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Date: 19th May 2025

Planning Policy
Rugby Borough Council

SUBMITTED VIA E-MAIL

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Dear Sir or Madam,

Rugby Borough Local Plan Preferred Options Consultation- March 2025
Proposed development at Old Lodge Farm, Binley Woods

1. Thank you for the opportunity to comment on your Rugby Borough Local Plan- Preferred Options Stage. We write to make comments on behalf of our client Trustees of the GJ Walpole-Brown Discretionary Settlement and The Reed Family 2021 Discretionary Trust who own land at Old Lodge Farm, Binley Woods (site ref. 45).
2. Our client's land at Binley Woods can positively contribute and merits allocation in the Local Plan. It is sustainably located being adjacent to Coventry and on a principal transport route with frequent bus services. The proposed development on Rugby Road can also provide services and facilities to benefit the existing population to the south of the proposed development site.
3. This submission is made in two parts. Firstly, our response on the Local Plan Preferred Options at a high level, addressing strategic matters. This is set out in paragraphs 4-13. Comment directed specifically to the land at Binley Woods explaining why it is considered suitable for allocation (paras. 14-23).

Housing numbers

4. We welcome the Council's acknowledgement of the housing need identified through the standard method set out in the NPPF 2024 and the Plan's intention to meet this need. However, we are concerned that the strategy does not allocate sufficient land to deliver these homes, notwithstanding the buffer applied on top of NPPF figures.
5. The strategy for homes (S2) relies on a notable contribution from windfall sites to meet the objectively assessed need (50dph). However, the Council's latest housing supply assessment shows this number of homes is not currently being delivered. In 2023-24 monitoring year delivered only 39 homes. Although the average for the period 2011-2024 is 49.4 this still falls short of the requirement in the proposed plan.
6. We do not consider it sound for the Local Plan to rely upon delivery of windfalls at a higher rate than currently and historically achieved in the borough. This is particularly so as the areas in

which windfall development would be supported are reduced meaning, logically, the pool of potential development sites is reduced.

7. Dunchurch is no longer listed as a location in which windfall development is supported reducing potential windfall sites. There is no obvious change that creates opportunity for residential development where it is not currently allowed. Logically, with land in finite supply, opportunities in existing villages will diminish as suitable sites have been developed under the longstanding policy. Those sites that have not yet come forward cannot be relied upon to now come forward.
8. Noting the vulnerability of the windfall supply we believe additional land be allocated to meet the identified housing need in order that there is a clear and demonstrable supply of sites in the Local Plan. Any allocations should be expressed as minimum figures to give allowance for additional supply where appropriate.

Spatial strategy

9. We welcome the Councils' preferred approach of dispersed development with proportionate development spread across the borough's rural settlements, complimenting larger growth at the principal settlement.
10. The NPPF is clear in its requirement for development plans, in common with planning at all levels, to support rural areas. Paragraph 83 states:

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby"
11. We believe allocations of housing sites in rural areas to be vital to satisfying the NPPF requirement to sustain rural communities. We welcome their inclusion, including the proposed allocation at West Farm, Brinklow. Further, we would support the allocation of further suitable sites as discussed later in this response. Brinklow is a very good example of a sustainable rural village the NPPF seeks to protect. It has a range of local facilities that it is essential to sustain for the good of the settlement and nearby rural population that look to the village for services.
12. Noting the sustainability appraisal that has informed the Preferred Options document we concur that the proposed dispersal of development around smaller settlements represents the most suitable strategy.
13. An alternative that focused development at Rugby on fewer larger sites would not be sustainable as it would not sustain rural communities as required by paragraph 83 of the NPPF. Furthermore, the scale of development envisaged across the plan area would mean if located at Rugby alone it is unlikely that development would be sustainable. Although the town benefits from a reasonable range of services and facilities, a development to meet the borough's development needs would be so large as to place most households remote from the

main services and facilities of the town. Thus, it would not benefit from sustainability of a town address.

Old Lodge Farm, Rugby Road, Binley Woods

14. The site at Old Lodge Farm is sustainably located being close to Coventry and on a frequent bus route rating highly for public transport accessibility. The position also allows opportunities for active travel encouraging sustainable travel patterns.
15. In considering a proposed development of the site it is also relevant that a scheme of the scale envisioned for the land would include new services and facilities (community spaces, etc). These should benefit existing homes on Rugby Road that have limited facilities in their immediate vicinity.
16. We note the Council's decision not to pursue our client's land at Old Lodge Farm as a preferred option for allocation. The reasoning is noted; however we believe the decision merits review. We consider the issues identified by the Council below.

Mineral safeguarding

17. The land has been discounted from consideration owing to its position in a mineral safeguarding area. However, we disagree this designation should preclude development.
18. The safeguarded areas in Warwickshire are large and cover a substantial portion of Rugby Borough including most of the area proximate to Coventry. However, in this case much of the land proposed for development is unlikely to be suitable for extraction owing to nearby dwellings, watercourses, and other features which require stand-offs from extraction activities. This substantially reduces the quarry-able area that might be 'lost' to a residential development. Notwithstanding, the presence of minerals should not preclude development of a site. The plan period is long and there is scope for minerals to be extracted and then land developed. Indeed, such an approach could provide a sustainable approach to development reducing need for transport of minerals and materials to development sites.

Green Belt

19. In common with most proposed allocations the site is in the Green Belt. This is a consequence of its proximity to Coventry, a key asset in its sustainability as a location. In this case the Council has undertaken a thorough review confirming there to be an exceptional need for revision to Green Belt boundaries to meet development needs, therefore the Green Belt designation should not be a fundamental barrier to development.
20. The land is visually well contained with mature woodland to the east and west, and houses fronting Rugby Road to the south. These substantial and defensible barriers provide a contained site reducing risk of sprawl; there is ample opportunity to provide planting to the north to also contain the site as sought by NPPF para. 149. The existing belt of homes alongside Rugby Road prevents any great sense of openness from the site's main public aspect reducing likelihood of an allocation being detrimental to the wider Green Belt and its purposes.

Access

21. The Council also cite the absence of existing access as a reason the site has not been preferred as an allocation. Noting the scale of development envisaged from the area we do not believe the site should have been dismissed from consideration without proper review of possible solutions.
22. The land benefits from existing access to Rugby Road to the south. Whilst it is acknowledged the existing single-track route is not suitable for the scale of development envisioned, we believe there to be potential for improvement. Access to the land is also possible from the B4428 (Coventry Road) as all land between the B4428 and A428 is in the direct control of our client.
23. New access will need to be provided for any strategic development site and we expect this to be provided here. We would be pleased to discuss this further, including potential for wider improvements incorporating land in our client's ownership to accommodate access.

Conclusion

24. We welcome proposals to encourage growth in Rugby Borough and the proactive stance the Councils are adopting in the allocation of new development sites. We also support the proposed spatial strategy of dispersal of development to settlements around the borough, we believe this essential to sustain rural populations, facilities, and communities. Furthermore, it is necessary to satisfy the NPPF requirement to support prosperous rural areas (paragraph 83) to ensure a sound plan.
25. We wish to highlight the assets of our client's other submitted site at Old Lodge Farm, Binley Woods. We respectfully disagree with the Council's assessment that the land should not be a preferred option for development owing to access and mineral safeguarding constraints. We believe both matters can be overcome and, noting the site's excellent location in sustainability terms, merit further consideration. We would be pleased to contribute to this.
26. We request that we are added to your consultation database in order that we can participate in further consultations and following examination of the Local Plan.