

[REDACTED]

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**From:** Mark Sullivan [REDACTED]  
**Sent:** 13 March 2026 17:03  
**To:** Local Plan  
**Subject:** Fw: Local Plan CPRE Representations  
**Attachments:** Rugby Local Plan CPRE Warks Rep Form Part A.docx; Rugby LP Part B CPRE Resp ANNEX Housing Allocs.odt; Rugby LP Part B CPRE Resp CL2 RENEWABLE ENERGY.odt; Rugby LP Part B CPRE Resp H2 AFFORDABLE HOUSIN.odt; Rugby LP Part B CPRE Resp I5 RAILWAY STATIONS.odt; Rugby LP Part B CPRE Resp S1 SETTLEMENT HIERARCHY.odt; Rugby LP Part B CPRE Resp S2 HOUSING STRATEGY.odt; Rugby LP Part B CPRE Resp S3 EMPLOYMENT LAND.odt; Rugby LP Part B CPRE Resp S5 GREEN BELT.odt; Rugby LP Part B CPRE Resp S6 RESIDENTIAL ALLOCATIONS.odt; Rugby LP Part B CPRE Resp STRATEGY SUMMARY p9-.odt

**Categories:** Hayley dealing with

Already sent to [Planning@rugby.gov.uk](mailto:Planning@rugby.gov.uk). Resending now to [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk)

Please find attached CPRE Warwickshire representations on Rugby Local Plan

M A Sullivan  
CPRE Warwickshire  
[REDACTED]

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**From:** Mark Sullivan  
**Sent:** 13 March 2026 16:58  
**To:** [REDACTED]; [planning@rugby.gov.uk](mailto:planning@rugby.gov.uk)  
**Subject:** Local Plann CPRE Representations  
Please find attached CPRE Warwickshire representations on Rugby Local Plan

M A Sullivan  
CPRE Warwickshire  
[REDACTED]

## Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

**Name of the Local Plan to which  
this representation relates:**

Rugby Borough Council Proposed  
Submission Local Plan

**Please return to Rugby Borough Council by 5:00pm Friday 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with **Proposed Submission Consultation**  
**in the subject line, OR by post to:** Development Strategy, Town Hall, Evreux  
Way, Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each  
representation you wish to make.

### Part A

#### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

#### 2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text" value="Campaign to Protect Rural England (CPRE)"/>	<input type="text"/>
Last Name	<input type="text" value="Warwickshire Branch"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="██████████"/>	<input type="text"/>
Line 2	<input type="text" value="██████████"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="██████████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>

E-mail Address  
(where relevant)

## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: CPRE Warwickshire

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph

Local Plan Policy

Policies Map

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

No

(2) is Sound

Yes

No

(3) complies with the  
Duty to co-operate

Yes

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

Yes

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To advance the case put in this representation and to respond to other parties who speak on the Policy.

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9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

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## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: CPRE Warwickshire

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	ANNEX Housing Allocations proposed in villages	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="text"/>
(3) complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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The Annex 'Development Site Allocations' includes the allocations proposed in rural settlements which are listed at Policy S6, right-hand column.

CPRE Warwickshire objects to the following allocations whose planned extent is shown in this Annex: (Site numbers listed)

Brandon 43  
 Brinklow 315, 337  
 Clifton on Dunsmore 129, 202, 307  
 Long Lawford 253, 316  
 Ryton on Dunsmore 100  
 Stretton on Dunsmore 6, 81, 348  
 Wolston 39, 136  
 Wolvey 309, 358

(Continue on a separate sheet /expand box if necessary)

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It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The above-listed proposed housing sites should be deleted from the Annex.

(Continue on a separate sheet /expand box if necessary)

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**No**, I do not wish to participate in hearing session(s)

Yes

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## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: CPRE Warwickshire

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	CL2 Renewable energy	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes		No	

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Policy CL2 Renewable Energy states

“C. Wind turbine development will, subject to compliance with other policies of this plan, be permitted within the areas shown as suitable on the policies map. Additionally, small or medium wind turbines will be permitted within Strategic Employment Sites and employment allocations.

D. Renewable energy proposals that would result in the loss of 20 or more hectares of best and most versatile agricultural land will only be permitted if the need for the development clearly outweighs the loss.

E. Energy storage infrastructure will be permitted where it is co-located with renewable energy development; or it alleviates grid constraints and contributes to delivery of renewable energy.”

Policy CL2 would permit loss of landscape character and agricultural land for little benefit.

The area shown on the Policies Map as suitable for wind turbines is the high plateau land north of Rugby where views are long and turbines would be very visible. The area identified around Churchover was the subject of applications for wind turbines in the 2010s which were refused following a call-in inquiry

by the Secretary of State. The reasons given for refusal then apply to any proposal for wind turbines in that area now. Similar open landscape extends north to Willey and High Cross.

The policy to protect agricultural land is weak. Areas of over 20 ha of BMV land are uncommon, and BMV land is usually mixed with Grade 3B land, often within the same field. The policy needs to protect Grade 3B agricultural land equally.

Energy storage infrastructure (BESS) should not be permitted on agricultural land. It is an industrial use and should be directed to industrial land, waste recycling depots, and landfill sites which cannot be used for large structures due to ground conditions and can accommodate the moveable BESS which are container size.

(Continue on a separate sheet /expand box if necessary)

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Amend Policy CL2 to limit development as indicated.  
Remove from the Policies Map the symbols indicating suitability for wind turbines in the Churchover, Willey, Newnham and High Cross area north and north of Rugby.

(Continue on a separate sheet /expand box if necessary)

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## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: CPRE Warwickshire

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	H2 Affordable housing	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes		No	

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Policy H2 affordable housing should not apply in existing villages. In the existing villages, provision of social rented housing to meet needs to those with a social connection to the rural area in which the village is located should be under Policy H4 Rural Exception Sites.

(Continue on a separate sheet /expand box if necessary)

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Add text to state that in existing villages, affordable housing should be delivered either on small infill sites within the village boundary or on rural exception sites under Policy H4.

(Continue on a separate sheet /expand box if necessary)

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## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: CPRE Warwickshire

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	I5	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
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The allocation for the 'proposed Nuneaton Parkway Station' should be deleted. There is no case for such a station and the current proposals for developing the Coventry-Leicester line do not involve such a station,. Better services at Nuneaton station and a north side access to the station are the right solution.

The 'Rugby Parkway' station is actually a station to serve Houlton, the developing urban area east of Rugby. The name should be changed to 'Houlton station'.

(Continue on a separate sheet /expand box if necessary)

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## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: CPRE Warwickshire

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S1 Settlement Hierarchy	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes		No	

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The Settlement Hierarchy Policy at S1(ii) states  
 “Main rural settlements of Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston and Wolvey will accommodate development allocated through this plan and through neighbourhood plans.”  
 This part of the policy is not justified and has not been compared with reasonable alternatives. For the reasons given in CPRE’s objection to the Strategy Summary (para 1.1-1.7) and Policy S2, S1(ii) should be removed and all rural settlements listed in S1(iii).  
 Para 1.17 should be deleted while para 1.16 is retained.  
 Para 1.18 states:  
 “It should be noted that the strategic employment allocations planned alongside Ansty Park and at Crouner Fields Farm/Home Farm, Ansty are at the edge of the Coventry urban area. These allocations effectively sit outside of the borough’s settlement hierarchy.”  
 These allocations conflict with the Green Belt and the settlement hierarchy.

(Continue on a separate sheet /expand box if necessary)

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S1(ii) should be removed and all rural settlements listed in S1(ii) added to the list in S1(iii).

(Continue on a separate sheet /expand box if necessary)

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## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: CPRE Warwickshire

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S2 Strategy for homes	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes		No	

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CPRE Warwickshire has the following objections to the Strategy for homes.

(1) There is an excessive number of new houses proposed in the Plan, above the housing ‘need’ that the MHCLG housing target for Rugby LPA has issued. Para 1.2 states that the requirement is 10,812 (17 years 2025-2042). There are permissions or allocations for 7,993. But there are to be allocations for 2,886 more, making the total supply for the Plan period 11,729, or 917 more than the policy requires. This excess is 55% of the proposed housing put in the rural settlements. There is no justification for over-allocation when any limit on supply will only occur, if ever, at the very end of the Plan period (after 2040). By then the Plan will have been subject to two reviews.

By itself, reducing the supply to the requirement enables removal of a majority of the allocations in rural villages. They can all be removed if a realistic annual windfall rate is used in the Plan. See (2).

(2) The windfall rate in the Plan is set at 50 p a (Para 1.23). This is an underestimate. Only windfalls of fewer than 5 houses are counted, when normal practice is to include up to 10-house sites in windfall projections. Some urban windfall sites in Rugby have been larger. Despite representations at the Reg.18 stage that the 50 p a windfall rate is low, it is used again. The Kells Report on the Reg.18 Plan to Brinklow Parish Council (April 2025, enclosed) sets out why

the windfall projection for the plan period to 2042 should be @2,000.

Changing the proposed housing supply figure to meet the requirement and changing the windfall projection in Policy S2 to a number that better reflects actual windfall rates will make the allocations to the rural settlements listed in Policy S1 and on the Key Diagram unjustified.

(Continue on a separate sheet /expand box if necessary)

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- In The S2 Table, amend the total stated supply in the plan period from 11,729 to 10,812 houses.
- Revise the entry for ‘Allocations under Policy S6’ to exclude the S6 Residential allocations at Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Newton, Ryton on Dunsmore, Stretton on Dunsmore, Wolston and Wolvey (the right hand column in the S6 Table at p17).
- Change the projection of windfalls from 850 to 2,000 and remove the ‘fewer than 5 homes’ limitation. Amend para 1.23 to reflect a wider approach to windfalls that is in line with national policy.

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: CPRE Warwickshire

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S3 Employment Land	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes		No	

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S3 proposes new employment development on Green Belt, at Crouner Fields Farm Ansty, Ansty Park North and Walsgrave Hill. The exceptional circumstances required have not been demonstrated to remove land from the Green Belt for such large developments.

The Fraser Group 'campus' development at Crouner Fields Farm north of the M6 has been granted planning permission but may or may not proceed. It may be that only a part of the permission will be taken up. The permission only applies to the Fraser Group application. The situation is similar to the Gigafactory permission granted on the land at Coventry Airport. That has not been used despite having been granted some 4 years ago. If it is not implemented the Green Belt status of the land remains. Unless and until the Fraser Group development is implemented the Green Belt status of the land should remain.

The proposed 290,000 sq m development at Walsgrave Hill would fill in the Green Belt between the A46 and Ansty Park with more employment development (Site 121, 201 ha and small extension Site 14). NPPF policies that protect the Green Belt provide a strong reason for preventing the Site 121 development because its size and damaging effect on the purposes of the Green Belt.

The earlier Reg.18 Rugby Local Plan (March 2025) did not include this proposed allocation. It proposed an extension of the Ryton-on-Dunsmore industrial location (which is between the A45 and the A423 west of Ryton village) to the southwest of the A423. With the Middlemarch Business Park to its west, this is a less harmful and preferable location if new employment land is essential.

If there is a need for employment land on the Coventry boundary the Reg.18 Plan location would have much less effect on the openness of the Green Belt than the Site 121 proposal and the small extension Site 14.

It appears from para 1.26 that only the small Site 14 is to be 'ring-fenced' for manufacturing and R&D. This indicates that the large Site 121 could be all or mostly B8 warehousing and distribution. That is not a need that justifies the exceptional circumstance of removing land from the Green Belt.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete Sites 121 and 14 and re-examine the Re4g.18 employment land site west of the A423.

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

Yes

**Yes**, I wish to participate in hearing session(s)

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## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: CPRE Warwickshire

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S5 Countryside Protection	Policies Map	Key Diagram – Green Belt
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes		No	

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Policy S5(B) states:

“The extent of the Green Belt in the borough is delineated on the policies map. National Green Belt policy will be applied in these areas.”

The Plan’s proposed spatial strategy allocates Green Belt land for development. This requires Green Belt boundaries to be altered. To change Green Belt boundaries it is necessary to demonstrate exceptional circumstances. The Summary of Green Belt Changes shows that the Plan proposes on what is now Green Belt:

- 12 proposed residential allocations
- 3 further sites associated with proposed residential sites
- 6 employment allocations, 3 being large

There is no explanation of how so many sites - 21 – are all justified on exceptional circumstances. The NPPF lists instances which could be exceptional, such as when a plan-making authority cannot meet identified needs through any other means. The needs identified can be met by other reasonable alternatives.

These Green Belt sites amount to a total of 386 ha of land proposed to be removed from the Green Belt. The cumulative damage to the Green Belt between Coventry and Rugby would be immense.

The claimed benefits of the proposed housing allocations in the Green Belt are:

- Affordable housing delivery;
- Village Sustainability;
- Diversifying and speeding up housing delivery.

Rugby has not been meeting its targets on affordable housing, mainly because viability claims have repeatedly been accepted as more important than the need for affordable housing. There is evidence of this on greenfield sites, both large and small.

It is claimed that greenfield sites at villages are best able to deliver affordable housing, on the ground that Green Belt villages have the highest property values and therefore the ability to deliver higher proportions of affordable housing as part of new housing development. There is no evidence to support the unproven causality asserted; even if there was, creating houses for sale in rural areas is not the right way to solve the problem of affordable housing.

Rugby makes many claims about the claimed sustainability benefits of development in Green Belt villages but fails to analyse the delivery of affordable houses within recent developments in rural villages. The sustainability claims are not supported by evidence. For example, it is claimed that diversification of sites will lead to opportunities for small builders. But sites in Green Belt villages released in the previous (adopted) plan are being developed by large housebuilders (Long Lawford, Stretton on Dunsmore).

There is no evidence that building new housing estates on what is now Green Belt on the edges of the main rural settlements will improve their sustainability. Expanding them would generate more traffic, increase car-dependence compared to locating the same amount of development in the Rugby urban area, and add cost to providing services.

The exceptional circumstances test has not been demonstrated for the removal of land from the Green Belt in the Local Plan.

(Continue on a separate sheet /expand box if necessary)

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Add to Policy S5 'Exceptional circumstances to changing Green Belt boundaries and removing land from the Green Belt in the borough have not been demonstrated.

(Continue on a separate sheet /expand box if necessary)

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Yes

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## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: CPRE Warwickshire

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S6 Residential Allocations	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes		No	

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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CPRE Warwickshire has the following objections to the Residential allocations policy

(1 ) The Local Plan’s Spatial Strategy is wrong. It proposes to increase development in villages and to do so take land out of the Green Belt. The existing Local Plan and previous Plans made the Rugby urban area the focus of development and did not support significant new development in villages. Para 1.7 calls this ‘diversifying the location and size of housing sites .... to better reflect the borough’s mix of town and rural locations’. The claim is made that this will secure more affordable housing, it appears by developers being wiling to build in villages because they achieve higher house prices, so can be required to supply a higher amount of ‘affordable housing’.

The Plan fails to justify how higher house prices can lead to more affordable housing. If the theory is that builders can make greater profits on ‘executive homes’ in the countryside to enable them to include so-called affordable housing, this theory has repeatedly failed in practice. The greatest need is for rented affordable housing rather than affordable home ownership.

People who rent housing are those who most need access on foot or by bus to

work, schools and shopping. They benefit from urban locations. Houses in villages do not meet these needs. Established village families who need rented housing should be served by rural housing association small sites where a local connection qualification is needed. Small rural rental housing developments have been successful in parts of Warwickshire. These are provided for in Policy H4 Rural Exception Sites.

New housing in villages would lead to increased travel from villages to larger urban centres and greater costs in providing social and medical services. (See Warwickshire CC response to Reg.18 Plan strategy.)

Despite the number of houses in greenfield allocations being (slightly) less than in the Reg.18 Draft Plan, there has not been a full analysis of alternatives to housing development at the villages which are insets in the Green Belt: Binley Woods, Brinklow, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston and Wolvey; in each case new housing would be added and land removed from the Green Belt. Clifton on Dunsmore (northeast of Rugby and not in the Green Belt) is proposed to have 150 more houses (see Policy S6); it cannot retain its village character so close to the town if any more housing is imposed on it.

There has not been an adequate assessment of reasonable alternatives to the strategy proposed despite strong objections to it at the Reg.18 stage.

(2 ) There is an excessive number of new houses proposed in the Plan, above the housing 'need' that the MHCLG housing target for Rugby LPA has issued. Para 1.2 states that the requirement is 10,812 (17 years 2025-2042). There are permissions or allocations for 7,993. But there are to be allocations for 2,886 more, making the total supply for the Plan period 11,729, or 917 more than the policy requires. This excess is 55% of the proposed housing put in the rural settlements. There is no justification for over-allocation when any limit on supply will only occur, if ever, at the very end of the Plan period (after 2040). By then the Plan will have been subject to two reviews. Reducing the supply to the requirement by itself enables removal of most of the rural village allocations.

By itself, reducing the supply to the requirement enables removal of a majority of the allocations in rural villages. They can all be removed if a realistic annual windfall rate is used in the Plan.

The S6 table of residential allocations should be amended to delete the allocations in the rural villages – the right-hand column. These are the allocations proposed at Binley Woods, Brinklow, Clifton on Dunsmore, Long Lawford, Newton, Ryton on Dunsmore, Stretton on Dunsmore, Wolston and Wolvey. This is a total of 1,648 houses.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- In The S2 Table, amend the total stated supply in the plan period from 11,729 to 10,812 houses.
- Revise the entry for ‘Allocations under Policy S6’ to exclude the S6 Residential allocations at Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Newton, Ryton on Dunsmore, Stretton on Dunsmore, Wolston and Wolvey (the right hand column in the S6 Table at p17).
- Change the projection of windfalls from 850 to 2,000 and remove the ‘fewer than 5 homes’ limitation. Amend para 1.23 to reflect a wider approach to windfalls that is in line with national policy.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

Yes

**Yes**, I wish to participate in hearing session(s)

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## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: CPRE Warwickshire

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	1.1-1.14	Local Plan Policy	Spatial Strategy	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	
(2) is Sound	Yes		No	<b>X</b>
(3) complies with the Duty to co-operate	Yes		No	

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

CPRE Warwickshire has two objections in principle to the housing element of the Spatial Strategy.

(1 ) The Local Plan’s Spatial Strategy is wrong. It proposes to increase development in villages and to do so take land out of the Green Belt. The existing Local Plan and previous Plans made the Rugby urban area the focus of development and did not support significant new development in villages. Para 1.7 calls this ‘diversifying the location and size of housing sites .... to better reflect the borough’s mix of town and rural locations’. The claim is made that this will secure more affordable housing, it appears by developers being wiling to build in villages because they achieve higher house prices, so can be required to supply a higher amount of ‘affordable housing’.

The Plan fails to justify how higher house prices can lead to more affordable housing. If the theory is that builders can make greater profits on ‘executive homes’ in the countryside to enable them to include so-called affordable housing, this theory has repeatedly failed in practice. The greatest need is for rented affordable housing rather than affordable home ownership.

People who rent housing are those who most need access on foot or by bus to work, schools and shopping. They benefit from urban locations. Houses in villages do not meet these needs. Established village families who need rented

housing should be served by rural housing association small sites (rural exception sites) where a local connection qualification is needed. Small rural rental and shared-ownership housing developments have been successful in parts of Warwickshire. These are provided for in Policy H4 Rural Exception Sites.

New housing in villages would lead to increased travel from villages to larger urban centres and greater costs in providing social and medical services. (See Warwickshire CC response to Reg.18 Plan strategy.)

Despite the number of houses in greenfield allocations being (slightly) less than in the Reg.18 Draft Plan, there has not been a full analysis of alternatives to housing development at the villages which are insets in the Green Belt: Binley Woods, Brinklow, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston and Wolvey; in each case new housing would be added and land removed from the Green Belt. Clifton on Dunsmore (northeast of Rugby and not in the Green Belt) is proposed to have 150 more houses (see Policy S6); it cannot retain its village character so close to the town if any more housing is imposed on it.

There has not been an adequate assessment of reasonable alternatives to the strategy proposed despite strong objections to it at the Reg.18 stage.

(2 ) There is an excessive number of new houses proposed in the Plan, above the housing 'need' that the MHCLG housing target for Rugby LPA has issued. Para 1.2 states that the requirement is 10,812 (17 years 2025-2042). There are permissions or allocations for 7,993. But there are to be allocations for 2,886 more, making the total supply for the Plan period 11,729, or 917 more than the policy requires. This excess is 55% of the proposed housing put in the rural settlements. There is no justification for over-allocation when any limit on supply will only occur, if ever, at the very end of the Plan period (after 2040). By then the Plan will have been subject to two reviews. Reducing the supply to the requirement by itself enables removal of most of the rural village allocations.

They can all be removed if a realistic annual windfall rate is used in the Plan. The windfall rate in the Plan is set at 50 p a (Para 1.23). This is an underestimate. Only windfalls of fewer than 5 houses are counted, when normal practice is to include up to 10-house sites in windfall projections. Some urban windfall sites in Rugby have been larger. Despite representations at the Reg.18 stage that the 50 p a rate will be too low, it is used again. The Kells Report on the Reg.18 Plan to Brinklow Parish Council (April 2025, enclosed) sets out why the windfall projection for the plan period to 2042 should be @2,000.

Changing the proposed housing supply figure to meet the requirement and changing the windfall projection in the Strategy for Homes (Policy S2) to a number that better reflects actual windfall rates will make the allocations to the rural settlements listed in Policy S1 and on the Key Diagram unjustified.

CPRE also has objections to the strategy for employment land outlined at paras 1.9-1.13. See CPRE Representation on Policy S3 Strategy for Employment Land for details.

(Continue on a separate sheet /expand box if necessary)

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- Amend the spatial strategy to remove the allocations at the villages listed at para 1.5 and at Policy S1(ii).
- Add the villages Binley Woods, Brinklow, Clifton on Dunsmore, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston and Wolvey to Policy S1(iii)
- In para 1.2 and 1.3, amend the stated requirement in the plan period from 11,729 to 10,812 houses
- Change the projection of windfalls from 850 to 2,000 and remove the 'fewer than 5 homes' limitation
- Revise paras 1.9-1.13 on employment land locations (See representation on Policy S3).

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Yes

**Yes**, I wish to participate in hearing session(s)

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