

JPPC ref: DB/9238

Planning Policy
Rugby Borough Council
localplan@rugby.gov.uk

SUBMITTED VIA E-MAIL

7 May 2025

Dear Sir or Madam,

Rugby Borough Local Plan Preferred Options Consultation- March 2025
Proposed development at West Farm, Brinklow (337)

1. Thank you for the opportunity to comment on your Rugby Borough Local Plan- [REDACTED]
2. Our clients' land forms the bulk of the preferred site for allocation to provide 75 dwellings as ref. 337. We support this suggested allocation. Our clients' land is a sustainable and suitable development site and can contribute as part of a larger site with neighbouring land. The site offers particular benefit as a smaller allocation which should allow for swifter delivery than larger strategic sites.
3. This submission is made in two parts. Firstly, our response on the Local Plan Preferred Options at a high level, addressing strategic matters. This is set out in paragraphs 5-14. Comment directed specifically to the proposed allocation 337 at West Farm, Brinklow including our client's land follows (paras. 15-32).

Housing numbers

4. We welcome the Council's acknowledgement of the housing need identified through the standard method set out in the NPPF 2024 and the Plan's intention to meet this need. However, we are concerned that the strategy does not allocate sufficient land to deliver these homes, notwithstanding the buffer applied to NPPF figures.
5. The strategy for homes (S2) relies on a notable contribution from windfall sites to meet the objectively assessed need (50dpa). However, the Council's latest housing supply assessment shows this number of homes is not currently being delivered. In 2023-24 monitoring year delivered only 39 homes. Although the average for the period 2011-2024 is 49.4 this still falls short of the requirement in the proposed plan.

6. We do not consider it sound for the Local Plan to rely upon delivery of windfalls at a higher rate than currently and historically achieved in the borough. This is particularly so as the areas in which windfall development would be supported are reduced meaning, logically, the pool of potential development sites is reduced.
7. Dunchurch is no longer listed as a location in which windfall development is supported reducing potential windfall sites. There is no obvious change that creates opportunity for residential development where it is not currently allowed. Logically, with land in finite supply, opportunities in existing villages will diminish as suitable sites have been developed under the longstanding policy. Those sites that have not yet come forward cannot be relied upon to now come forward.
8. Noting the vulnerability of the windfall supply we believe additional land be allocated to meet the identified housing need in order that there is a clear and demonstrable supply of sites in the Local Plan. Any allocations should be expressed as minimum figures to allow for additional supply where appropriate.

Spatial strategy

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

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby"

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

West Farm, Brinklow (S6)

14. We support the Council's proposed allocation of land at West Farm, Brinklow for development. Brinklow benefits from a good range of services and facilities to support new households including shops, public houses, recreation ground, community centre, and an early year's primary school. These facilities are clustered around Broad Street that can be accessed directly via a public footpath from West Farm.
15. West Farm is proximate to the village centre and certainly sufficiently close that households located there can access the facilities on foot to sustain local facilities and maintain a vibrant community as aspired to by the NPPF. The proposed additional households (75) can help sustain facilities without (noting the ease of access on-foot) adding to parking pressure in the village centre.
16. We note the proposed allocation at West Farm is one of two suggested for Brinklow, the other being a much larger allocation for 340 dwellings. For the avoidance of doubt, we do not believe the proposed allocation at West Farm to be dependent on the larger site for delivery and can stand as an individual allocation. Indeed, smaller sites, as proposed at West Farm, can generally be delivered more swiftly than large strategic sites. It is sensible that West Farm is allocated as a standalone development (i.e. without any reliance on parallel delivery of site 315) in order that it can be progressed independently and required homes provided in the earlier part of the plan period.
17. The site is not considered to be subject to any constraints that would prevent allocation. We agree with your assessment that the site should be included as an allocation in the Local Plan, for the Council's benefit we provide comment on the main planning constraints below.

Green Belt

18. The Council has undertaken a thorough review confirming there to be an exceptional need for revision to Green Belt boundaries to meet development needs.
19. The position of the site in the Green Belt is a consequence of its sustainable location in the hinterland of major centres. Noting the strategic objectives of the Local Plan it is considered entirely appropriate to release land in the Green Belt to provide homes in a sustainable location, rather than treating the designation as a moratorium on development driving homes to locations that are less sustainable.
20. In the case of the proposed allocation at West Farm a large part of the site is developed featuring large buildings and hardstanding. The larger buildings have a clear association with the historic farm buildings (not in the Green Belt) and through this have legible connection with the village. The proximity of the village core and dwellings to the southwest of the proposed site that bookend the area mean its character is more of a settlement than outlying countryside.
21. Having regard to the definition in the NPPF (2024) the site is considered grey belt. The site's developed character, and its proximity to the main village facilities, is such that it is an area the NPPF prioritises for release from the Green Belt to meet development needs (para. 148).
22. The developed site is not proximate to a town or large built-up area, it cannot therefore make a contribution under criteria a, b, or d of NPPF paragraph 143. Designations in the vicinity of the site including heritage assets are acknowledged, however none are considered fundamental barriers to development that would prevent classification of the land as grey belt.

23. The Council have identified the need for development to revise Green Belt boundaries arises from an exceptional development need, in the presence of this need there is no reason to expect a suitably designed scheme to conflict with heritage policies of the NPPF, or any other relating to formal designations. No non-green belt designations should prevent the land being treated as grey belt.
24. The site's developed character and grey belt status mean it is an area the NPPF prioritises for release from the Green Belt to meet development needs (para. 148). The site is also well contained with defensible boundaries (the roads to the south and east, building to the west, and hedges and water bodies to the north) to prevent unplanned sprawl are required by NPPF paragraph 149.
25. The proximity to the village centre means key services and facilities should be accessible to new residents by sustainable means, particularly active travel, it is therefore an area supported for development by NPPF paragraphs 110 and 115.

Heritage

26. We agree with your site assessment that a development can be accommodated in compliance with policy that protects heritage assets around the site. The nearest heritage assets are the grade II listed buildings 5 and 7 Rugby Road to the southwest of the site, and the Scheduled Monument of the motte and bailey castle around 30m to the north.
27. There is no reason a sensitively designed development should not maintain the setting of these assets, considered against the large non-vernacular buildings that currently occupy much of the site there is scope for improvement.
28. The proposed development can accommodate traditional farm buildings in order that the historic use of the land remains legible (and as encouraged in HC3, Brinklow Neighbourhood Plan, 2022) and the setting of the conservation area maintained. Archaeological matters should not prevent development of the site, the works would be an opportunity for archaeology to be investigated and recorded.

Other matters

29. There are no other constraints that make the site unsuitable for allocation.
30. The land is not an area of flood risk and benefits from frontages to two roads from which vehicular access can be taken with existing footpaths offering routes to Broad Street for walkers. Ecology and all other matters can be suitably accommodated in a development's design to ensure expected amenity standards are achieved.
31. In short, we believe the site to provide a sustainable opportunity for development. As a smaller site the proposed allocation can deliver homes early in the plan period to contribute to the Borough's housing need and support vibrant village life.

Conclusion

32. We welcome proposals to encourage growth in Rugby Borough and the proactive stance the Councils are adopting in the allocation of new development sites. We also support the proposed spatial strategy of dispersal of development to settlements around the borough, we believe this essential to sustain rural populations, facilities, and communities. Furthermore, it is necessary to satisfy the NPPF requirement to support prosperous rural areas (paragraph 83) to ensure a sound plan.

33. We support the proposed allocation of our client's land at West Farm, Brinklow as part of the site 337. The allocation can contribute required homes to the borough and support the village. The land is sustainably located to encourage active travel with direct links to the key facilities of the village core.
34. The land is considered a grey belt site and so, combined with the sustainability of location, is identified as a more suitable location for development in the Green Belt under paragraph 148 of the NPPF to meet the exceptional need identified by the Council.
35. We are keen to work with the Council and relevant parties to progress this allocation. We trust this submission is of assistance and will be pleased to discuss further. Please do not hesitate to contact us should you have any questions or wish to discuss any matter.
36. We request that we are added to your consultation database in order that we can participate in further consultations and following examination of the Local Plan.

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