

Your ref:
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RBC Local Plan Consultation



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

Submitted via email to: localplan@rugby.gov.uk

Dear Sir / Madam,

**Rugby Borough Council Local Plan (2024-45) Preferred Options Consultation
March – May 2025.**

**Publication of Local Plan for Consultation under Regulation 18 of the Town
and Country Planning (Local Planning) (England) Regulations 2012 (as
amended).**

**RE: Hillcrest Farm and Land East of Newton Lane, Newton, Rugby,
Warwickshire, CV23 0DZ.**

**Representations on behalf of Newton LDP (The Promoter) acting on behalf
of the Landowner.**

We write on behalf of Newton LDP in response to the content of the Rugby Borough Council Preferred Options Local Plan (2024- 45) document which has been published by Rugby Borough Council ('RBC') for the purposes of public consultation under Regulation 18 of the above stated regulations.

These representations are framed against the backdrop of our client's land and property interests at Newton, a 'Rural Village' as defined within the emerging plan.

The following submissions primarily build on the recent planning policy history for the Hillcrest Farm site at Newton and presents a rehearsal of the sites suitability towards assisting in the achievement of the Council's ambitious emerging strategic housing delivery target as presented within the consultation document. However, contextual information is also provided in respect of an additional parcel of land at Newton which is under the control of our client and is also immediately available to assist in meeting future growth requirements for the Borough.

After consideration of our client's interests and the settlement of Newton itself, focus turns to the Council's evidence base and subsequently the content of the Local Plan Preferred Options document.

For clarity, our client's interests are at Hillcrest Farm which is a residential development opportunity (Site A) of between 25 and circa 65 dwellings and land east of Newton Lane which is a commercially led mixed use development opportunity (Site B) of approximately 4 hectares. The aerial extract below shows the location of these two parcels in the context of the village. Dedicated site locations plans are also enclosed separately.

Figure 1: Site Location Plan



Site A: Hillcrest Farm

Hillcrest Farm comprises of the residential curtilage of Hillcrest Farmhouse and its wider complex of agricultural buildings which surround the residential property to the east and north. The remainder of the site, outside of those previously developed areas comprise of minor incidental parcels of agricultural land to both the west and north of the complex.

The entire site covers an area of Circa 3ha and is shown below on an extract from the Stage 2 Site Options Assessment. This was prepared by RBC to support the production of the consultation document and ultimately the Local Plan.

Figure 2: Hillcrest Farm



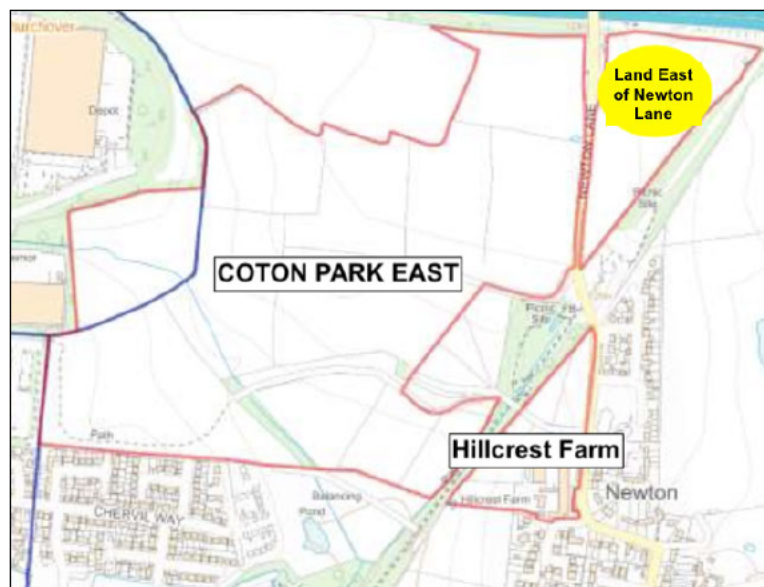
The dominant land use adjoining the site is residential with Newton Lane and the Great Central Walk providing distinctive boundaries to the east and west of the site.

The holding at Figure 2 was assessed by RBC as having no ecological or heritage constraints, of medium landscape sensitivity and significantly it is not within the

Green Belt as is the case with several of the plans proposed allocations. The Council's conclusions on the aforementioned technical matters align with that technical work which our client has progressed thus far.

Beyond the Great Central Walk which forms the western boundary of the site, the Council propose through emerging Policy S7 (Site 64) within the preferred options document that land be allocated for the creation of 115,000sqm of employment floorspace and other complimentary and ancillary uses. The extent of that allocation is shown below in the context of Hillcrest Farm. The client's additional interest, east of Newton Lane, is also shown.

Figure 3: Coton Park East (Policy S7 (Site 6)) Extent and Hillcrest Farm.



Part of the Hillcrest Farm site has already been identified as a suitable and sustainable location for residential development and as such has been allocated for that purpose within the preferred options document, an approach which is both welcomed and supported by our client. However, it is our opinion that greater sustainability benefits could be realised through the allocation of a larger site which responds to natural field boundaries, topographical features and the sites

immediate context.

Demonstration has been supplied in respect of the land's suitability, availability, achievability and viability through historic submissions to RBC. This submission, whilst primarily submitted in response to the Regulation 18 consultation and RBC's evidence base, also seeks to provide additional comfort in respect of near-term deliverability of dwellings at Hillcrest Farm.

To assist Officer's and the Parish Council, our client has prepared indicative masterplans relating to a series of development scenarios at the site which would deliver significant economic, social and environmental benefits. These scenarios seek to harness community aspirations whilst assisting in the sustainable growth of the settlement and meeting those housing requirements for the wider borough. In each case, the developments options would deliver proportionate contributions to local community and social infrastructure.

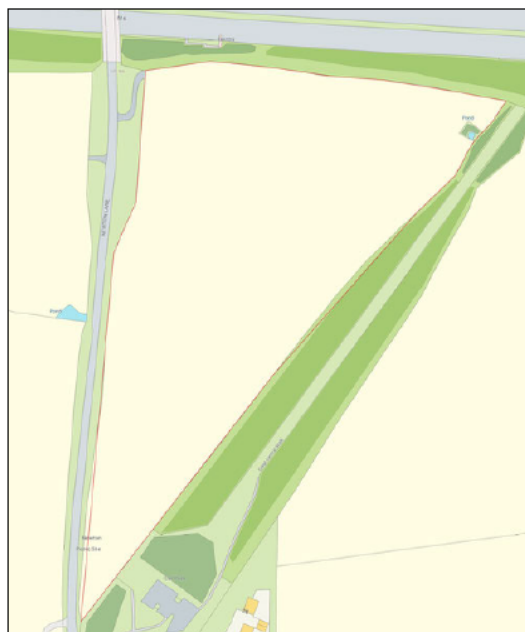
The three options comprise of a 25-unit proposal (Option A) on that land which is covered by the draft allocation within the preferred options document. This option has already been deposited with the authority and is enclosed once again. However, due to the potential of the draft allocation to sterilise land directly to the west and north of the draft allocation an additional proposal (Option B) for around 45 dwellings has been prepared. This increased option (encompassing land to the west) is also enclosed, along with a holistic option (Option C) which presents a high-quality design solution for the entire Hillcrest Farm site, comprising of 60-65 dwellings.

Site B: Land East of Newton Lane

Site B is bordered by the M6, Newton Lane and the Great Central Walk and is detached from the settlement envelope by the latter. Whilst that land is not promoted for residential development purposes, it is considered that it could reasonably and efficiently tie in with the proposed allocation for economic development purposes at Coton Park East and would be a suitable and viable opportunity to provide complimentary floorspace to the east of Newton Lane and allow for a suitable transition between commercial floorspace to the west, countryside to the east and Newton to the south, it also presents an opportunity to increase accessibility for all to the Great Central Way recreational route.

Once again, an indicative masterplan has been prepared to demonstrate how a commercially led mixed use development could come forward to the east of Newton Lane to compliment the anticipated growth to the east of Coton Park. This scheme has potential to deliver smaller startup business units to compliment the larger units proposed at Coton Park East.

Figure 4: Site B, Land East of Newton Lane, Site Location Plan



The Settlement

Whilst designated as a Rural Village through existing policy GP2 and emerging Policy S1, Newton is comparable in sustainability terms to a number of the Main Rural Settlements. Arguably, pro rata, it is more sustainable than many larger settlements due to its proximity to the urban area of Rugby. This is rightly acknowledged by the Council within the emerging plan and its evidence base.

Our client's interests at Hillcrest Farm straddle the settlement boundary to the northwest of the settlement and therefore share the same sustainability credentials as the village.

The RBC Rural Sustainability Study (December 2024) at Section 4, Para 4.1 and the table thereafter, confirms that Newton performs highly on sustainability rankings and that it is the 10th most sustainable settlement in the Borough. This confirmation is key contextual information when considering these representations.

An increased allocation at the settlement would provide greater surety of meeting community aspirations and needs which will be a foremost objective of any future planning application submitted by our client.

Those community aspirations have been identified through the recent Local Plan Regulation 18 consultation event held in April 2025. Additional information about these aspirations has been harnessed from both the Newton and Biggin Vision Statement and the Design Guidance and Code which have been published by the Parish Council.

The extent of the Hillcrest Farm site, as originally submitted in 2024, is shown at Figure 2 and it is confirmed within the RBC HELAA (2025), as being a suitable, available, achievable and viable opportunity for residential development. The respondent agrees with those conclusions and maintains that the wider site should be allocated in its entirety to secure the future of the settlement, make the best use of land and provide a defensible boundary with the Great Central Walk.

Whilst the preferred options document quite rightly continues to identify Hillcrest Farm as an appropriate site for development, the latest iteration presents an allocation which is vastly reduced against the Council's original proposals and there are concerns that a number of significant social, economic and environmental benefits for Newton will not be realised as a result of this revised approach. These benefits relate to landscape and visual impacts, access to recreational opportunities, sustainable urban drainage opportunities, affordable housing delivery and contributions to the usual range of social and community infrastructure.

The preferred options boundary is set out below at Figure 5 and through draft policy S6 the site is allocated for around 25 dwellings. It is considered that this should be increased to account for the wider holding as originally proposed by the Council.

Figure 5: Preferred Options Document (Policy S6) Site 87 Allocation



Notwithstanding the comments above, to provide certainty, the draft allocation is welcomed and is immediately available and there is already legislative and policy support for its immediate development.

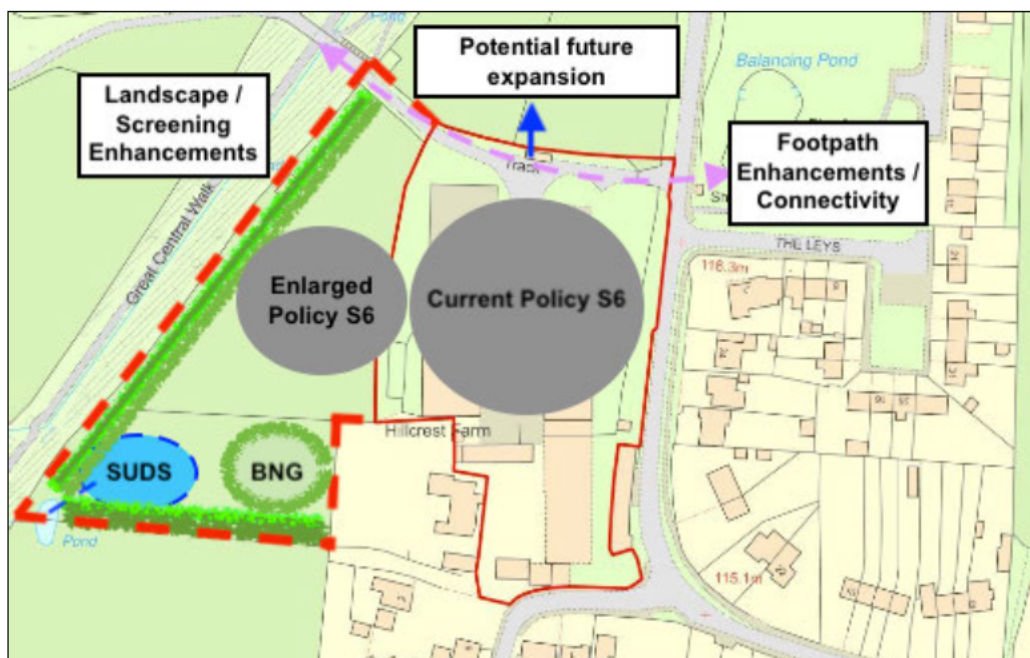
A modest area within the proposed allocation, capable of accommodating circa 5 – units, has immediate support through policy within the adopted RBC Local Plan (2019) for a residential development proposal due its location within the current settlement boundary for Newton. An indicative masterplan which demonstrates how these 5 dwellings could be delivered, accessed from The Hollies, has already been deposited with the Council and can be seen on the enclosed 25-unit masterplan as that minor element of the wider site accessed directly from The Hollies.

The balance of the site, outside of but adjacent to the village boundary, is largely covered by hardstanding and several buildings which benefit from the provisions of Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). As such, national legislation lends support for the immediate conversion of part of those existing buildings to ten dwellings

and the associated benefits of this growth could be realised within the village in the short term (0-5 years).

In its current form it is considered that draft Policy S6 does not make the best use of the wider site and through extending the allocation to the west several significant social, economic and environmental benefits can be realised, some of which are indicatively noted at Figure 6 below.

Figure 6: Potential Opportunities



It is urged that Officer's do not lose sight that there is a wider 3 Ha parcel of land where there is a general spatial acceptance of residential development, and the landowner has an appetite to deliver the site holistically. Through developing the site in its entirety, it is considered that community benefits would be maximised, and great strides would be made towards the realisation of the emerging vision for Newton as set out within the NDP documentation.

Given the dispersed nature of the spatial approach that RBC seek to advocate

within the emerging local plan, it is considered that Officer's may deem the more suitable option would be to allocate a parcel of circa 1.85Ha as shown at Figure 7 and detailed on the enclosed indicative masterplan, an extract of which is shown below.

Figure 7: Indicative Masterplan Option B (Extract)



It is considered that the most sustainable approach, for a site which is deemed to be the most suitable location for development at the settlement, could be to deliver a holistic development for the entire site. Through allocating the entire Hillcrest Farm site a modest proposal could mimic the more modern additions to the settlement to the east of Newton Lane. Such an approach would provide an attractive gateway into the settlement from the north and present a sustainable opportunity to harness increased social, economic and environmental benefits through building on those opportunities identified above. An extract from the enclosed indicative masterplan for the wider 3Ha site is set out below at Figure 8.

Figure 8: Indicative Masterplan Option C (Extract).



To conclude, all or part of the site remains available for development and there is a significant level of developer interest in bringing the site forward. There are no technical or other constraints which would prevent development at the site. The site is also confirmed as being immediately available and under the ownership of a single entity with an appetite to deliver dwellings at the settlement in the first five years of the plan.

Initial testing has concluded that a viable proposal of circa **45 to 65 dwellings** could be delivered across an extended Policy S6 allocation, such an allocation would allow for existing housing needs in Newton be met along with a policy compliant level of affordable housing in conjunction with high quality open market homes.

Rugby Borough Local Plan Preferred Options Consultation Document.

In respect of the consultation document, the efforts of RBC Officers to get the document to this point is to be commended.

Our client has not sought to undertake a wholesale appraisal of the document but rather seek to focus their representations on those salient points which are of relevance to the Hillcrest Farm site at Newton.

The objectives of the plan are in keeping with the thrust of the National Planning Policy Framework, it is however considered that they could be more locally specific and contain reference to meeting housing needs. The Hillcrest Farm site provides an immediately available opportunity to deliver both open market and affordable dwellings, plots for self-builders, bungalows for older persons and the entire range of dwellings which the needs profile requires.

The Settlement Hierarchy is largely appropriate and there is a general agreement with the approach advocated within Policy S1. However, Newton village presents a unique case whereby it sits lower in the hierarchy due to the offer of services and facilities within its settlement boundary, but the major positive is that it almost directly abuts the urban area of Rugby, the most sustainable location in the plan area. Therefore, it is considered that is justification for an increased level of housing delivery at the settlement.

At point ii) of Policy S1 it is considered that the reference to Neighbourhood Plans (NDPs) should be carefully considered, it is expected that NDPs will be required to deliver a level of development in excess of that which is allocated through policies within the emerging Local Plan.

At Policy S2, the commitments which are accounted for within 'Other allocations under Local Plan 2011-31' need to be carefully and pragmatically reconsidered and sites allocated accordingly to account for their non-delivery or under-delivery. An increased allocation at Hillcrest Farm would go some way in addressing this

matter. For example, it is considered that there are sites allocated through the previous local plan which have no chance of being delivered in the short term (0-5 years). As such, there is a case for increasing the allocation size at Hillcrest to both make up for this shortfall and to ensure that a sufficient and flexible supply of land for housing is available immediately.

Policy S5 needs to be clearly transposed on to the Proposals Maps to ensure that settlement envelopes encapsulate those site allocations which will be contained within the Regulation 19 version of the document.

It is urged that Policy S6 be suitably revised to allocate land to the west of the Hillcrest Farm allocation to enable the delivery of an increased level of housing on land which would be sterilised once the Hillcrest Farm complex itself is developed.

The enclosed masterplan demonstrates that a development of circa 45 to 65 dwellings could be delivered on an enlarged allocation at the Hillcrest Farm site which will provide a significant boost to housing delivery. Such an approach will enhance the vitality and viability of the settlement and assist in the achievement of those community aspirations which are being identified through the ongoing neighbourhood planning process. We of course remain happy to discuss this with Officers during their efforts to develop the submission version of the emerging Local Plan.

There are significant concerns regarding the achievability of Policy CL1 and whether the evidence base provides sufficient information to suggest that the targets within the policy can be realistically achieved. Whilst the notion of the policy is honourable, its content is too complex and there needs to be a thorough demonstration as to how Officers will assess proposals against its content.

Validation guidelines will need to be updated prior to the plan's adoption, and it is likely that a new SPD would be needed to assist applicants. For a policy to be successful it needs to be SMART, and it is questioned as to whether there are resources available to the Council to ensure that this policy could be successfully monitored.

Policy CL2 is at odds with the content of Policy CL1 and seeks to strictly control renewable infrastructure which is explicitly required by the content of the previous policy. It is urged that these aspects of the plan be reconsidered and amalgamated if possible.

Once again, policy CL3 could be suitably revised to ensure it is as concise as possible. In respect of Criteria A, a development will simply not come forward if there is not an adequate supply of water. In respect of Criteria C there are already sufficient controls within building regulations and Criteria D is not precise, any requirement that impacts adversely on financial viability could be deemed impracticable.

The collective implications of Policy EN4 A(i) (on-site BNG), EN5 (on-site canopy cover), EN8 C(i) (on-site air quality), H7 D (garden depths), W2 (open space), D3 (landscaping), I2 (parking standards) all need to be carefully considered. Whilst the HELAA has accounted for a simplistic calculation for housing numbers to be delivered from respective sites, there has been no account of the implications the policies will have on the density achievable within the net developable area and the consequential impacts on housing delivery. Through increasing policy requirements, the ability of a site to deliver housing is reduced, subsequently it is urged that additional land be allocated to ensure that these policy requirements can be met.

To rehearse, our client's wider site at Hillcrest Farm, Newton presents a sustainable development opportunity which is suitable, achievable and without any technical constraints to delivery, this is confirmed within the Council's HELAA Report (2025). Hillcrest Farm is immediately available and under the ownership of a single entity who is committed to delivering residential units to the market in the near term. An indicative approach is set out on the enclosed masterplan to increase the size of the proposed Policy S6 allocation at the site. This increase in size, and its associated social, economic and environmental benefits will hopefully be fully considered by the Council during efforts to develop the Regulation 19 version of the plan.

In conclusion, the sustainability credentials of the site are clear, notably so given it partially lying within Newton's development limits but also due to its proximity to the urban area of Rugby, the most sustainable location for growth in the plan area.

The above paragraphs, and Council's evidence base, present a case which confirm that the site is an immediately available sustainable residential development site. No barriers to bringing forward a development on the land have been identified and its suitability to assist in achieving the wider growth targets across the plan area are clear.

From a social standpoint, the proposal will deliver new houses to the market in a location where there is an identified need and increasing pressure for new homes across all tenures. Such a site would also contribute to the delivery of social and community infrastructure which will have a significant positive impact on Newton itself.

The economic benefits associated with housing growth are widely documented and far reaching beyond the initial benefits to the construction industry and its supply chain.

Over the longer term, the increased population would serve to increase the vitality of settlement and the viability of those services and facilities on which current residents rely. Along with this there are associated environmental benefits through landscape enhancements, attenuation features, biodiversity initiatives, tree planting, as well as the realisation of those energy efficiency benefits associated with new homes.

It is hoped that the above and attached will be positively considered by the Council and we would be more than happy to answer any questions which you may have.

Therefore, if you require clarification on any of those points which have been raised above or require any further information then please do not hesitate to contact us via any of those channels listed.

[Redacted Signature]


Associate

Land at Hillcrest Farm, Newton
- Option D

NEWTON

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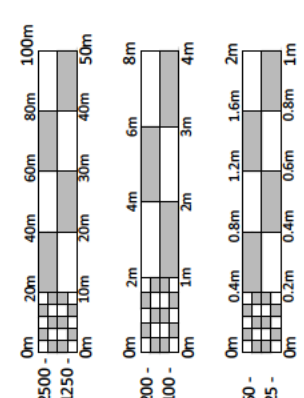
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Rev	Date	Notes



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architects

Project:
PROPOSED DEVELOPMENT
HILLCREST FARM, NEWTON, RUGBY

For:
Mr Foxon

Drawing:
PROPOSED SITE LAYOUT

Drawing scale:
1:500 at A3


Drawing no.
WG1386-201

Drawing date:
JANUARY 2024

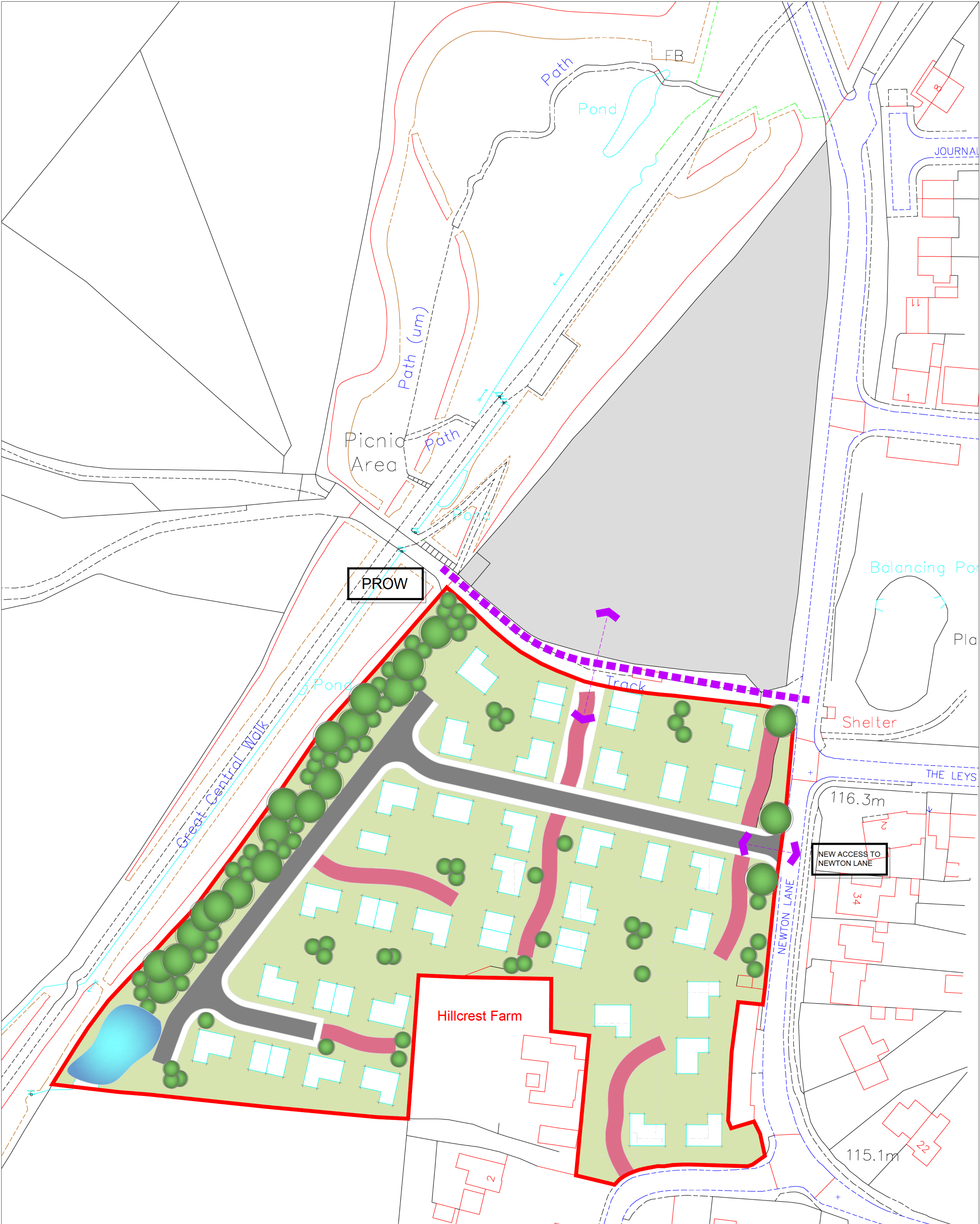
Revision

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The diagram illustrates a proposed residential development site. The site is bounded by a red line. Inside the site, there are several plots labeled Plot A through Plot T, Plot 1 through Plot 5. Each plot contains a house and a garage. The plots are arranged in a grid-like fashion. To the north of the site is a track, and to the east is Newton Lane. To the south is The Hollies. To the west is Hillcrest Farm and Hillcrest Farm House. A red dashed line indicates agricultural barns to be demolished. A shared driveway is shown. A new junction onto Newton Lane is indicated. Existing access points and new access points to serve the frontage of proposed dwellings are shown. The diagram also shows a new junction onto Newton Lane and a new access point to serve the frontage of proposed dwellings.



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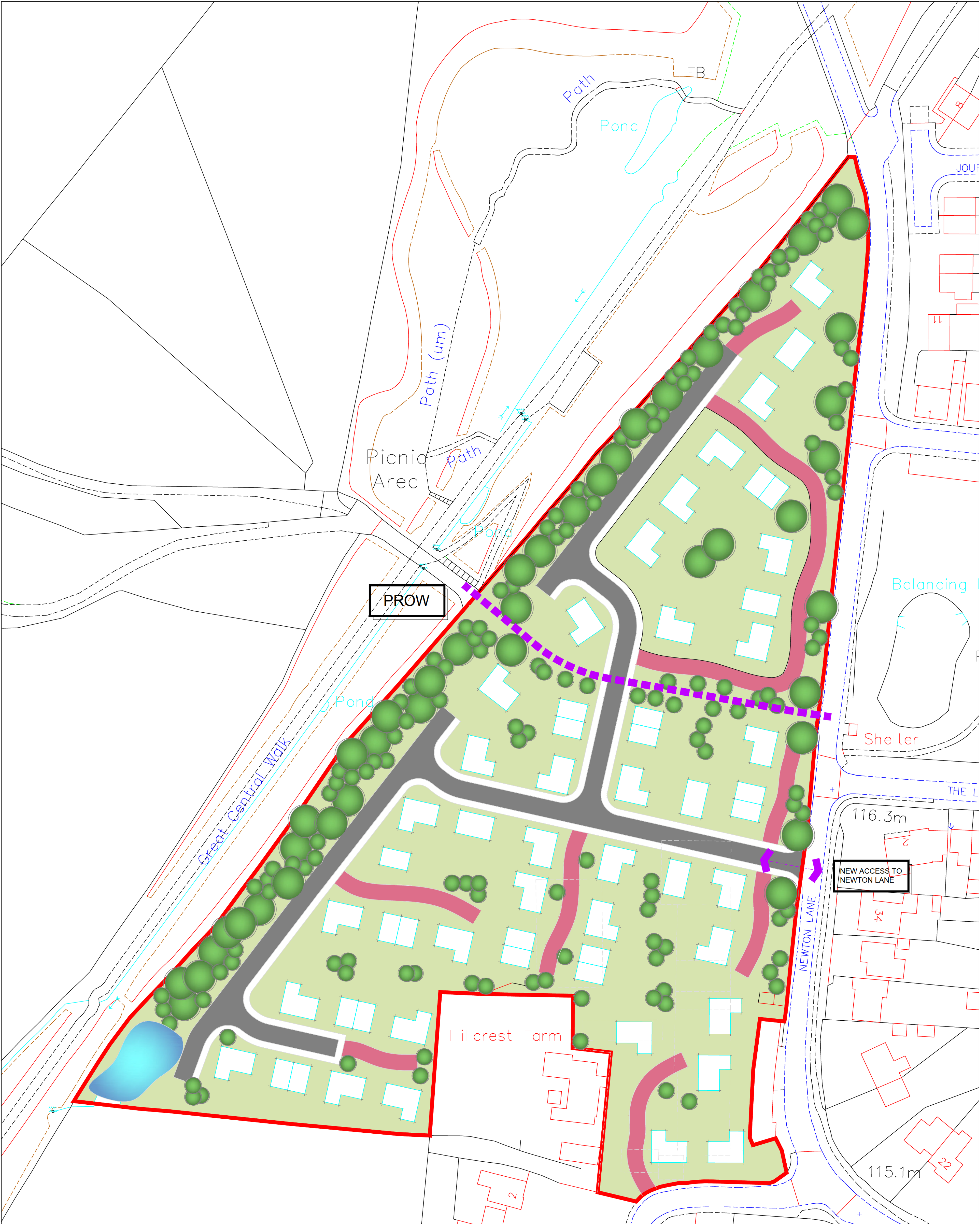
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client	CCTP	drafted by:	LMR	checked	LW
site	LAND OFF NEWTON ROAD NEWTON, RUGBY	scale	1: 500 @A1	date	May 2025
drawing title	PROPOSED MASTERPLAN	drawing number	025 - 016 - 001	rev.	-



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CCTP

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NEWTON, RUGBY**

drawing title
PROPOSED MASTERPLAN

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LMR

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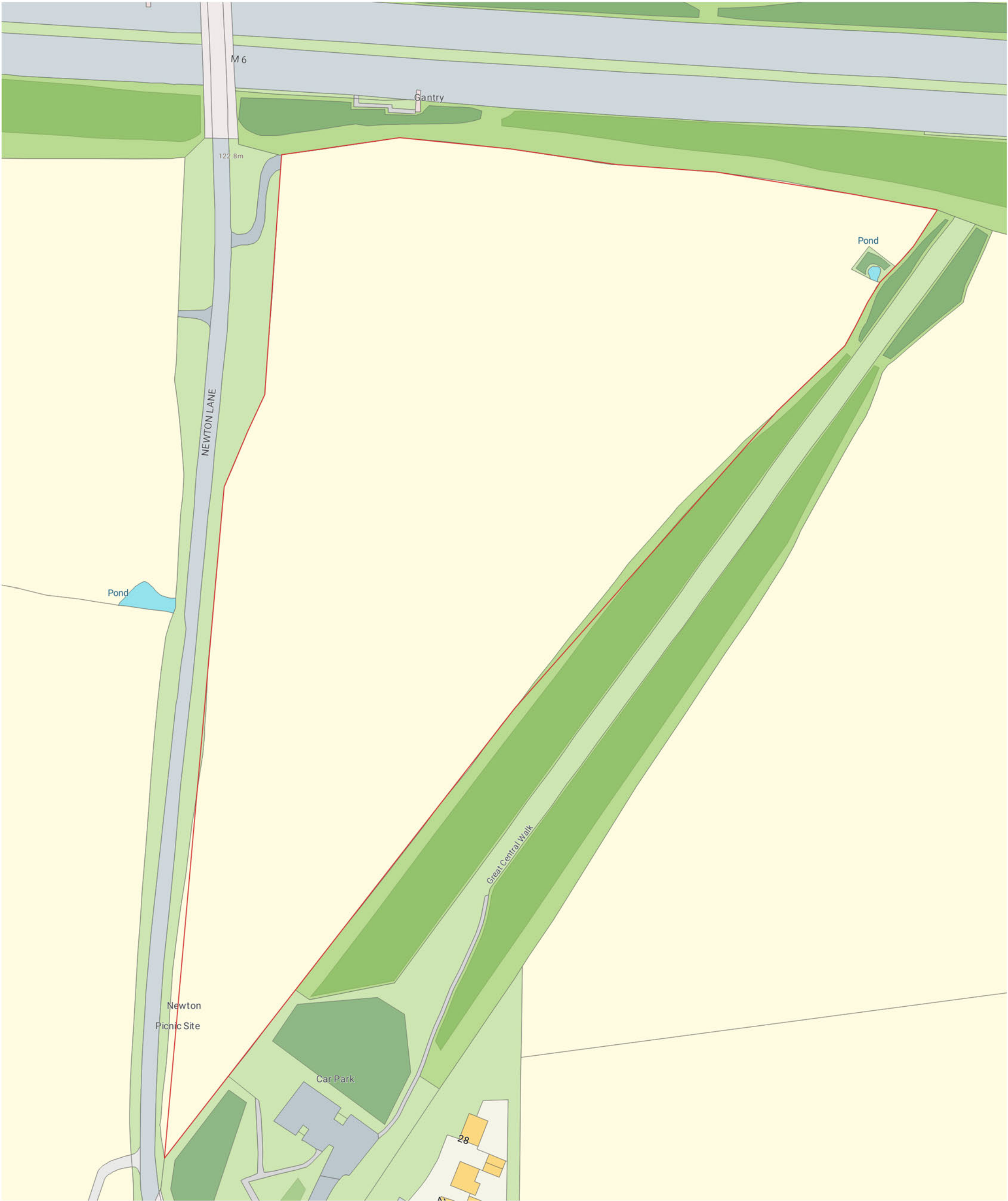
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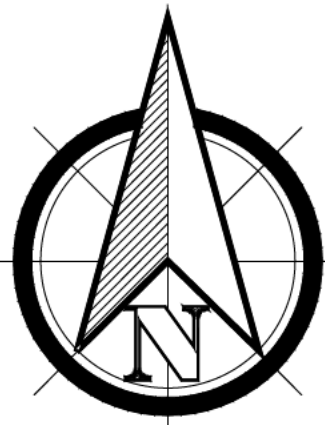
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Land to the east of Newton
Lane and south of M6, Newton

NEWTON

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drawing title	MASTERPLAN - COMMERCIAL	drawing number	025 - 016 - 003	rev.	-

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1: 39 0' 3/8m 1 5/8m

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