

19th May 2025

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

By email only: localplan@rugby.gov.uk

Dear Sir/Madam,

Re: Rugby Borough Local Plan Preferred Options Consultation

Introduction

These representations to the Rugby Borough Local Plan Preferred Options ('PO') consultation have been prepared by Rosconn Group (RG). They are accompanied by a Vision Document, Concept Plan and a number of technical reports (Transport, Ecology and Landscape & Green Belt).

Rosconn are a land promotion company who act for the landowners of land off Coventry Road, Wolvey ('The Site'), identified as **Site ID: 96** in Council documentation. RG have an agreement with the landowners to promote the Site for residential development by seeking its release from the Green Belt within the Rugby Borough Local Plan Review.

These representations are therefore primarily focused on the strategic matters relevant to meeting the future housing needs of the Borough, as well as those matters specific to the Site, which has been identified as draft allocation Site Ref.96 within the PO under Policy S6 and the associated Proposals Map.

Strategy (Policies S1, S2, S5 and S6)

As detailed within **Policy S1**, the location of new development required within the Borough during the Plan period up to 2045 is informed by the settlement hierarchy, the scale of which is commensurate with the services and facilities of the settlement. Rugby town, being the principal urban area within the Borough, is to be the main focus for new homes and employment, whilst the 8 Main Rural Settlements (MRS) are identified as the 2nd tier of the hierarchy, and which are also expected to accommodate growth.

Policy S1 effectively duplicates Policy GP2 of the current adopted Local Plan and was found sound by an Inspector at Examination. As such, RG **supports** this approach.



Policy S2 then details the Strategy for Homes, detailing the overall housing need during the Plan period and then setting out the different components of supply required to achieve delivery of this requirement.

In terms of the housing requirement, NPPF 62 states that to determine the minimum number of homes needed, the standard method (SM) should be used. As detailed at paragraph 1.4, the PO has calculated the requirement using the SM figure of 618 dwellings per annum which, over a 21-year Plan period, gives a minimum requirement of 12,978 dwellings. It should however be noted that the SM was updated in March 2025 to reflect new affordability ratios, increasing Rugby Borough's SM marginally to 625 dpa.

Notwithstanding, a further observation from the table at Policy S2 is that of the overall housing requirement of 12,978 dwellings, 10,796 is already committed through existing allocations in the adopted Local Plan, other sites with permission and an allowance for future windfalls. As such, the minimum residual requirement to be identified over and above the existing commitments is for a further 2,182 dwellings.

Having reviewed the existing commitments, as detailed within the accompanying 'Topic Paper: Development Needs', it is apparent that at least 84% is on sites within or adjacent to the urban area of Rugby town (approximately 9,120 dwellings), with the remainder primarily within some of the second tier MRS. It is therefore clear that the general spatial strategy of the adopted Local Plan in focusing the majority of housing growth within the principal urban area of Rugby town, as informed by the settlement hierarchy, will by definition follow through into the emerging Local Plan regardless of where the residual housing requirement is located.

In order to address the minimum residual housing requirement, the table at Policy S2 identifies new allocations under Policy S6 totalling 3,338 dwellings, which is in excess of the figure of 2,182. Paragraph 1.6 of the PO confirms that the new allocations amount to approximately 9% more than required by the minimum residual figure in order to provide a buffer to increase the likelihood of being able to demonstrate a five-year housing land supply throughout the Plan period, albeit as noted above, when applying the latest SM, this buffer would reduce to just under 8%. Whilst it is expected that the SM will change intermittently during Plan-making, the addition of a buffer, which is standard practice, can assist in helping mitigate these variations and again, RG **support** this approach.

When assessing the new allocations identified within Policy S6, 1,210 dwellings are to be directed to the Rugby urban area, whilst the majority of the remaining allocations (2,103) are sites within the 2nd tier MRS. As such, the PO would result in a distribution whereby approximately 73% of overall growth would continue to be directed to Rugby urban area, and approximately 17% accommodated within the 2nd tier MRS. This appears to be similar to the 'at least 75%' of new homes being focused on Rugby town, as quoted at paragraph 1.17 of the PO.

Historically, Rugby Borough has experienced issues in being able to maintain a deliverable supply of housing land, as required by national policy. This is noted in the Inspector's Report (IR) of 2019 which considered the Development Strategy within the current Local Plan. At paragraphs 61-62, the Inspector notes that the approach of allocating sites away from the Rugby urban edge in the MRS was justified on the basis of broadening the housing supply, whilst also assisting in sustaining rural communities and their services. This was within the context of the fact that at that time, there had been an overreliance on Rugby town where up to 90% of housing development had been focused – since 2011, this distribution so heavily focused on the town meant that it had not been able to deliver housing at the rate of the Core Strategy (540 dpa), or maintain a deliverable 5 year housing land supply. The merits of



allocating sites in the MRS is further noted at paragraph 164 of the IR, recognising that such an approach would ensure the necessary capacity within the housing land supply, diversifying the portfolio to supplement the primary source around Rugby, and offering a range of smaller sites for SME builders which in turn would help boost the rate of delivery to meet the step up in the housing requirement at the point of adoption. Such factors remain relevant today.

Whilst there is limited explanation within the PO itself about the development strategy that has been adopted, the accompanying evidence assists in clarifying this. The 'Spatial strategy and site selection methodology summary' provides a helpful outline of the 3 stages that have been adopted in identifying the development of reasonable alternative spatial strategy options, identifying the Sustainability Appraisal (SA) as having a key role in analysing strategic considerations in order to generate options for growth scenarios.

Section 5.2 of the SA considers strategic factors that have a bearing on the definition of the reasonable growth scenarios and specifically the broad spatial strategy to determine which locations are more or less suited to growth. Paragraph 5.2.44 onwards outlines some of the key challenges within the Borough that have been considered including the following:

- The settlement hierarchy being a key starting point, comprising Rugby and the 8 villages in the second tier.
- Whilst Rugby town must clearly be a focus for growth, there is a need to account for a very high level of committed growth, particularly from a delivery perspective.
- The committed SUEs at Rugby town have faced delivery challenges, as well as viability limiting the provision of affordable housing in these locations (e.g. Houlton is delivering zero affordable housing).
- The need to carefully consider the location and type of new sites in order to avoid previous, ongoing and further delivery issues.

In considering all options, the SA finds there to be a clear case to explore the proportionate growth of the MRS, particularly where larger sites are well placed to deliver a mix of uses and/or upgraded infrastructure alongside new homes. Paragraph 5.2.58 summarises the key benefits of such an approach which includes an element of dispersal from the main urban area, whilst still distributing growth broadly in line with the settlement hierarchy. These benefits include:

- Maximising the potential to deliver the housing requirement.
- Supporting village vitality in terms of housing needs, infrastructure, services, facilities and retail.
- Supporting SME builders.
- Improving the delivery of Affordable Housing
- Minimising pressure on Rugby.
- Expediting plan-making.

The SA then turns to consider the issue of Infrastructure, and in particular the importance of directing growth to areas that either have access to existing infrastructure or are otherwise able to deliver new or enhanced infrastructure, to support such growth. Paragraph 5.2.59 onwards considers 2 key infrastructure issues in respect of schools and transport. In terms of primary school capacity, focus has been on those villages that have existing headroom or are otherwise able to expand (i.e. Brinklow, Long Lawford and Wolvey), whilst initial work on transport has identified areas less congested and with scope to achieve modal shift towards public and active transport.



Again, as detailed within the 'Spatial strategy and site selection methodology summary', the SA has sought to assess a number of growth options in order to identify a Preferred Option, a process informed by a 'bottom up' analysis of suitable and available sites (HELAA Stages 1 and 2) and the 'top down' strategic considerations, as discussed above. Section 5.4 of the SA turns to consider matters including potential housing sites within individual settlements, with the focus on Rugby and the 8 MRS.

In light of RG's interests, our focus in terms of growth options focuses on growth at Wolvey in particular. Paragraph 5.4.77 concludes that the emerging preferred approach involves support for large-scale growth around the village across 3 sites, including the land being promoted by RG off Coventry Road (Site 96). This approach has been supported on the basis of the site options being subject to limited constraints and the ability to support growth and deliver targeted benefits beyond new housing for both existing and new residents, including scope to expand the primary school, a new neighbourhood hub and other infrastructure improvements.

The proposals at Wolvey form part of Scenario 1, one of 5 Housing Growth Scenarios appraised by the SA. This scenario was found to perform well against the 13 SA Topic Areas and has clearly helped inform the Council's decision to favour this scenario over others on sustainability and wider strategic considerations relevant to the Borough as a whole.

In summary, RG consider that the PO has adopted a sound and justified approach in respect of the Strategy for Homes detailed within **Policy S2**, supported by the evidence base, which we fully **support**.

In terms of **Policies S5** and **S6**, RG fully **support** the release from the Green Belt and the proposed allocation of Site Ref. 96: Land at Coventry Road, Wolvey for 500 dwellings. Again, with reference to the evidence base, it is clear that the Council have undertaken a detailed assessment of the suitability and sustainability of individual sites through the HELAA (Stages 1 and 2).

As outlined within the Stage 2 HELAA, further expanded on within the 'Spatial strategy and site selection methodology summary', a detailed technical analysis of site constraints and opportunities has enabled the narrowing of the list of sites to reasonable options for inclusion within the SA. This has included site visits, transport analysis, school place planning advice, landscape sensitivity assessment, assessment of ecological constraints, heritage assessment and the identification of opportunities for other public benefits that development of a site could deliver.

It is however notable that an important piece of evidence base has not yet been completed in respect of the Green Belt. The Stage 2 HELAA notes that whilst a draft Green Belt study was commissioned, owing to recent changes by the new Government, additional work is required to finalise this. Notwithstanding, planning judgement has been applied to site selection at this stage, albeit this preliminary assessment remains subject to the findings of the Green Belt study in due course.

It is essential that final decisions regarding the Green Belt are supported by an appropriate evidence base, and that such an approach accords with Government guidance as set out within the NPPF. It is however notable that following the change in Government in 2024, the subsequent changes to the NPPF reflect the ambition to deliver 1.5 million homes during its first parliamentary term, have resulted in important changes to Green Belt policy.

Whilst paragraph 145 of the NPPF continues to require that alterations to Green Belt boundaries should only be altered in exceptional circumstances, in recognition of the housing crisis and Government ambitions to address this, paragraph 146 has been introduced to clarify



that exceptional circumstances now include instances where an authority cannot meet its identified housing needs through other means. Where such circumstances exist, review of Green Belt boundaries should accord with policies within the NPPF and such alternations should meet these needs in full, unless there is clear evidence that doing so would fundamentally undermine the purposes of the remaining Green Belt across the area of the plan.

Clearly it is for the Council to undertake this assessment and provide the required evidence to determine whether its development needs cannot be met in some other way, and if this is the case, whether in meeting its needs in full it would fundamentally undermine the wider Green Belt within the Borough. However, it is notable that exceptional circumstances existed when preparing the current Local Plan, even when set against a previously more stringent policy framework than which exists today. Furthermore, the guidance within the NPPF (and the associated PPG on Green Belt), introduces the concept of 'Grey Belt' in order to aid the identification of lower performing Green Belt that is more sequentially preferable when determining Green Belt release.

Whilst RG reserve the right to comment further on the case for Green Belt release following the publication of the Green Belt Study, we have undertaken our own assessment of the Green Belt in respect of our Site at Wolvey to help support our case for its release from the Green Belt and its allocation for residential development. This is expanded on further later in these representations and the accompanying documents.

Environment (Policies EN5 and ENV6)

Policy EN5 seeks to secure an increase in tree canopy cover within the Borough by requiring all major developments to increase post-development tree cover by at least 20% of the site area, excluding Rugby town centre. Paragraph 5.17 notes that increasing canopy cover has benefits such as urban cooling, biodiversity, climate change mitigation and the attractiveness of an area.

The evidence to support this policy is referred to at paragraphs 5.18-19. The first of these is an estimate by Friends of the Earth in 2023 based on the National Forest inventory data, that just 4.5 % of Rugby Borough is woodland, placing the Borough in the bottom 20% of English Local Authorities. The second refers to a report (undated but appears to be from 2017) which considers the canopy cover of England's Towns and Cities, and the proceedings of a Research Conference held in Birmingham in 2011, which purport to provide support for a recommended minimum tree canopy cover target of 20%, in the context of Rugby town being 13.2% (as at 2016).

RG have significant concerns regarding this proposed policy and have not come across anything similar in other Local Plans. Having reviewed the evidence referred to in the supporting text, it is firstly apparent that there appears to be some inconsistency in respect of the current situation, potentially due to the age of the data relied on. The 'State of Habitats: Rugby Borough', included as part of the Council's Evidence Base, estimates that the tree canopy cover within Rugby Borough is 12%, much higher than the 4.5% quoted in the PO. Furthermore, the 2017 report relates to research solely in relation to UK Towns and Cities, not wider Local Authority areas, and the targets specified relate to achieving improvements within these urban environments, rather than across a wider administrative area such as a predominantly rural area like Rugby Borough.

In addition, there does not appear to have been any consideration given to the implications of requiring a fifth of a site area allocated for development to be covered with trees. What are the likely implications of the development objectives being delivered in the quantum envisaged



and are there any financial implications which might make development unviable or otherwise undeliverable? This does not appear to have been considered.

In summary, whilst RG recognise the benefits of increased tree canopy cover generally, we do not consider Policy ENV5, as currently drafted, to be sound or justified by a credible evidence base. RG therefore **objects** to **Policy ENV5** accordingly.

Housing (Policy H2)

Whilst Policy H2 supports the provision of Affordable Housing as a percentage of new homes on developments of 10 or more homes, the levels of affordable housing provision do not reflect the guidance within the NPPF where such sites are located on land to be released from the Green Belt.

NPPF67 states that a specific affordable housing requirement should be on land to be released from the Green Belt that is higher level than that which would otherwise apply to land that is not within the Green Belt. It continues that this level should be at least 50%, unless this would make the development unviable.

NPPF156 also states that where major development is proposed on land released from the Green Belt through plan preparation or review, one of the contributions required (referred to as the 'Golden Rules') is for affordable housing which reflects the guidance at NPPF67.

Policy H2 does not therefore reflect the most recent guidance in respect of Green Belt and the Golden Rules and RG therefore **object** to **Policy H2** as currently drafted.

Development Site Allocations (Site Ref.96 – Land at Coventry Road, Wolvey)

In respect of the residential allocations at Wolvey, RG are promoting and **support** the draft allocation of **Site ID: 96 – Land at Coventry Road, Wolvey** for circa 500 dwellings. A **Vision Document** and initial **Concept Plan** have been prepared and accompany these representations, but a review of the 'Development Requirements' set out within the PO and the key findings of our site-specific evidence base for the area concerned is provided as follows.

Development Requirements:

- *Compliance with the Wolvey village expansion design code* – we appreciate that at this stage, a design code to help inform all proposed development at Wolvey has yet to be advanced. RG however confirm our willingness to work with RBC, the local community and other key stakeholders in preparing a Village Design Code that will establish a set of high level design principles to help maintain and reinforce the local identity and distinctiveness of the village, whilst also aiding the proposed development's integration with the existing village;
- *Access from the B4109 and from Coventry Road (B4065). Pedestrian and cycle connection to Fern Hill Way* – our initial Transport Appraisal has included the consideration and design of appropriate new vehicular access points to serve the proposed development from both Coventry Road and Bulkington Road. As shown on the Concept Plan, a new 4-arm roundabout is proposed on the Coventry Road to serve new development to the eastern and western parcels, which would also aid the calming of traffic approaching the village from the south, alongside new gateway features. A simple priority junction is proposed on Bulkington Road which can be spaced in order to avoid conflict with existing junctions and any new junction required to serve the separate proposed allocation north of Bulkington Road (Site ID: 309). It is also proposed to extend the 30mph limit to the outer extents of the Site on both roads to reflect the change in environment for drivers and



increase the safety of pedestrians and cyclists. Both access proposals can be delivered within land controlled by RG or otherwise within the public highway. Both new access points will also provide new pedestrian and cycle connectivity to the existing local highway network, whilst new routes will be incorporated including via Fern Hill Way so that permeability between the Site and wider community is maximized.

- *Land for primary school provision and opportunity to expand existing recreation ground* – as shown on the Concept Plan, space is shown adjacent to the existing school and recreation ground to enable their expansion. Discussions are on-going to determine exactly what is required, but the principle of expansion is accepted and is deliverable as part of the wider development.
- *Provision, fronting Coventry Road or Bulkington Road, of a small-format supermarket with between 250 and 500 square metres of floorspace, together with a preschool/nursery and smaller units for Class E or community use* – as shown on the Concept Plan, provision is made for a Local Centre that could include a range of new retail, commercial and community uses to help complement the provision within the existing village centre. The proposals can be refined in due course once clarity is provided regarding what is needed within the Hub, but could potentially include the relocation and enlargement of the existing GP Surgery for instance.
- *The existing Public Right of Way (PROW) must be maintained, and the design of the development must ensure it is pleasant to use and well overlooked. The PROW should be maintained on its existing line, with diversions only occurring where this is not practicable. The PROW should be enhanced to be accessible to as many people as possible, including those who are disabled or less mobile* – the existing PROW passing north/south through the eastern parcel is shown on the Concept Plan to be retained and enhanced along its current alignment. There is also scope to create additional pedestrian/cycle routes throughout the development to help encourage sustainable travel choices to access existing services and facilities within the village and those to be provided within the Site.
- *Contributions to improved public transport provision* – RG are already exploring opportunities to improve the existing public transport provision serving the village and have already held positive discussions with Arriva and WCC about the ability to upgrade the 74 Service and/or re-routing the proposed 72 service between Rugby and Nuneaton that is being provided as part of the Fraser Group Campus development. This will include financial contributions to deliver high quality and frequent access to public transport bus services, primarily to the nearby service centres of Bedworth, Nuneaton and Coventry for employment, retail and leisure purposes. There is also the potential to provide a 'Mobility Hub' as part of the Local Centre within the Site, as shown on the Concept Plan. This could provide a range of facilities to further encourage more sustainable transport choices, including a car club, electric bike hire, car park with EV charging facilities, secure cycle parking, parcel delivery/collection hub and real-time mobility information through smart screens and QR code downloads.

In addition to the above, RG have also reviewed the Stage 2 HELAA with a view to addressing any concerns about the suitability, sustainability and deliverability of Site 96. Each of the relevant Topic Areas within the 'Stage 2 Site Options Assessment' (March 2025) are considered in turn below.

Transport

It is firstly noted that National Highways (NH) were consulted regarding this Site, along with the other sites in Wolvey to see whether they had any concerns in respect of the Strategic Road Network. NH did not provide any comments so it is assumed at this stage that there is



unlikely to be any concerns in this respect, albeit the cumulative effects of the PO will be assessed in further detail as part of the Strategic Transport Assessment (STA) which is expected to be published shortly.

In terms of the capacity of the local highway network, an assessment has been undertaken by RBC's consultant to determine congestion levels at peak and non-peak times on roads surrounding the Site. This indicated a congestion rating of category 4, with 1 being the most congested and 6 being less congested. Category 4 suggests that existing conditions may well be capable of accommodating growth from the proposed development without significant impact, but this will no doubt be determined once the STA has been completed.

Our initial **Transport Appraisal** has also investigated the issue of public transport accessibility, as it is acknowledged that the existing service provision would benefit from improvement. As highlighted above, we have held initial discussions with both Arriva and WCC and there is scope to significantly enhance existing services to provide a high quality, frequent bus service for the village to key service centres nearby such as Bedworth, Nuneaton and Coventry. In addition, alongside the potential to provide a 'Mobility Hub' within the Site, improvements to the existing bus stops within the village nearest to the Site can also be delivered to include new shelters and real-time information boards.

Ecology

RBC have undertaken an initial assessment, informed by an initial screening process to identify those sites in proximity to areas likely to be ecologically sensitive. This screening process scoped out the Site on this basis and was not therefore further assessed for ecological constraints

Notwithstanding, RG have commissioned an Initial **Ecological Assessment** by a qualified Ecologist which has involved a desk-top review of ecological data from Warwickshire Biological Records Centre, and a subsequent site visit. This assessment found the Site, in view of it principally being in active agricultural cultivation, to be of little ecological value and no habitats of importance to protected species were identified, albeit nocturnal bat activity surveys during June-September are recommended in view of recorded bat species in the locality that suggests the land may be used for foraging. In addition, a follow-up Phase 1 Habitat Survey is also recommended during the summer, which will be undertaken in due course.

In summary, whilst the Site is of limited ecological importance, other than field boundary trees and hedges which will be retained and enhanced in general, there is significant scope to secure biodiversity net gain through the creation of high-quality habitats throughout the Site.

Landscape

RBC have undertaken a 'Landscape Sensitivity Assessment of Strategic Site Options' (March 2025) which includes the land at Coventry Road, Wolvey. In Landscape Value terms, the assessment concludes that the Site is not considered to be of high historic, cultural or landscape value, whilst in Visual Value terms, the PROW that traverses the Site is recognised as providing recreational value for local residents, with views of settlements, surrounding pastoral and arable landscapes which contribute to the scenic experience. Whilst views into the Site from the B4109 and B4065 are filtered by hedgerows with trees, there is scope for mitigation through increasing planting of trees along site boundaries, whilst development should align with the character and design aesthetics of Wolvey to ensure a cohesive and Harmonious appearance. The overall landscape sensitivity of the Site is therefore assessed as being Low/Medium.



RG have commissioned Aspect to undertake an initial **Landscape and Green Belt Overview** report. This concurs with the Council's findings in respect of the Site being assessed as Low/Medium Sensitivity, particularly due to its high degree of visual containment, with longer range views filtered by varying topography, vegetation and built form.

The report also highlights clear opportunities to integrate a high quality, landscape-led, residential development at the Site with the host settlement. This includes scope to:

- Create more sensitive and appropriate gateways into the village along the Coventry Road and Bulkington Road, to achieve a gentler transition with the surrounding landscape,
- Create a high quality green corridor and shared public open space along the existing PROW to improve access to the countryside, and
- Re-establish historic field patterns, which will also help visually break up the new development.

Again, the report concurs with the Council's view that there is scope for mitigation opportunities and this has helped inform the initial Concept Plan to ensure good landscape-led principles are adopted to achieve a sensitive development in landscape and visual terms.

Heritage

RBC confirms that no designated heritage assets are identified within 50 metres of the Site. Indeed, there are only 3 listed buildings within the village of Wolvey, including 2 Grade II listed dwellings (within the village centre, and the Grade II* listed Church of St John the Baptist located to the north east of the village. Hollytree Cottage on Wolds Lane is the nearest asset to the Site, at circa 250 metres, albeit this is separated by existing built form meaning it is not visible. The other two assets are further away and also obscured by existing built form and topography, so development of the Site will have no impact on any built heritage assets. Further investigations are taking place in respect of the potential for below ground heritage.

Other Constraints

The Stage 2 Site Options Assessment also notes that the Site is entirely within the Green Belt, and that it potentially makes a strong contribution to at least one purpose. It is however notable that this appears to have been made in the context of the only published Green Belt Assessment, which was produced in 2015 (West Midlands Joint Green Belt Study). This has however been superseded by the latest version of the NPPF (2024) and associated PPG: Green Belt and we are aware that RBC have commissioned a new Green Belt Study that will reflect the change in national policy

In advance of RBC's Green Belt Study being published, RG has commissioned Aspect to prepare a **Landscape and Green Belt Overview** report for the Site, set against the new NPPF and associated guidance. This concludes that the land would qualify as Grey Belt, meaning that it is not considered to be strongly performing in terms of the relevant Green Belt purposes and therefore given priority over other stronger performing Green Belt, in accordance with NPPF148. RG are fully committed to ensuring the contributions required by the 'Golden Rules' under NPPF156 are delivered as part of a comprehensive development, including higher levels of much needed Affordable Housing, improvements to local infrastructure and provision of extensive areas of new publicly accessible green space.

In terms of Foul Water drainage, it is noted that this is assessed as being a 'High' constraint. Enquiries have been made with STW regarding both foul drainage and water supply, confirming there are existing connection points to serve the Site, but it is likely improvements



to the networks will be required for the proposed development. This is to be expected in view of the scale of development envisaged but these can be delivered during the likely phased construction of future growth.

The report also notes that Surface Water constraints are assessed as 'Low'. This concurs with our Drainage Consultant's initial assessment which notes the Site lies wholly within Flood Zone 1. Surface water flows from the proposed development will be attenuated to the existing greenfield rates, with the most likely outfall to the existing watercourse bordering the Site's southern boundary, as per natural topography of the Site.

SUDS features will be incorporated within the scheme, as shown indicatively on the Concept Plan, and the subsequent detailed site drainage design will seek to maximise the benefits of these features in terms of water quality.

Conclusion

In summary, the PO and its supporting evidence base provide a clear strategy to meeting its future housing needs, taking account of the particular circumstances at play within the Borough. Key elements of this proposed strategy are an extension of that already independently examined and found sound by the Inspector for the currently adopted Plan. Whilst the majority of growth will continue to be focused in the most sustainable settlement within the Borough, in part due to the scale of development already committed at Rugby town, some growth distributed to the MRS, the 2nd most sustainable locations within the Borough, is both necessary and justified.

In respect of the Green Belt, a similar approach has also been taken to the currently adopted Local Plan, by taking reasonable decisions about the scale of release that is needed to help support a sustainable and deliverable supply of development land to fully meet future needs to 2045. The PO has balanced the issue of Green Belt release with a range of other factors that demonstrates a justified and effective strategy, capable of delivering the key objectives of the Plan and which aligns fully with the NPPF.

The site selection process has also been fully evidenced and clearly explains why decisions have been made regarding the scale and distribution of growth to the MRS in particular. A key driver to this approach has been to identify locations where the supporting infrastructure needed to deliver sustainable development is either available or can be delivered alongside the proposed growth. Issues such as primary school capacity and the availability of sustainable travel options have clearly played a fundamental part of decision-making. However, the PO has also sought to maximise the wider benefits of growth for the local communities that will accommodate this growth.

The proposed allocation of RG's land at Wolvey, alongside two other sites, fully aligns with the strategy adopted by the PO by delivering growth that can be supported by existing and improved services, facilities and public transport infrastructure, and which can also directly benefit the wider host community and create a more sustainable pattern of development.

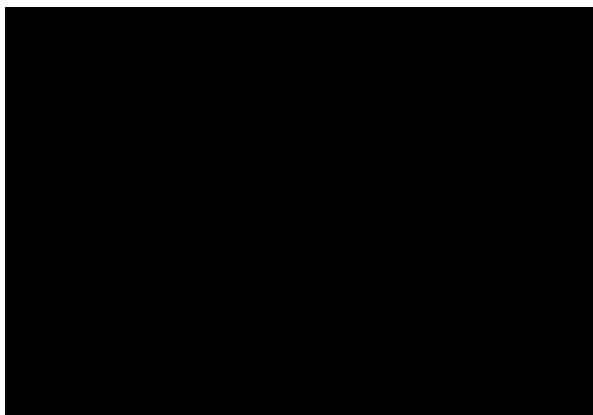
Land at Coventry Road, Wolvey (Site ID: 96) is a relatively unconstrained site that is well related to the existing settlement, capable of bringing forward the scale of residential development and complementary uses envisaged by the PO, whilst delivering improvements to a range of services and facilities to the benefit of the wider community. Rosconn are committed to working with RBC, the local community and other key stakeholders to ensure the proposals fully align with local objectives and which maximise benefits. Rosconn are also keen to work with the local community to help inform the emerging Concept Plan for the Site,



alongside the preparation of a Wolvey Desing Code to help secure high standards of design that reflect the local distinctiveness of the village.

Whilst we have highlighted some specific concerns in these representations in relation to specific policies, our general view is that the PO has been well evidenced and provides the basis of a Development Plan capable of being found sound at Examination. RG therefore fully support the overall PO and the specific allocation of their land at Wolvey and look forward to working with the Council to help support its adoption in due course.

Yours sincerely,



Encs.

- Wolvey Vision Document
- Concept Plan
- Transport Appraisal
- Initial Ecological Assessment
- Landscape & Green Belt Overview