

RUGBY BOROUGH LOCAL PLAN: PREFERRED OPTIONS CONSULTATION (REGULATION 18)

Representations on behalf of St Modwen Homes (Lodge Farm)

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REPORT

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1 INTRODUCTION

- 1.1 These representations have been prepared on behalf of St Modwen Homes ('St Modwen') in response to the Rugby Local Plan Preferred Options Document ('POD') published by Rugby Borough Council ('the Council'). The representations have been prepared in light of St Modwen's interests at Lodge Farm ('the site').
- 1.2 The Council took the decision in October 2023 to progress the Local Plan update under current plan-making system and, as a result, expect to adopt the new Local Plan during 2027¹. Any references of relevance to national planning policy in these representations refers to the latest version published in December 2024, in accordance with the transitional arrangements².
- 1.3 We have reviewed the consultation material and set out our representations on the POD, the Interim Sustainability Appraisal ('ISA'), and the various supporting documents as necessary to support this response. We note that the Council has not issued any specific questions to support the consultation, nonetheless our responses have broadly aligned with the draft policies.
- 1.4 Further details are provided in an updated Vision Document (**Appendix 1**) and associated supporting technical relating to Landscape (**Appendix 2**); accessibility (**Appendix 3**) and education matters (**Appendix 4**) all of which provides up-dated information from that submitted to the Council which was submitted as part of the previous 2024 call for sites exercise.
- 1.5 RPS and St Modwen would welcome further opportunity to engage with Rugby Borough Council ('the Council') on the emerging Local Plan review as it moves forward.

¹ Agenda No 6 Cabinet – 23 October 2023 Local Plan Issues and Options Consultation Public Report of the Chief Officer – Growth and Infrastructure

² National Planning Policy Framework, December 2024

2 PLAN PERIOD

- 2.1 As part of the issues and options consultation, the Council presented two options for the plan period for the new Local Plan; based on a 2045 or 2050 end date. Following that consultation, the Council has chosen 2045 as the proposed end date, as expressed in draft Policy S2 (Strategy for Homes). This results in an emerging plan period of 21 years (2024-2045) assuming a base date of 2024.
- 2.2 The Council provides some supporting commentary on the proposed plan period in the Development Needs Topic Paper (paragraphs 1.3-1.7). The Council assumes adoption of the new Local Plan at some point during 2027. On this basis, the plan period would be a minimum of 15 years from adoption and which would extend beyond the minimum end date of 2042, in accordance with national policy (NPPF, paragraph 22).
- 2.3 Nonetheless, the Council has not sought to align the plan period to with the South Warwickshire Local Plan which is proposing a plan period up to 2050. We see no reason why Rugby should not follow the same timeframe. This would help ensure that development needs across the sub-region (Coventry and Warwickshire) are addressed on a consistent basis and would ensure effective cross-boundary engagement across the different plans.
- 2.4 Additionally, we note some of the Local Plans emerging evidence base, including the West Midlands Strategic Employment Strategy and Alignment Papers cover the periods to 2050. However, the Council has selected the earlier end date (2045). It is not clear in the topic paper or the Local Plan as to why the earlier end date has been selected. We suggest it is entirely logical and proportionate for the new plan to align with the evidence base even where his extends beyond the minimum (15 year) timeframe.
- 2.5 **A 2050 end date would mean the Plan takes an appropriate evidenced based stance and a strategic overall approach to timescales, consistent with NPPF paragraphs 17 and 22 with an additional 3,000 dwelling requirement, be sufficient to enable Lodge Farm proposals to come forward.**
- 2.6 **Taken together, we recommend that the plan period should be extended to cover the period to 2050. Should the Council not follow this approach this matter will need to be pursued through to the Local Plan Examination process.**

3 SCALE OF GROWTH (POLICY S2)

The need for an Increased Housing Requirement

- 3.1 Draft Policy S2 identifies a housing requirement of 12,978 dwellings to be delivered between 2024 and 2045. This equates to 618 dwellings per annum, which is also the minimum number of homes needed in Rugby based on the December 2024 standard method.
- 3.2 The use of a minimum local housing need figure in the Local Plan has been taken directly from the figures calculated by Government under the new standard methodology set out in planning guidance. Nevertheless, the housing need figure is only the starting point for setting a housing requirement, as recognised in planning guidance (referenced below).
- 3.3 Notably, national policy makes clear that an important role of the planning system is to support the Government’s objective of significantly boost the supply of homes³, and that the housing requirement may be higher than the identified need⁴. Similarly, planning practice guidance (PPG) says that the housing requirement is the minimum number of homes that a plan seeks to provide for during the plan period, and that once local housing need has been assessed authorities should then make an assessment of the amount of new homes that can be provided in their area. The PPG advises this should be justified by evidence on land availability, constraints on development and any other relevant matters⁵. This is new guidance that only came into effect in December 2024, but which the Council should take into account when establishing the housing requirement in the new Local Plan.
- 3.4 There is clearly an encouragement at a national level for local authorities to consider setting housing requirements that are higher than the minimum numbers needed in their area. A key ‘relevant matter’ that should be taken into account in determining the requirement is the trend in housing delivery seen in the borough during the plan period to date. Notably, we have seen a significant uplift in delivery of homes in Rugby during the period 2018-2024. The Council has described this as a ‘sizeable over-delivery’ against adopted requirements. We summarise the figures below, taken from the Council’s own monitoring data.

Table 3-1 Housing delivery and requirements – Rugby Borough (2011-2024)

Year	Annual Requirement	Actual net dwellings
2011/2012	540	338
2012/2013	540	456
2013/2014	540	448
2014/2015	540	425
2015/2016	540	534

³ NPPF 2024, para 61

⁴ NPPF 2024, para 69

⁵ Paragraph: 040 Reference ID: 2a-040-20241212 Revision date: 12 12 2024

2016/2017	540	376
2017/2018	540	596
2018/2019	663	939
2019/2020	663	859
2020/2021	663	832
2021/2022	663	939
2022/2023	663	1,349
2023/2024	663	873
Total	7,758	8,964

Source: RBC

3.5 These figures show that 688 dwellings were built on average since 2011, but this increased to 965 dwellings each year since 2018. This is summarised below.

Table 3-2 Housing delivery measures - Rugby

	No. of dwellings (pa)
Average delivery 2011-24	688
Average delivery 2018-24	965
Average annual requirement (adopted)	597
Average annual need / requirement (emerging)	618

3.6 We can see that the emerging annual housing requirement (618) is 36% lower than the rate of housing delivery since 2018 (965), amounting to 347 dwellings per annum. It is clear on any reasonable assessment that Rugby is able to provide for a greater number of homes than the minimum numbers needed in the borough. Under the new Plan, the Council is effectively planning for decline, rather than boosting the supply of housing. Similarly, there are no obvious constraints on delivering a higher quantum of growth based on land availability, given the Council’s decision to reject the allocation of land at Lodge Farm (site 73) which could deliver sustainable development in the borough.

3.7 Furthermore, setting the housing requirement for the borough at the minimum level only serves to depress the potential for delivery of more affordable housing. The Council’s own evidence, set out in the Housing and Economic Development Needs Assessment (HEDNA) (2022) identifies a need for 407 affordable homes per annum. Whilst not directly comparable, it is nonetheless around 66% of the overall need in the borough. We contend that further consideration should be given to increasing the total housing figures to assist in the delivery of more affordable homes, in accordance with national policy⁶.

⁶ Paragraph: 024 Reference ID: 2a-024-20190220 Revision date: 20 02 2019

- 3.8 We note the potential need for uplifts against minimum housing requirements is a matter that is currently being considered at Local Plan Examinations. We see no plausible explanation of why Rugby Borough Council has not considered this approach.
- 3.9 On this basis, the emerging plan is seeking to plan for the absolute minimum number of homes need and ignore the capability of the borough to accommodate greater levels of growth. The draft policy is not positively prepared and is not justified and in RPS' opinion is real danger of being found unsound through the EiP process. We contend that the housing requirement in the Rugby Borough Local Plan should be increased to reflect recent trends in housing delivery and to address affordable housing need.
- 3.10 We recommend that the housing requirement should be adjusted to reflect these issues to ensure proper alignment with the evidence base. The effect would be to increase the housing requirement from 12,978 (or 618 dpa over the 21-year plan period as a minimum) to 17,888 (which equates to 688 dpa over 26 years); an overall increase of 4,910 dwellings over the minimum need-based requirement. This would incorporate the 3,090 dwellings increase based on extending the plan period by a further five years (to 2050), with additional flexibility. The additional supply of land could be addressed, in part, through the allocation of additional non-Green Belt land, notably the Lodge Farm site.**

4 STRATEGY FOR THE DISTRIBUTION OF GROWTH (POLICY S2)

4.1 The emerging spatial strategy and distribution of housing growth is essentially split across two policies; Policy S2 (Strategy for Homes) and Policy S6 (Residential Allocations). Further information on the justification for the preferred strategy is set out in the 4 March 2025 Cabinet Report⁷, which sought approval for the draft plan consultation, and in the Interim Sustainability Appraisal.

Overall distribution of growth – ‘ more dispersed strategy’

4.2 The Local Plan (para 1.5) states that much of the housing growth to meet the requirement is already committed through the Houlton, South West Rugby and Eden Park SUEs, which will continue to be built out during the plan period. The residual development on the South West Rugby strategic site is also carried forward. Additional sources of supply will be windfalls on sites of fewer than 5 dwellings, non-allocated sites within settlement boundaries, estate regeneration and new allocations made through neighbourhood plans (para 1.7).

4.3 The breakdown in housing distribution proposed in draft Policy S2 is set out below, which shows the split between existing and new sources of housing.

Table 4-1 Overall provision of housing to 2045 – Rugby Borough

Source	No. of dwellings
Existing strategic sites and other existing allocations,9,746 and extant commitments	
New allocations (listed in Policy S6)	3,338
Small site windfalls	1,050
Total	14,134

Source: Draft Policy S2

4.4 In terms of new allocations, the table below shows the proposed split in distribution by location and status (notably, whether the site is in a Green Belt or non-Green Belt location).

⁷ Local Plan Preferred Option Consultation, Cabinet 4 March 2025, Chief Officer - Growth and Investment, Growth and Investment, Digital and Communications (Agenda Item 6)

Table 4-2 Proposed distribution of new site allocations

Location	No. of Dwellings	% of new allocations
Rugby urban area sites ⁸	1,190	35%
Rural settlements (non-Green Belt) ⁹	420	13%
Rural Settlements (Green Belt) ¹⁰	1,728	52%
All new allocations	3,338	

Source: draft Policy S2

4.5 The Local Plan itself does not provide any further details on the reasoning or justification for the proposed distribution of housing planned for up to 2045.

Focus on Rugby Town

4.6 A first key strand of emerging strategy is the continued focus of growth on Rugby town. According to the Council, around 75% of future homes to be built by 2041 are directed to Rugby town, and 60% of homes will be provided at South West Rugby, Houlton and Eden Park strategic sites.

4.7 The Council describes this approach as a ‘more dispersed strategy’ to the allocation of additional residential sites, as highlighted in the Cabinet Report¹¹. The Report identifies six reasons for the preferred strategy under Policy S2:

- Providing more opportunities for small and medium sized sites in a wider range of locations beyond Rugby town - described as ‘*Avoiding an ‘all eggs in one basket’ approach*’
- Infrastructure strain impacting on Rugby – meaning a further extension to Rugby is ‘*not favoured*’
- Viability ‘challenges’ at South West Rugby (and also the Houlton site), a strategy focussed on small and medium sites is likely to deliver proportionately more affordable housing more quickly

⁸ Includes sites proposed at Rugby (site 62,332,122,40,334, Brownsver (59) and Houlton (338), which are all located within the Rugby Town boundary (Policy GP2)

⁹ Sites 87, 100, 129, 202,307, 341, 90 (non-Green Belt)

¹⁰ Sites 309,96,84, 315, 337, 134, 81, 6, 316, 75 (Green Belt sites)

¹¹ Paragraph 9.4

- The large sites put forward for consideration all had significant uncertainties over their traffic impacts, the scope of mitigation that would be needed and their ability to fund that infrastructure
- Opportunities to utilise existing infrastructure in villages where school rolls are dwindling and to improve the range of facilities at villages, improving their sustainability

4.8 At the strategic level, we acknowledge there are issues regarding the continued focus of future growth on Rugby town, in terms of deliverability and delays in progressing the strategic sites. This would suggest that the existing strategy focus on Rugby has reached (or likely to reach) 'saturation point' in terms of the ability of the town to absorb future growth. Nonetheless, these are clearly issues that are impacting on Rugby town, predominantly as a result of previous local plans, which concentrated a significant amount of growth on the town.

4.9 However, the Local Plan is still proposing a further c.1,200 additional dwellings at the town, including a number of extension sites beyond the settlement boundary. In light of the Council's concerns regarding deliverability and infrastructure capacity, it is unclear what the rationale is for concentration of growth at Rugby town beyond the existing committed development sites. Similarly, further concentration of growth at the town is likely to exacerbate existing capacity problems, including potential impacts on the transport network, which was raised in responses to the Issues and Options consultation¹². We note that the Strategic Transport Assessment (STA) is in progress, but has not been issued as part of this consultation.

4.10 In summary, we contend that the continued focus of further growth on Rugby town is at odds with the issues and problems identified with the current focus of growth that has underpinned to adopted Local Plan to date, but which could potentially undermine the intended strategy. The Council should re-consider its approach with regard to Rugby town.

Distribution of growth to rural settlements

4.11 National policy advises that Green Belt boundaries should only be altered where 'exceptional circumstances' are fully evidenced and justified¹³, and before concluding that such circumstances do exist the relevant authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development¹⁴. In addition, where land is proposed for release from the Green Belt through plan review, the 'Golden rules' should apply, including the provision of 50% affordable housing¹⁵.

4.12 This is relevant national policy because the second strand of the emerging strategy is the focus of growth at the main rural settlements, a number of which located in the Green Belt. The greater

¹² 4 March 2025 Cabinet Report, Appendix 2 Local Plan Issues and Options Consultation Report, section 3

¹³ NPPF 2024, para 145

¹⁴ NPPF 2024, para 147

¹⁵ NPPF 2024, para 156

proportion being directed to Wolvey, Brinklow and Long Lawford which are all located in the Green Belt (Local Plan, para 1.17). This amounts to 1,780 dwellings (52% of the new allocations, and 12% of the total provision of housing land).

4.13 Some commentary regarding these settlements is provided in chapter 5 of the Interim SA (ISA) (Defining Growth Options). Under the sub-section ‘Strategic Factors’ (5.2) the broad spatial strategy section refers to ‘infrastructure’ an important issue. Here, the ISA says that primary school capacity in countryside villages(based on existing ‘headroom’ capacity) and possible expansion of existing primary schools are two key issues with a bearing on spatial strategy, and specifically the distribution of housing growth across the Main Rural Settlements. Nonetheless, the ISA recognises that generating a firm understanding (of these issues) is challenging and there will be a need for ‘ongoing dialogue and detailed work’¹⁶.

4.14 Despite this uncertainty, the Local Plan proposes the following distribution of housing at the rural Green Belt settlements. The sub-section ‘Settlement (etc) scenarios’ provides some commentary in respect of growth proposed at each of these Green Belt villages¹⁷. The table below summarises the justification provided and our response on these matters.

Table 4-3 Proposed distribution to rural (Green Belt) settlements

Settlement	Dwellings per settlement	RBC justification	RPS comments
Newton on Avon	20	No evidence provided to justify the distribution	No Green Belt Assessment undertaken to support release. Without any clear justification, the housing distribution at the settlement should be removed from the Plan
Long Lawford	400	Potential to deliver ‘targeted community infrastructure, including GP Surgery on site’ (ISA, para 5.4.52)	No Green Belt Assessment undertaken to support release. No education-related evidence provided re. primary school needs. No viability testing, re. 50% affordable etc under ‘Golden Rules’ – housing distribution not evidenced
Stretton-on-Dunmore	178	Primary school capacity to support around 150 homes over-and-above commitments (assuming the objective is to avoid children having to travel to a school) (ISA, para 5.4.63)	No Green Belt Assessment undertaken to support release. No evidence provided on primary school capacity at the settlement. No viability testing re. 50% affordable etc under ‘Golden Rules’ – housing distribution not evidenced
Brinklow	415	Housing growth at Brinklow could help support primary school demand (based on	No Green Belt Assessment undertaken to support release. No viability testing re. 50%

¹⁶ ISA, para 5.2.63-5.2.64

¹⁷ ISA 5.4

		falling rolls at Monks Kirby school) (ISA, para 5.4.32)	affordable etc under 'Golden Rules'. Council accept that existing school site could be expanded at Minks Kirby – insufficient evidence provided to justify such significant growth at Brinklow.
Wolvey	710	Support for large-scale growth to deliver a primary school expansion (ISA, para 5.4.77)	No Green Belt Assessment undertaken to support release. No education-related evidence provided re. primary school needs. No viability testing, re. 50% affordable etc under 'Golden Rules' – housing distribution not evidenced.

Source: POD, Interim SA

4.15 The summary above illustrates a lack of evidence on a range of factors which, in our view, does not justify the scale of housing growth proposed for distribution to these Green Belt rural settlements. This includes no Green Belt Assessment (which we understand will be published a future date) to show that the proposed distribution is justified in Green Belt terms, no viability evidence that the allocations are capable of delivering the 'Golden Rules' under the new NPPF, notably 50% affordable housing on individual sites, and very limited evidence provided in regard to the need for additional housing to support local rural primary schools.

4.16 Accordingly, the Council should revisit the proposed distribution at the rural settlements based on a 'dispersed' strategy in the next iteration of the Plan. In our view, the distribution of over 1,700 dwellings to locations in the Green Belt has not been adequately justified.

4.17 Furthermore, whilst the 'dispersed' strategy involving Green Belt release is favoured, the Council accepts that it is capable of delivering the necessary additional housing land outside of the Green Belt if land promoted at Lodge Farm (the land being promoted by St Modwen) between Dunchurch and Daventry, which (on the Council's assumptions) could deliver 2,680 homes overall with an estimated 1,800-2,000 by 2045, were to be allocated. The Council states, nonetheless, this option is not favoured:

*"...because of the concerns identified above about deliverability, infrastructure and risk that arise from allocating another large strategic site to meet the bulk of the residual housing need. It is also not favoured because it would not deliver a secondary school in north Rugby. Furthermore, a pattern of concentrating housing on a further very large site, with no more housing allocated in the borough's main rural settlements except for the non-Green Belt villages of Clifton-upon-Dunsmore and Dunchurch does not represent a sustainable pattern of development."*¹⁸

4.18 This, in combination, the Council says amounts to the 'exceptional circumstances' which justify alterations to the Green Belt boundaries¹⁹. We have a number of concerns with this approach.

¹⁸ Cabinet Report, para 9.7

¹⁹ Cabinet Report, para 9.8

- 4.19 **Firstly**, the Council provides no clear evidence to substantiate its claim that bringing forward development at Lodge Farm alongside development at the non-Green Belt villages cannot achieve sustainable development patterns.
- 4.20 **Secondly**, whilst delays may have impacted on the speed of delivery at which development is coming forward on the existing strategic sites at South West Rugby, Eden Park, and Houlton, all these sites share a boundary with Rugby town and are closely linked to Rugby town housing market. In contrast, Lodge Farm is located outside Rugby at a distance (but well connected to the town) which underpins its status as a potential new settlement – a matter the Council accepts. It is wholly unjustified to seek to define Lodge Farm as an ‘extension’ to Rugby alongside these existing allocations, and then to use this as a reason to exclude the site at this stage.
- 4.21 **Thirdly**, as we explain in more detail below, the premise that allocating the Lodge Farm site would not be favourable because it would not address education needs in the north of Rugby is unfounded and does not form a credible basis for the emerging strategy. This is particularly so, for two reasons:
- It is understood the Council’s proposed strategy to fund any new secondary school to the north of Rugby Town is via financial contribution from the new housing sites, wherever they are within the borough.
 - The Lodge Farm proposal includes a commitment to a new secondary school. This would be self-financed and deliver secondary school capacity for the new residents of Lodge Farm.
- 4.22 Taken together, we consider the Council’s reasoning does not establish the exceptional circumstances to justify releasing land from the Green Belt at the rural settlements for residential development in the emerging local plan. Furthermore, the proposed release of Green Belt land in Rugby is unnecessary, in light of the non-Green belt housing option available at Lodge Farm.

Addressing education needs in the borough

- 4.23 The third key strand of the emerging strategy, and which forms one of the reasons given in support of the more dispersed strategy highlighted by the Council, is the focus on education provision in the borough. This includes apparent opportunities to utilise existing infrastructure in villages where primary school rolls are dwindling and to improve the range of facilities at villages, improving their sustainability. This approach has resulted in proposed allocations in both Green Belt and non-Green Belt settlements in the rural area. It is therefore critical that the education matters that have informed the dispersed strategy is underpinned by adequate and proportionate evidence, as required by national policy (NPPF 2024, para 32).
- 4.24 In addition, part of the strategy is predicated on the need to address a ‘headline issue’ regarding secondary school capacity at Rugby and a new secondary school in the north of Rugby town (Interim Sustainability Appraisal, para 5.2.61). We assume this allocation is proposed following advice

received from the Local Education Authority (LEA) Warwickshire County Council (WCC). This is alluded to in the 4 March Cabinet report²⁰. We take each issue in turn.

New Secondary School provision

- 4.25 The Local Plan includes a proposed allocation on the north-eastern edge of Rugby to accommodate a new secondary school. This is important because the provision of a new secondary school in north Rugby is a major reason why Lodge Farm has been discounted.
- 4.26 However, it is not clear whether the new school allocation is seeking to support future education demands generated by additional housing provision in the north of Rugby. This is because no significant housing provision is being proposed, through new allocations, in this part of the town up to 2045, apart from one allocation identified in close proximity to the proposed school site. On the contrary, the proposed school allocation is primarily seeking to address existing capacity issues around secondary school places in the north of Rugby, in particular needs generated by the existing Houlton strategic site (ISA, para 5.2.61-5.2.62).
- 4.27 Furthermore, there appear to be significant issues affecting deliverability of the new secondary school proposal, notably a loss of £20m Basic Needs funding from Government that would help deliver additional school places. This must bring into question the economic viability of the proposed school allocation. Given these funding issues, there are clearly potential benefits from allocating the Lodge Farm site, which is a deliverable site of sufficient scale to potentially enable the provision of new education facilities on-site, or to help fund additional bus services for children to access existing schools in the borough, as part of a wider social benefits package.
- 4.28 Consequently, given the school proposal is not linked to the future housing needs of Rugby (rather, it's purpose is to address current shortfalls in secondary school places) it is disingenuous to use the secondary school issue as a reason to discount potential housing sites to the south of the town, notably Lodge Farm, as stated in the ISA. The two issues are clearly separate in nature and should not be conflated in order to justify the proposed strategy or the exclusion of Lodge Farm.
- 4.29 The Council should revisit its approach to addressing secondary school needs as part of the next iteration of the plan, in light of the issues raised in this response.

Rural Primary School provision

- 4.30 As we have explained above, the Local Plan does not adequately explain the justification for releasing large-scale Green Belt sites in the rural area on the grounds of education-related factors. This undermines the evidential basis for the significant allocation of land for housing in the rural area. The evidence provided does not, in our view, constitute exceptional circumstances required to justify further Green Belt release for residential development.

²⁰ Paragraph 9.1

4.31 Taken together, we contend that the evidential basis for directing growth to the rural Green Belt settlements on education grounds is not adequately justified, which further undermines the claim that 'exceptional circumstances' exist to justify releasing Green Belt sites at the rural settlements.

4.32 Attached at **Appendix 4** is a specific report which addresses the education issues highlighted above.

Summary on the proposed 'dispersed' strategy

4.33 Our responses on the 'dispersed' distribution strategy proposed under Policy S2 raise a number of important issues, namely:

- We contend that the continued focus of further growth on Rugby town is at odds with the issues and problems identified with the current focus of growth that has underpinned to adopted Local Plan to date, notably infrastructure impacts and deliverability issues which could potentially undermine the intended strategy. The Council should reconsider its approach with regard to accommodating further growth (beyond existing sites) at the town.
- The significant quantum of growth directed to the rural settlements is essentially 'capacity-led', however there is a lack of evidence on a range of factors which, in our view, does not justify the scale of housing growth (c. 1,700) proposed for distribution to the Green Belt rural settlements. Notably, the Council has not established 'exceptional circumstances' to justify releasing large swathes of land from the Green Belt at the rural settlements for residential development in the emerging local plan.
- Furthermore, the proposed release of Green Belt land in the borough is considered to be unnecessary, in light of the non-Green belt housing option available at Lodge Farm
- The evidential basis for directing growth to the rural Green Belt settlements on education grounds is not adequately justified, which further undermines the claim that 'exceptional circumstances' exist to justify releasing Green Belt sites at the rural settlements.

4.34 In light of our response, the Council should revisit the 'dispersed' distribution strategy as part of the next iteration of the plan.

5 PROPOSED RESIDENTIAL ALLOCATIONS (POLICY S6)

5.1 The preceding two sections of our response (in regard to the overall housing need and distribution strategy under Policy S2) highlights a number of issues and concerns with the proposed strategy.

5.2 Policy S6 identifies a number of new residential site allocations. We have reviewed the evidence base for these sites, notably the Stage 2 Site Assessment Report and other supporting documents. We set out our comments on those sites we consider have issues and which should be removed from the plan at this stage. A summary of our analysis on the selected sites is set out in the following table.

Table 5-1 RPS review of proposed residential site allocations (Preferred Options)

Ref.	Settlement	Site name/address	Dwellings	RPS comments	Recommendation
122	Rugby	Land at Fenley Fields	80	Site is virtually landlocked. Access constraints – unclear whether suitable access (via Lime Tree Avenue) can be suitably provided without demolishing adjacent dwellings	Remove
338	Rugby	Land south of Crick Road	250	Question marks regarding deliverability of the site (noise, bad neighbour uses) given it was a former employment site allocation, which is now being promoted for residential at a late stage in the process, and its location within the buffer zone directly adjacent to the existing rail line and directly adjacent to land safeguarded for Rugby Parkway station.	Potentially remove
316	Long Lawford	Land at Long Lawford	400	Green Belt site – No up to date Green Belt Assessment. Exceptional Circumstances not established. Site boundary (across open fields) would not achieve a defensible boundary, contrary to national policy.	Remove
6	Stretton-on-Dunmore	Fosse Way	3	Green Belt site – No up to date Green Belt Assessment. Exceptional Circumstances not established, contrary to national policy.	Remove
81	Stretton-on-Dunmore	Land West of Fosse Way	40	Green Belt site – No up to date Green Belt Assessment. Exceptional Circumstances not established, contrary to national policy.	Remove
134	Stretton-on-Dunmore	Land north of Plott Lane	125	Green Belt site – No up to date Green Belt Assessment. Exceptional Circumstances not established, contrary to national policy. Also, potential access constraints (ransom strip) if access cannot be secured via existing local plan allocation.	Remove
337	Brinklow	West Farm and Home Farm	75	Part previously-developed land (PDL), part greenfield	Retain

315	Brinklow	Land south of Rugby Road	340	Green Belt site - No up to date Green Belt Assessment. Exceptional Circumstances not established, contrary to national policy. Potential harm to adjacent conservation area (Brinklow), ecology issues	Remove
84	Wolvey	Land south off Leicester Road	60	Green Belt site - No up to date Green Belt Assessment. Exceptional Circumstances not established, contrary to national policy. Potential access constraints (access required via adjacent housing development)	Remove
96	Wolvey	Land at Coventry Road	500	Green Belt site – Significant extension into the countryside. No up to date Green Belt Assessment. Exceptional Circumstances not established, contrary to national policy.	Remove
309	Wolvey	Land north of B4109	150	Green Belt site – Significant extension into the countryside. No up to date Green Belt Assessment. Exceptional Circumstances not established, contrary to national policy.	Remove
Total			1,948		

Source: Stage 2 Site Assessment Report, March 2025

- 5.3 In conclusion, we contend that proposed allocations amounting to around 2,000 dwellings should be removed from the Plan. This is because of both strategic (mainly Green Belt) and site-specific considerations (notably access constraints, ecology, bad neighbour uses) which, in our view, render the sites inappropriate for their intended use for housing.
- 5.4 Nonetheless, our principal objections to the proposed allocation of the majority of these sites clearly relates to residential Green Belt considerations. As we have highlighted, the Council has yet to prepare and publish an up to date Green Belt Review, in accordance with national policy in the NPPF 2024. Any attempt to issue such a review following the publication of the preferred options is at grave risk of merely ‘post-rationalisation’ of the selected sites.
- 5.5 These risks are further evident given that removal of any Green Belt land is unnecessary to deliver the housing needs of the district, a factor accepted by the Council. Furthermore, there is a reasonable alternative available for meeting those needs on non-Green Belt land, notably at Lodge Farm.

6 SUSTAINABILITY APPRAISAL

- 6.1 National policy makes clear that local plans should be informed throughout their preparation by a sustainability appraisal (SA) that meets the relevant legal requirements²¹. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives, in light of reasonable alternatives. This is important because if the Local Plan is to be soundly-based it must be a justified and appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence (NPPF, para 36).
- 6.2 The Council has issued the next iteration of SA, titled '*Interim SA Report, March 2025*' (ISA). This follows on from the SA Scoping Report published at the Issues and Options consultation stage. The ISA seeks to explain the reasons for selecting the alternatives dealt with (Defining Growth Scenarios, chapter 5), present an appraisal of the reasonable alternatives (Growth Scenario Appraisal, chapter 6), and explain the Council's reasons for selecting the preferred option (The Preferred Approach, chapter 7).
- 6.3 We have reviewed the ISA and our responses in respect of the site are set out in the commentary below.

Defining Growth Scenarios

- 6.4 Chapter 5 of the ISA seeks to explain the process that led to the definition of the reasonable growth scenarios (para 5.1.1).

Quantum

- 6.5 In terms of the scale of housing to be planned for, the ISA states:
- "a high level case for remaining open to the possibility of higher growth scenarios, subject to consideration of supply options.... This high level case primarily relates to affordable housing need."* (para 5.2.29)
- 6.6 We agree that the Council should consider housing growth 'over and above' the minimum need based on the standard method (currently 618 dpa) in order to help increasing delivery of affordable housing as well as support economic aspirations, and accord with national policy²². However, the ISA has not considered the implications of any growth scenarios that look ahead to 2050 (26 years from the base date in 2024), which was identified as a possible time frame at the issues and options

²¹ Such 'relevant' legal requirements refers to Strategic Environmental Assessment, which is defined as a procedure (set out in the *Environmental Assessment of Plans and Programmes Regulations 2004*) which requires the formal environmental assessment of certain plans and programmes (including Local Plans) which are likely to have significant effects on the environment (see definition in the NPPF Glossary)

²² NPPF 2024, paragraph 69

consultation stage. Neither the Local Plan nor the ISA offer any clear reason as to why it would not be appropriate for the plan period to look ahead to 2050.

6.7 Furthermore, the ISA acknowledges that recent housing delivery has exceeded 1,000 dwellings per year (we have shown an average of 965 dwellings has been achieved since 2018 in the borough, and 688 dpa since 2011). However, no growth options have been appraised which reflect recent trends in delivery.

6.8 In this context, we contend that further reasonable growth alternatives plainly exist and these should be considered through the SA process. These are summarised below.

Table 6-1 Additional housing growth (quantum) scenarios

Scenarios	21-year period (to 2045)	26-year period (to 2050)
'Housing Delivery-led (2018-2024)' (965 dpa)	20,265	25,090
Housing Delivery-led (2011-2024)' (688 dpa)	n/a	17,888
Minimum need under standard method (618 dpa)	n/a	16,068

Broad Spatial Strategy

6.9 The ISA provides a brief discussion on the need for a 'balanced' strategy (starting at para 5.2.44). What is meant by this is not made clear, but we assume this relates to issues surrounding the potential distribution of growth across the borough.

6.10 At this point, the ISA highlights the need to account for a very high level of committed growth (including recent growth), particularly from a delivery perspective, while also accounting for the impacts of growth on local communities in Rugby town (para 5.2.46). Similar factors relating to 'minimising concerns around delivering on infrastructure alongside affordable housing' at the existing strategic sites (para 5.2.58) are also identified. We agree these issues exist and provide a clear justification for limiting further growth at the town.

6.11 However, the ISA pays scant regard to how similar issues are likely to impact, disproportionately, on rural communities in particular those living in the main rural settlements (we have shown this amount to over 1,700 dwellings at the Green Belt settlements alone). Whilst the ISA (para 5.2.65) refers to 'transport infrastructure capacity' issues, including village-specific considerations i.e. problematic junctions, village centre traffic and in-combination impacts along certain road corridors, no specific evidence has been considered at this stage regarding the likely significance of impacts resulting from significant levels of growth (above existing allocations) on those rural settlements and their communities. We contend that any such impacts are likely to be significant.

- 6.12 Furthermore, the ISA highlights education as a key issue in terms of aligning infrastructure and growth, in particular secondary school provision in north of Rugby town, and rural primary schools (para 5.2.59-5.2.64). As we have highlighted in our responses to draft Policy S2, the Council has provided scant evidence regarding the issues around primary school capacity in the rural area. This is particularly important given the draft spatial strategy is predicated on significant release of further Green Belt land for housing at a number of rural settlements, and the need for exceptional circumstances to justify it.
- 6.13 Taken together, without a clear understanding of the potential impacts on rural communities or a clear and deliverable strategy which addresses future school provision in rural areas it is, in our view, premature to allocate a large proportion of new housing allocation at the rural settlements.

Settlement scenarios and site options

- 6.14 Section 5.4 of the ISA provides a commentary on the development opportunities at the various settlements and smaller villages, and potential new settlements – the only one being at Lodge Farm – as well as a commentary on a ‘shortlist’ of specific site options drawn from earlier work in the Housing and Employment Land Availability assessment (HELAA) and Stage 2 Site Assessment, outlined in section 5.3 (para 5.3.9). According to the Council, this work has then informed the reasonable growth scenarios identified in section 5.5. The Council accepts that this process has involved ‘*an extensive application of discretion and planning judgment*’ used to inform the choices (para 5.4.4). We have reviewed the information provided on the scenarios and site options considered in the ISA and set out our responses below.
- 6.15 A key problem with the ISA is that from the outset there is no appraisal any individual residential site options against the SA Objectives prior to selecting the preferred option; this includes no appraisal of the Lodge Farm site. Paragraph 4.1.6 of the ISA attempts to justify this approach, which states:

“What about site options?”

4.1.6. Whilst individual site options generate a high degree of interest, they are not RAs [reasonable alternatives] in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case and is not the case here. Rather, the objective is to allocate a package of sites to meet needs and wider objectives, hence RAs must be in the form of alternative packages of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios (Sections 5.3 and 5.4), i.e. as a means to an end.”
(RPS emphasis)

- 6.16 The ISA is suggesting that individual residential sites put forward by site promoters and other parties, at the Council’s request through the Call for Sites process²³, ‘are not reasonable alternatives’ for ‘most local plans’. This is clearly illogical, given that consideration of site allocations is predicated

²³ Paragraph: 012 Reference ID: 3-012-20190722 Revision date: 22 07 2019

on site submissions through the 'call for sites' process and is not based on requests for a 'package' of sites. Such an approach would also contradict virtually every other local plan that has ever been adopted, where specific sites have been identified and allocated to meet the development needs of their areas. To suggest that individual sites do not constitute reasonable alternatives is erroneous and unfounded. There is no justification that such an approach is appropriate for this local plan. The approach appears to be an attempt to side-step an important and necessary step in the process of allocating appropriate sites for residential development in the Plan.

- 6.17 The appraisal of individual site options is a key requirement of the plan-making process as well as 'relevant legislation' (SEA regulations) on appraising the effects of plans that has been overlooked. This error represents a major gap in the SA process necessary to ensure that reasonable (site) alternatives have been appraised on a fair and consistent basis. If not remedied, the whole basis of the SA in relation to site appraisal for potential residential allocations is fundamentally flawed and RPS would be making the reference throughout the Examination stage, with reference to very well-trodden Case Law.
- 6.18 Taken together, the appraisal of sites has not followed a consistent and transparent process and is fundamentally and legally flawed. This undermines the credibility of the SA process as a whole.

Reasonable Growth Options – for Housing

- 6.19 Section 5.5 of the ISA defines the 'reasonable alternative residential growth scenarios'. These are first presented as 'settlement growth scenarios' set out in Table 5.1 of the ISA, which the ISA says is based on the preceding exercise which considered each settlement and the various site options. The table shows that, with the exception of Binley Woods, all main rural settlements are included within each growth scenario, to a greater or lesser extent (in terms of quantum). This is confirmed in Table 5.2 of the ISA, which describes the five growth scenarios for housing taken forward to the appraisal stage. The five 'reasonable alternative growth scenarios for housing' are listed below:
- Growth scenario 1 – the preferred option (PO) = 14,134 homes supply
 - Growth scenario 2 – the PO minus select sites plus NW Rugby = 14,054 homes supply
 - Growth scenario 3 – the PO minus select sites plus Lodge Farm = 14,054 homes supply
 - Growth scenario 4 – the PO plus NW Rugby = 15,934 homes supply
 - Growth scenario 5 – the PO plus Lodge Farm = 15,934 homes supply
- 6.20 Whilst the ISA defines these as 'growth scenarios' they are, in reality, simply groupings (or 'packages') of individual site options presented in different combinations. We acknowledge that Lodge Farm has been taken forward at this stage (in scenarios 3 and 5), which we support. Nonetheless, the alternative housing growth scenarios identified here include the Council's 'preferred option' for the distribution of housing (Scenario 1). However, it is unclear where or how the 'emerging preferred option (PO)' in scenario 1 has been derived or how this preference has been informed by an earlier stage of SA. This is largely because the ISA has not undertaken any site

specific appraisals, and so it is unclear what audit trail has been followed to get to this point. Such an approach is contrary to the need for the appraisal to follow an 'iterative' process so that the SA can properly inform the development and appraisal of options. This is another major legal flaw in the SA process.

- 6.21 Similarly, it is evident that a number of main rural settlements and villages have been identified in all five scenarios (this includes Brinklow, Clifton-upon-Dunsmore, Dunchurch, Ryton-on-Dunsmore, Stretton-on-Dunsmore, Wolvey, and Wolston) however Lodge Farm is only considered in two scenarios. This is because the ISA has identified certain settlements as 'constant'. This is significant because, according to the ISA allocations (see para 6.1.3) these sites have not been included in the appraisal of the scenarios but are included in the appraisal of the draft Plan (set out later in chapter 8 of the ISA). Other sites and locations, notably the 'new settlement' option at Lodge Farm has been classed as a 'variable' site allocation option, therefore it is only included in selected scenarios. Such an approach is arbitrary in nature and results in an unbalanced assessment where sites are not assessed on a consistent basis. This was a matter highlighted in case law in the *Heard* judgment²⁴.
- 6.22 The ISA does not explain why this has been done, or what value it adds to the SA process. Such a 'distinction' is unjustified and should be discounted from the SA of site options. This is yet another major flaw in the SA process.
- 6.23 We suggest that the SA should, at this (early) stage, identify growth scenarios that exclude the heavy reliance on rural settlements and sites, given the potential issues regarding the need to establish exceptional circumstances of the release of Green Belt sites (which in our view has not been established for meeting the housing requirement). This would help ensure the scenario testing is also based on 'sufficiently distinct' options that allow for a meaningful comparison of the effects of potentially different strategies, which is the key role of SA in plan-making, in accordance with national guidance²⁵.
- 6.24 Taken together, we contend that the process by which the reasonable alternative growth scenarios for housing have been defined to date is not robust or adequate. The scenario identification process should be revisited as part of the next 'iteration' of the SA.

Growth Scenario appraisal

- 6.25 Chapter 6 of the ISA then provides a commentary on the appraisal of the five housing growth scenarios.
- 6.26 Paragraph 6.1.2 of the ISA describes the 'methodology' used carry out the appraisal, based on a 'ranking' of scenarios 'in order of performance', and then categorising the performance in terms of

²⁴ *Heard v Broadland DC* [2012] EWHC 344 (Admin) (24 February 2012) (para 71)

²⁵ Paragraph: 018 Reference ID: 11-018-20140306 Revision date: 06 03 2014

'significant effects' based on a 'RAG' rating system, from 'significant negative' (red), to 'significant positive' effects (green).

- 6.27 At the broad level, the ISA doesn't present any detail of the appraisal process followed; it simply provides a written commentary on the opportunities of each site/settlement, rather than based on a systematic appraisal of options against the objectives. It is unclear how the various scores for 'significance' or 'performance' for each growth scenario have been derived.
- 6.28 In addition, the use of a 'performance' measure does not form part the SA Framework presented in the SA Scoping Report or in Table 3.1 of the ISA, which identifies changes made to the SA Framework following the Issues and Options consultation. Consequently, the use of performance here is an arbitrary addition to the SA process and does not, in our view, add any value to the SA process as a whole.
- 6.29 Table 6.1 of the ISA provides a summary of the scenario appraisal. The appraisal scores Scenario 3 (which includes Lodge Farm) as 'significant negative' effects in terms of the 'accessibility' objective, and Scenario 5 (which also includes Lodge Farm) as 'significantly negative' against 'transport'. Given the problems highlighted above, we do not agree with the findings applicable to the Lodge Farm site.

Accessibility

- 6.30 Under 'Accessibility', the ISA (para 6.2.8) says that a clear issue is that a secondary school here would do little if anything to address the current capacity shortfall affecting the north of Rugby. However, there is considerable uncertainty regarding education issues in Rugby, in particular whether a new secondary school as proposed in the Local Plan can be secured. Furthermore, the emerging proposals for Lodge Farm include the provision for new education facilities, along with potential to support transportation of children from the development to schools elsewhere in the borough.
- 6.31 It is also worth noting that the updated SA objective (Table 3.1 of the ISA) does not specifically refer to school provision in the north of Rugby.
- 6.32 On this basis, the assessment of Lodge Farm under the Accessibility objective is without merit and should be revised.

Landscape

- 6.33 Under 'landscape townscape', the ISA says (para 6.2.48) that overall the site has been assessed as having "medium" sensitivity. Attached at **Appendix 2** is a Landscape Technical Note, prepared by Define. In conclusion, the Note recognises that (as it is one of the largest sites under consideration) various specific measures would be 'designed-in' to the proposals for residential development at the site, in a way that would not be guaranteed by other development options considered in the Council's landscape sensitivity evidence. With this in mind, some of the judgements reached in the Council's evidence for the site are, in our opinion, overstated and a

more appropriate judgment for the site's overall sensitivity to residential development would be Medium/Low and not Medium, as is presently the case.

Transport

- 6.34 Under 'transport', the ISA says (para 6.2.55-6.2.56) the key issue for Lodge Farm is potentially around traffic affecting the area including Dunchurch (A426/B4429) in the context of recent, committed and future growth, and that this provides support for Scenario 1 (the 'preferred option'). This is questionable given the proposed allocation of 240 dwellings at Dunchurch under draft Policy S6, which is likely to increase traffic on the local road network. In addition, the emerging proposals for Lodge Farm includes measures to promote sustainable travel options, as well as enhanced connections to the local transport network for walking and cycling users, and potential to support new / enhanced public transport services. These emerging proposals (explained in the supporting vision document, **Appendix 1**) has been ignored in the appraisal.
- 6.35 On this basis, the assessment of Lodge Farm under the Transport objective is also without merit and should be revised. Attached at **Appendix 3** is an accessibility statement .which concludes that any concerns relating to network/traffic capacity, feasibility of securing a step change in mobility improvements including public transport, active travel accessibility, and safe crossing of the A45, can all be addressed in a sustainable, policy-compliant manner. This includes concerns around traffic capacity, congestion, and safety issues suggested at Dunchurch.
- 6.36 Taken together, the appraisal of the housing growth scenarios on the matters highlighted above lacks sufficient detail and is not robust. It should be revisited as part of the next iteration of the SA.

The Preferred approach

- 6.37 Chapter 7 of the ISA (para 7.1.3) confirms the preference for scenario 1, for which the Council says there is 'clear support' based on the appraisal. It is worth highlighting that this section of the ISA has been drafted by RBC officers, and not the appointed assessors (AECOM). This must raise concerns regarding the credibility of the approach and the stated position on the emerging preferred strategy.
- 6.38 In this context, it is worth noting, the preparation of sustainability appraisals is a process based on 'evaluative assessment' on the likely significance of effects of the Plan, a matter established in case law²⁶. This includes demonstrating how the SA process has been taken into account in preparing the new spatial strategy and distribution of growth (in accordance with Regulation 16 of the SEA Regulations). However, it is clear from the ISA that the preferred option / scenario 1 choice remains unchanged following the scenario appraisal exercise. It remains unclear how the ISA has informed the choice of preferred strategy.
- 6.39 Furthermore, in taking forward Scenario 1 as the preferred strategy option, the ISA does not clearly state the reasons for rejecting other scenarios, notably Scenario 3 and 5 which include the Lodge

²⁶ Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government [2014] EWHC 406 (Admin) (21 February 2014) (para 91)

Farm site. This is a requirement in national guidance²⁷, the 'relevant' legislation', and case law on rejecting alternatives²⁸. The lack of sufficient detail on selection and rejection of alternatives undermines the transparency of the SA process, and significantly undermines the purpose and credibility of the SA process.

- 6.40 Based on our assessment, the ISA has not adequately informed the preferred approach and is not soundly-based.

Draft Plan Appraisal

- 6.41 Chapter 9 of the ISA presents an appraisal of the Draft Local Plan (emerging preferred strategy for housing under Scenario 1). The ISA says that the appraisal is '*light touch*' in the knowledge that further work can be undertaken post consultation (para 9.1.3). We note that the Lodge Farm site has been (wrongly) discounted as part of the Local Plan consultation.
- 6.42 Nevertheless, before the significance of effects of the Plan can be determined, the SA will need to take into account new evidence as it emerges. This is important because a number of up to date evidence documents that will impact on the emerging preferred strategy have not yet been published; these include the Green Belt and Strategic Transport Assessments, as well as the Whole Plan Viability Assessment.
- 6.43 Given the ISA constitutes a 'light touch' appraisal, and in light to the issues and concerns we have identified with the ISA process followed thus far, it is not credible to conclude at this point that "*The appraisal does not predict any significant negative effects*" (ISA, para 9.2.57). It remains to be confirmed what the significant effects of the 'dispersed strategy' are likely to be, and how these will be addressed in the final Plan.
- 6.44 Consequently, the next iteration of SA will need to ensure that all relevant evidence is properly taken into account in order to demonstrate the final plan strategy is justified and appropriate and supports the achievement of sustainable development.

²⁷ Paragraph: 038 Reference ID: 11-038-20190722 Revision date: 22 07 2019

²⁸ Addressed in *Save Historic Newmarket Ltd v Forest Heath DC* [2011] EWHC 606 (Admin) (25 March 2011) (para 40)

7 LODGE FARM PROPOSALS

- 7.1 This section of our representations provides an updated position on the emerging masterplan for the Lodge Farm site (site 73).
- 7.2 A promotion of a smaller site was taken through the Rugby Local Plan 2011-31 process. St Modwen are now promoting a larger-scale, comprehensive masterplan in order to deliver greater sustainability outcomes for the development and the new community. Further details are provided in an updated Vision Document and associated supporting technical work appended to this submission (**Appendix 1**), which was previously submitted through an earlier call for sites exercise.

Overall proposals and masterplan

- 7.3 St Modwen has been developing a masterplan for the Site, based on a new residential-led, mixed-use community with associated supporting uses and infrastructure. The development, when completed, would deliver around 2,680 dwellings. This will also include a policy-compliant affordable housing contribution through delivery of affordable homes on-site.
- 7.4 An indicative land use mix comprising the Lodge Farm masterplan is summarised below, taken from Figure 19 of the Vision Document:
- Site total c 256 ha
 - Public Open Space /GI: 166 ha
 - Residential – c. 67 ha
 - Education (Primary): 4 ha
 - Education (Secondary): 10 ha
 - Garden Village Centre (retail/commercial/community): 2 ha
 - Mixed use Innovation Centre (employment): 4 ha
 - Southern Neighbourhood Hub: 0.6 ha
 - Primary Movement Route: c 3. ha
- 7.5 Proposals include provision of new public transport facilities and services to ensure access to non-car modes for new residents and workers. Proposals also include a wide range of new community and health facilities for new residents accessibly located within the development. This includes the increased provision of new housing, amenities and infrastructure on the site (for new and existing residents from the wider area) which results in not only higher levels of internalised trips, but also the potential to deliver upgraded cycling infrastructure via existing public rights of way (see section 4.4 of the Vision Document). This can help ensure that development is of a scale that can support proposed facilities and trip internalisation.

Technical Matters

- 7.6 The Council has raised a number of issues in the consultation material, which have informed their decision to discount the site at this stage. They focus on four main issues: transport, landscape, education, and deliverability.

Transport

- 7.7 The Council highlights the A426 / B4429 junction in the centre of Dunchurch as a 'key issue' which counts against focusing growth at Lodge Farm. As part of our response at the issues and options stage, we submitted a Public Transport Summary Note, which identified a number of options for addressing the public transport opportunities to help increase public transport accessibility to the site and to nearby settlements. The note also highlighted the potential benefits from 'internalisation' and containment potential from developing a new settlement. These are factors which point to the potential for reducing pressure on existing road network, including around Dunchurch. In addition, a Transport Note was also submitted, which highlighted the Rugby South West Link Road which could significantly relieve the transport issues at Dunchurch.
- 7.8 On a micro scale, concerns around traffic capacity and congestion at Dunchurch crossroads can also be diluted following physical improvements the junction and the certainty of a bypass to the village funded by development at SW Rugby.
- 7.9 However it appears these factors have largely been ignored, in the Council's assessment of the Site and the ISA, but which serve to support the potential for development to accommodate appropriate transport and highway measures at Lodge Farm.

Vision-led approach

- 7.10 The emerging proposals for the site are underpinned by a 'vision-led' approach to developing and appraising the transport implications of large-scale development, in accordance with national policy²⁹. This approach has been used to assess how different combinations of interventions will influence the way people move, drawing on evidence-based data, and which informs the emerging masterplan design.
- 7.11 Notably, the Transport Technical Note shows that the revised traffic forecasts using the Vision-led Planning Tool demonstrates 60% less traffic compared to the Council's own traffic forecasts within the strategic traffic model, despite a larger scheme through appropriate design and placemaking and the proposed mobility interventions. This is a significant benefit of development on this site and aligns perfectly to the Vision and Validate philosophy within the NPPF.

Future character and function of the A45

- 7.12 The illustrative Masterplan now sets out a greater critical mass of development on the site than previously proposed within the Local Plan, importantly showing development on both sides of the

²⁹ NPPF 2024, para 109

A45. The point of active travel connections between both sides of the site and treatment, character and crossing of the A45 will be an important element of detail and any future information submitted in support of this site will need to detail how this interface with the A45 (and its change in nature) will work in practice.

- 7.13 The development would provide pedestrian connections to the existing footways on the A45, allowing access on foot to Dunchurch some 2.3km from the edge of the site.
- 7.14 In relation to internal connectivity, new access junctions and downgrading of the character and speed of the A45 local to this site will provide the opportunity to ensure that at grade pedestrian/cycle crossings are of human scale.
- 7.15 The current masterplan prepared in response to comments made by the Inspector, proposes vehicular access both north and south of the A45 via signal control (crossroads or staggered), again changing the character of the A45 at this location.
- 7.16 The current speed limit of the A45 carriageway is 50mph and within the proposal site, this relatively short section of A45 would operate within, or below 30mph with appropriate speed / village gateway features (gateway signing, planters, chevrons, no centreline etc) on the northbound and southbound carriageway.
- 7.17 Clear opportunity to incorporate A45 as part of the development, connected to mobility hub, with potential improved public transport connections along the A45 to Rugby to the north and Daventry to the south.
- 7.18 These, and other measures, will help to reduce the perception of severance caused by the A45.

Landscape

- 7.19 An updated Landscape Note has been prepared which responds to the findings of the Landscape Sensitivity Assessment (LSA) on the Site, which provides an alternative landscape sensitivity assessment on the site and provides advice on how landscape considerations can be accommodated as part of the overall masterplan. The updated note is appended to this submission (**Appendix 2**) and concludes the site should be judged as 'medium/low' sensitivity for residential development. Furthermore, as the note concludes, the Council's evidence fails to take into account the landscape mitigation designed into the Lodge Farm proposals, which coincidentally is less likely to be achievable on the alternative smaller sites which have been proposed as draft allocations. When the mitigation is accounted for, the landscape impact arising from the Lodge Farm proposals would be less significant than on 2 of the sites proposed as draft allocations and equivalent to the harm arising from 13 other sites included as draft allocations.
- 7.20 We maintain our view that landscape considerations do not preclude the allocation of the Site as a new settlement in the Local Plan.

Education

- 7.21 The emerging masterplan makes provision for new primary and secondary school facilities to support the new homes on the Site. This would also go a significant way towards addressing the education issues in the borough, providing additional capacity in the south of the borough on-site and / or potentially through measures to transport students to existing facilities elsewhere so they can access education.
- 7.22 An Education Note has been prepared and is appended to this submission (**Appendix 4**), which addresses these points.

Other technical factors

Drainage

- 7.23 The site is located predominantly within Flood Zone 1 (fluvial). Part of the north-west of the site lies within Flood Zone 2 and 3. Therefore, this portion of the site will remain clear of development, forming part of the wider green and blue infrastructure for the site. There are no drainage reasons that would preclude allocation of Lodge Farm. Surface water drainage is recognised to be a low constraint in the Council's Stage 2 Site Assessment Report. While foul water drainage is identified as 'high' risk, this a programme issue, and not an absolute constraint on development.
- 7.24 We would also make the point that the 'high' constraint for foul is the case for all the preferred option proposed allocation sites of larger than 150 dwellings where assessed, and so should not be used as a reason to specifically exclude the Lodge Farm site from consideration at this stage.

Deliverability of the proposals

- 7.25 The Council has raised concerns in regard to potential deliverability issues of strategies that continue to rely of large-scale urban extensions to meet future housing needs in the borough. This is based on the progress being made in bringing forward a number of existing strategic sites in the borough (Houlton, South West Rugby).
- 7.26 However, as stated in our submission, these are factors impacting on the rate of delivery at Rugby town, but does not recognise that Lodge Farm is located outside Rugby and so not directly linked to the local housing market issues that are likely to impact on delivery in the town. The Council has assumed that Lodge Farm would be impacted by similar issues to those affecting sites at Rugby town, which we do not agree with.

Availability

- 7.27 As we have said in our call for sites submission, development would take place on a 'phased' basis and could commence in the short-term (within the next 5 years) subject to necessary approvals being secured. The Site has existing occupiers, but this will not preclude development as the occupiers are also the landowners who are promoting the Site.
- 7.28 The Site is available now.

Suitability

- 7.29 The Site is located in the countryside and outside the Green Belt. There are no site-specific designations that prevent the Site from being allocated through the Local Plan process for residential-led mixed-use development in this location.
- 7.30 The Site is suitable for its intended use.

Achievability

- 7.31 St. Modwen Homes are an expert master developer with over 30 years of property experience. St Modwen Homes will act as master developer and house builder, who intend on building out the site once planning permission is secured. We do not envisage any economic viability issues that would prevent the Site from coming forward for its intended use.
- 7.32 The vision illustrates how a high quality housing and landscape-led scheme would deliver an attractive development on the Site and which will enhance the local environment and draws out best practice design and place making, in order to deliver greater sustainability outcomes for the development and the new community.