

There also remains considerable uncertainty in relation to other sites, for example site 122 (Old Laurentian Rugby Club) is proposed for allocation of 80 units, but is reliant on the site being vacated by the existing rugby club who remain active on site and require alternative provision before they can vacate. There may be opportunities at site 253 to provide replacement Rugby provision, alongside additional housing, enabling both sites to come forward.

It is also noted that 50dpa are expected from small site windfall, however, no evidence appears to have been presented to back up this allowance. NPPF paragraph 75 requires 'compelling evidence that they [windfall] will provide a reliable source of supply.' No such evidence looking at historic delivery and expected future trends has been set out. Furthermore, windfall allowance should be deducted from the first 3 years of the plan plus any past years at the point of likely adoption (equivalent to at least 150 homes) to avoid double counting with those sites already benefitting from planning permission included in the 'other sites with planning permission' category of supply.

In addition, for the reasons set out in our full response there is a clear rationale for seriously exploring a housing requirement above the SM derived figure. The SM results in a minimum housing need. Evidence suggests there is likely to be reasons to deliver housing levels above the SM. Failure to fully explore opportunities to increase the housing requirement above the SM minimum housing need risks undermining the soundness of the plan, whilst denying those wanting to occupy their own home the chance to do so.

Q5

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?

See the full regulation 18 response submitted separately on behalf of Tritax Park Rugby West Ltd for our full response to this question.

Q6

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.

See the full regulation 18 response submitted separately on behalf of Tritax Park Rugby West Ltd for our full response to this question.

Page 3: Strategy for employment land and employment allocations (policies S3 and S7)

Q7

Disagree

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

Q8

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

See the full regulation 18 response submitted separately on behalf of Tritax Park Rugby West Ltd for our full response to this question.

Our response to this question is 'disagree' because there are additional locations, including the site at Lawford Fields Farm, that would be well suited to accommodate an employment site for small units to meet the identified needs of this market sector. This is discussed further in this section.

Five new employment land allocations are proposed in the draft Plan as set out within draft policy S7: Employment allocations, which include:

- Coton Park east circa 115,000m²;
- South West Rugby employment phase 2 circa 130,000m²;
- North of Ansty Park circa 75,000m²;
- Crowner Fields Farm and Home Farm, Ansty circa 275,000m²; and
- Prologis Park west and Mountpark, Ryton-on-Dunsmore circa 350,000m².

The five proposed new employment allocations are for non-office employment use and provide a total floorspace of 945,000m². In addition, draft policy S3: Strategy for employment land proposes 272,975m² of employment floor space through expansion of existing employment sites and 14,012m² of employment floor space has been accounted for from employment planning permissions on small sites as at 1 April 2024. This forms part of the Borough's need for employment land over the Plan period 2024-2045.

The West Midlands Strategic Employment Sites Study (August 2024) forms part of the evidence base to the draft Plan. In this, it explains that "the market evidence points to a strong need for additional investment sites to be brought forward across the region to support growth" and "Coventry and Rugby continue to be the key markets in the Midlands and continue to see high levels of demand and resulting take-up. The market is positioned firmly within the "golden triangle" with immediate access to the M6/M1 interchange". This therefore highlights the importance of ensuring sufficient employment land provision is accounted for over the Plan period within the Borough.

The Sustainability Appraisal (March 2025) by Aecom (on behalf of Rugby Borough Council), acknowledges that the site is "an option for a residential-led scheme but is also available for employment. A small extension to the Paynes Lane industrial estate could warrant further consideration, but the potential for a medium-sized scheme appears to be limited by land availability (a field excluded from Site 253)".

The Stage 2 Site Selection Report (March 2025) confirms that the site is a potential site option and that the landscape sensitivity is low. Furthermore, the site was considered a potential site option but has not been included within the draft Local Plan. Some of the proposed employment allocations, such as Crowner Fields Farm (site 95) and North of Ansty Park (site 14), are also within the Green Belt and in the Stage 2 Site Selection Report (March 2025) it considers the former to be of 'medium/low' landscape sensitivity and the latter to be of 'low' landscape sensitivity. Both sites are considered to "potentially provide a strong contribution to at least one green belt purpose". The Council is therefore proposing to make changes to the Green Belt to accommodate employment site allocations and the site at Lawford Fields Farm also falls within the same bracket as the two sites mentioned, scoring higher in terms of landscape sensitivity than the Crowner Fields Farm site.

The questionnaire for section 3 explains that the five employment land allocation sites have been selected because:

- They are expansions to or are well-related to existing successful employment areas and major road links;
- They are close to the main centres of population in Coventry and Rugby, reducing commuting distances; and
- They offer opportunities for diversification of the economy, a range of different scales of building and the delivery of other benefits including country parks/public open space and training facilities.

The site at Lawford Fields Farm is immediately adjacent to an existing strategic employment site (Paynes Lane), as covered under adopted policy ED1 and draft policy E1. It is therefore an ideal location for expansion to enable additional employment development. Approximately 3ha of the site at Lawford Fields Farm is proposed as land for employment use, as shown in the accompanying proposed Draft Local Plan Key Diagram below (Figure 1). It is bounded to the north by the A428 and to the south by the A4071, both major road links. This therefore accords with the first reason as set out above.

The site is located adjacent to the settlement boundaries of Long Lawford and Rugby town, the former being a growing settlement with an additional residential allocation proposed in the draft Plan for circa 400 dwellings (draft policy S6) and the latter being the largest settlement area in the Borough. The site is therefore within very close proximity of main centres of population and would therefore accord with the second reason.

Questionnaire on Rugby's Preferred Options Consultation Document

therefore accord with the second reason.

The circa 3ha portion of the site proposed as land for employment use has the benefit of forming part of a wider site being put forwards for both residential and employment use, as outlined in this representation. It is therefore proposed that the wider site would provide large amounts of open space along the southern and western boundaries, as well as community parkland and potential sports uses or community facilities. The area of the site proposed for employment use is also flexible in terms of what the precise use would comprise of and the building scales. This therefore accords with the third reason.

It is therefore evident that the north-eastern part of the site at Lawford Fields Farm is an ideal site for employment use development and would form an extension to the Paynes Lane existing strategic employment site.

Page 4: Gypsy and Traveller sites (policy S4)

Q9

No Answer

To what extent do you agree with policy S4?

Q10

Respondent skipped this question

What are the reasons for your answer to question 9?

Page 5: Climate

Q11

No Answer

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

Q12

Respondent skipped this question

What are the reasons for your answer to question 11?

Page 6: Economy

Q13

No Answer

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

Q14

Respondent skipped this question

What are the reasons for your answer to question 13?

Page 7: Centres

Q15

No Answer

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

Q16

Respondent skipped this question

What are the reasons for your answer to question 15?

Page 8: Environment

Q17

No Answer

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

Q18

Respondent skipped this question

What are the reasons for your answer to question 17?

Page 9: Housing

Q19

No Answer

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

Q20

Respondent skipped this question

What are the reasons for your answer to question 19?

Page 10: Wellbeing

Q21

No Answer

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

Q22

Respondent skipped this question

What are the reasons for your answer to question 21?

Page 11: Design

Q23

No Answer

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

Q24

Respondent skipped this question

What are the reasons for your answer to question 23?

Page 12: Infrastructure

Q25

No Answer

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

Q32

Your contact address

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Q33

Your Postcode

[REDACTED]

Q34

prefer not to say

What is your Gender Identity?

Q35

[REDACTED]

Age

Q36

Prefer not to say

Ethnicity

Q37

[REDACTED]

Do you consider yourself to be disabled?

Q38

Prefer not to say

What is your sexual orientation?

Q39

Prefer not to say

What is your religion or belief?
