

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 13th March 2026
By email to: 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.*

Title

Miss

First Name

Louise

Last Name

Hinsley

Job Title

Associate

(where relevant)

Organisation

Cerda Planning

(where relevant)

Address Line 1

52 Lyndon Road

Line 2

Sutton Coldfield

Line 3

Line 4

Post Code

B73 6BS

Telephone Number

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:

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

Local Plan Paragraph		Local Plan Policy	S1, S2, S6, EN4, H1, H2, I1	Policies Map	
Site ID	129				

4. Do you consider the Local Plan:

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

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.

Please see enclosed representations

(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.

Please see enclosed representations.

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

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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.

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

To support the Inspector in assessing legal compliance and soundness.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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.

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:

<https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>



52 Lyndon Road
Sutton Coldfield
West Midlands B73 6BS

Development Strategy Team
Town Hall
Evreux Way
Rugby
CV21 2RR

26.180/LH
12 March 2026

By Email: localplan@rugby.gov.uk

Dear Planning Team

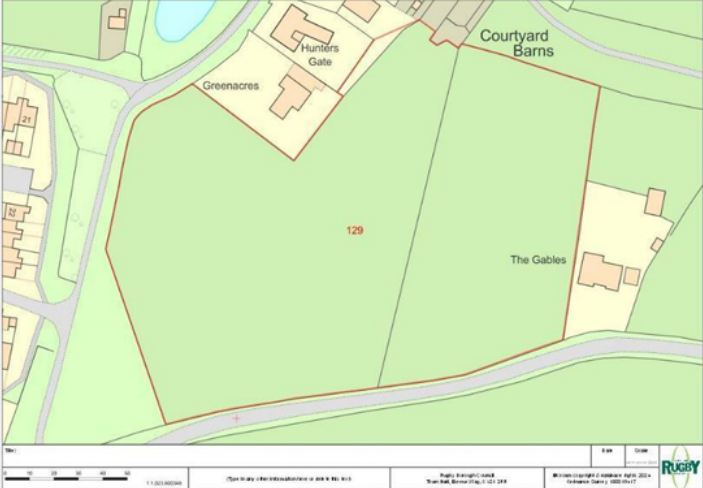
Representations to Rugby Borough Council Regulation 19 Draft Local Plan Consultation on behalf of Davidsons Homes and the landowners with regard to land at Lilbourne Road, Clifton Upon Dunsmore (ID 129)

Introduction

1. The submission has been prepared by Cerda Planning on behalf of Davidsons Homes in response to the Rugby Borough Council Local Plan Proposed Submission Regulation 19 Consultation to consider if the plan is sound, legally compliant and complies with the Duty to Co-operate.
2. Davidsons Homes are a private, local medium sized housebuilder delivering circa 900 homes per year across the East and South Midlands. They pride themselves on delivering high quality and well-designed homes. This can be seen with the 350 homes delivered by Davidsons at Houlton.
3. These representations are made by Davidsons Homes jointly alongside the landowners of the Land north of Lilbourne Road, Clifton upon Dunsmore which is draft allocated for 60 homes under emerging Policy S6 (ID.129)

Land north of Lilbourne Road, Clifton upon Dunsmore

4. Davidsons Homes has an interest in Land to the north of Lilbourne Road, Clifton Upon Dunsmore. The Site is situated directly to the east of the existing settlement edge of Clifton upon Dunsmore. The site is bound to the south by Lilbourne Road to the west by Buckwell Lane and a small triangular field, with an extant housing commitment. To the north are a collection of residential properties. Beyond the site to the west is the wider settlement and to the east agricultural fields. The site is situated on the northeastern boundary of, though not within, the Clifton upon Dunsmore Conservation Area. Within 200m of the site there are two Grade II Listed Buildings.
5. The site measures circa 2.31 hectares with the capacity to deliver circa 60 dwellings. An extract of the allocation is provided below.

Site ID: 129	Site name: Land north of Lilbourne Road, Clifton upon Dunsmore
Site area: 2.31ha	Allocation: circa 60 dwellings
Development requirements: <ul style="list-style-type: none"> • Landscape-led development that is aligned to local precedent, and housing design that draws from the conservation area character appraisal. • Retention of hedgerows which bound the site as far as possible, and additional screening to buffer the conservation area. • Pedestrian and bicycle footway to be constructed to link development site to existing network at junction of Buckwell Lane and Manor Lane. • Provision of a footway along Lilbourne Road. • Drop crossing required at proposed access and across Buckwell Lane to join to existing network. • Existing street lighting should be extended to cover site access. • Proposed access should be located away from the junction of Hillmorton Lane, Lilbourne Rd and Buckwell Lane whilst still providing the required visibility splays. • Traffic calming and speed gateway treatments to be improved and include proposed access. • Contribution towards delivery of Local Cycling and Walking Infrastructure Plan (LCWIP) Route 47 (park connector between Coton Park and Clifton upon Dunsmore) which connects to Rugby Station and the town centre. 	
	

6. Development would be landscape-led, seeking to retain and enhance the existing landscape structure, including trees and hedgerow boundaries. Opportunities exist for areas of public open space, and the creation of new recreational pedestrian and cycle links across the site and onto Buckwell Lane to connect with the existing bicycle network, as well as the inclusion of a footpath link provided up to the junction of Lilbourne Road / Buckwell Lane / Hillmorton Lane. There is also the potential to contribute towards the delivery of the Local Cycling and Walking Infrastructure Plan (LCWIP) Route 47 (park connector between Coton Park and Clifton upon Dunsmore) which connects to Rugby Station and town centre.
7. The site is under a single ownership, free of major infrastructure constraints, and a developer is in place. The developer is committed to bringing forward this site for development, having already engaged in pre-application discussions with the Local Planning Officers; technical work is being undertaken and being prepared to support an imminent planning application. There are limited physical constraints, none of which would affect the sites deliverability and viability.
8. The site is available now and capable of coming forward within the plan period, making a meaningful contribution to the Council's five-year housing land supply. The following timeline outlines a realistic and achievable delivery programme.
 - **Pre-Application Stage (Ongoing – Autumn 2026):**
Davidsons have begun pre-application discussions.
Technical reports and supporting documents are currently being prepared.
 - **Planning Application Submission (Autumn 2026):**
 - **Determination Period (Autumn 2026 – Spring 2027):**
Decision expected in **Spring 2027**.
 - **Development Commencement (Autumn 2027):**
Works anticipated to start in **Autumn 2027**.
Proposed build rate: **c. 40 dwellings per annum**.

- **First Occupations (Autumn 2028):**
Earliest completions/first occupations anticipated in **Autumn 2028**.
- **Full Completion (Autumn 2029):**
Entire development expected to be built out by **Autumn 2029**.

Plan Making Context

9. The Development Plan is at the centre of the planning system with a statutory requirement that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Development Plans are central to setting out the framework for future growth and development in an area, with regards to addressing housing, economic development, community needs, infrastructure as well as the natural environment.
10. The Framework reinforces this principle. Paragraph 15 states that the planning system should be plan led, with succinct and up-to-date plans providing a positive vision for the future, including a framework for meeting housing needs.
11. Paragraph 16 of the Framework sets out the principles for preparing local plans.
 - be prepared with the objective of contributing to the achievement of sustainable development
 - be prepared positively, in a way that is aspirational but deliverable.
 - be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
 - be accessible through the use of digital tools to assist public involvement and policy presentation; and
 - serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).
12. Paragraph 36 of the Framework explains that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedure requirements and whether they are sound. Plans are 'sound' if they are:
 - Positively prepared – providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and is based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in Framework and other statements of national planning policy, where relevant.
13. Footnote 20 – states that “where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 62 of the Framework.”

14. Paragraph 62 states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
15. Furthermore, the Framework advises on identifying land for homes, in particular Paragraph 72 advises on identifying sufficient land for housing including a mix of sites taking into account their availability, suitability and likely economic viability. “Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
 - specific, deliverable sites for five years following the intended date of adoption; and
 - specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.”
16. The Framework recognises (paragraph 73), “small and medium sized sites can make an important contribution to meeting the housing requirements for an area, are essential for and Medium Enterprise housebuilders to deliver new homes and are often built out relatively quickly.

UK Labour Government

17. In July 2024, the UK Labour Government announced an ambitious target to deliver 1.5 million new homes in England over the current five-year parliamentary term equating to over 300,000 homes per year. This represents a significant increase compared to previous delivery levels of around 221,000 net additional homes annually.
18. To achieve this, the Government has introduced a series of planning system reforms aimed at unlocking land, streamlining processes, and accelerating housing delivery. One of the first major steps came in December 2024, with amendments to the National Planning Policy Framework (NPPF), including the introduction of a ‘grey belt’ designation to release certain Green Belt sites and the reinstatement of mandatory housing targets for Local Plans.
19. On 16 December 2025, the draft NPPF 2025 consultation was published for consultation. The draft NPPF introduces significant reforms aimed at accelerating housing delivery and strengthening the plan-led system, including a requirement for local plans to be prepared and adopted within 30 months. These measures reflect the Government’s ambition to deliver 1.5 million homes over five years and addresses persistent housing shortages. The draft Framework, emphasises, sustainable growth, prioritising brownfield land and edge-of-urban sites, while ensuring plans remain positively prepared, justified and effective in meeting both local and strategic housing needs.
20. As part of streamlining the plan making process, the Government announced (November 2025) it will revoke Duty to Cooperate. It is anticipated that this will take effect sometime in 2026. The aim of revoking the Duty to Cooperate will prevent unnecessary delays to local plans during examination.
21. These changes to the planning system demonstrate that planning and economic growth are central to the Government’s agenda, with Development Plans positioned as the primary catalyst for delivering its housing objectives.

Regulation 19 Consultation Observations

22. The response to the Regulation 19 Consultation is submitted to assess whether the Local plan meets the criteria for soundness, to be legally compliant and complies with the Duty to co-operate. For a Local Plan to be deemed 'sound' it must satisfy the four tests outlined in Paragraph 36 of the Framework, which requires plans to be (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy.

Policy S1 Settlement Hierarchy

23. A positively prepared Local Plan must be supported by proportionate evidence and demonstrate that reasonable alternatives have been assessed to identify the most appropriate strategy. The Plan must align with the NPPF (December 2025) by enabling sustainable development and boosting housing supply. Paragraph 69 emphasises the importance of directing growth to sustainable and deliverable locations.
24. The proposed allocation at Site ID 129 sits on the edge of Clifton upon Dunsmore and aligns with the Plan's spatial strategy, which designates Clifton upon Dunsmore as a Main Rural Settlement capable of accommodating a proportionate level of growth. Directing development to the settlement edge accords with national policy, which supports locating new homes where they maintain or enhance the vitality of rural communities and integrate with established development patterns.
25. Clifton upon Dunsmore is appropriately categorised as a Main Rural Settlement due to its sustainable location, proximity to Rugby, and its position outside the Green Belt. The Sustainability Appraisal (SA) confirms the proposed submission approach, allocating three sites to the north of the village totalling 150 dwellings. The level of growth is capped due to primary school capacity and to minimise landscape and heritage impacts. The SA demonstrates that this represents the most sustainable spatial option.
26. The SA is considered legally compliant, having assessed reasonable alternatives within Clifton upon Dunsmore and discounted options that would result in greater landscape harm or exceed the settlement's infrastructure capacity.
27. The allocation reflects the settlement hierarchy's intention to focus growth in the most sustainable rural locations and avoid dispersal to smaller, less well-served settlements. Locating development on the settlement boundary ensures good connectivity to existing built form, local services and public transport, supporting sustainable travel patterns.
28. Given its alignment with the spatial strategy, the evidence base, and national policy, the principle of allocating Site ID 129 is sound. It is justified through proportionate assessment of settlement roles and alternatives, effective in contributing to balanced housing distribution, and consistent with national policy in supporting sustainable rural development. We therefore support its inclusion.
29. However, excluding Land to the north of Lilbourne Road contradicts the evidence-led approach. The site is adjacent to existing development, free from major constraints, and capable of early delivery. Paragraph 15 of the NPPF highlights the importance of plan-led growth to prevent speculative development in unsustainable locations. Given Rugby's lack of a five-year housing land supply, the risk of unplanned development increases. Allocating land north of Lilbourne Road would strengthen the Plan's soundness by ensuring controlled, sustainable housing delivery.

S2 Strategy for Homes

30. Rugby's 5-year housing land supply is 4.16 years as set out against the standard method requirement. However, we consider this number to be over ambitious especially with regards to the trajectory applied to the site at Houlton and whether the projections are correct.

R11/0699 – Remainder of Houlton Allocation

31. In the Council's Housing Land Supply Position Statement 2025-2030, the council state that *"At Houlton, the site is underway and progressing swiftly with numerous housebuilders on site. There have been rolling submissions of reserved matters for individual parcels within the defined key phases. Construction began at Houlton in the 2017-18 monitoring year. There have been completions in the past eight monitoring years from 2017-18 to 2024-25 at an average annual rate of 239 dwellings per annum. The delivery rate for the remaining dwellings, outside of existing reserved matters applications, has been supplied by the master developer Urban & Civic."*
32. In the Council's Housing Land Supply Position Statement 2022-2027, the Council anticipated that the delivery of the remainder of the allocation would begin with 63 dwellings in 2023/24, followed by 65 dwellings in 2024/25, 80 dwellings in 2025/26 and 153 dwellings in 2026/27.
33. However, the 2024 - 2029 Statement, considered that the delivery of the site will not begin until 2025/26 with just 80 dwellings anticipated, followed by 175 dwellings in 2026/27, 225 dwellings in 2027/28 and 225 dwellings in 2028/29.
34. The updated 2025–2030 Statement pushes delivery back again, programming completions over 2026–2030 (and beyond) a clear pattern of slippage relative to earlier 5YHLS trajectories, indicating ongoing delivery delays at Houlton
35. An outline application for the wider site for up to 6,200 dwellings was approved by the Council on 20th May 2017 (ref: R11/0699). A Section 73 application for minor material amendments to R11/0699 was approved by the Council on 27th June 2020 (ref: R17/0022).
36. The remainder of the allocation area that is relied upon for future years largely has outline permission only, with substantial quantum still without detailed (reserved matters) consent.
37. A reserved matters application within Houlton (Phase 3E, 25 dwellings) was validated on 13 August 2021 (ref: R21/0874) and remains pending determination after a prolonged period.
38. The trajectory anticipates 80 dwellings being delivered between 2026–2027; however, with only an undetermined RM application for 25 dwellings currently submitted, it is highly unlikely that 80 completions will be achieved within this period. This casts substantial doubt on the Council's short-term delivery expectations.
39. Similarly, Key Phase Four – Parcel E is expected to deliver 37 dwellings in 2026–2027. Although a planning decision is reportedly forthcoming, no approval has yet been issued. In the absence of a reserved matters consent, the delivery of 37 units within the stated timeframe appears unrealistic.
40. Across the allocation as a whole, an estimated 3,873 dwellings remain without reserved matters approval. Given ongoing slippage in Council trajectories and the heavy reliance on outline-only phases, there is a material risk that projected delivery rates will not be achieved. In this context, it is essential that *more suitable and genuinely deliverable sites* such as Land to the north of Lilbourne Road—are incorporated into the Local Plan Review. Doing so would reduce reliance on speculative applications, support a stable land supply, and

help achieve long-term growth objectives. Without a robust five-year supply, speculative unallocated proposals will proliferate, undermining the plan-led system and resulting in dispersed, less sustainable development. A planned allocation at Lilbourne Road would provide a controlled, deliverable, and sustainable alternative.

- 41. The local plan seeks to deliver 10,812 dwellings over the plan period (2025 – 2042) equal to 636 dwellings per year. This requirement is based on the Government’s revised Standard Method (2024) and is robustly supported by the Updated Housing Needs Evidence (2025). We consider the housing requirement to be justified, proportionate, and consistent with national policy.
- 42. The Plan meets this need through a balanced spatial strategy, distributing growth across a mix of sources, including strategic sites, medium-sized rural allocations, existing commitments, permissions, and windfall development. A total of 2,886 dwellings is allocated under Policy S6, including Site ID 129. This approach aligns with the evidence base, which recognises the importance of a pipeline of small and medium-sized sites capable of early delivery. Site ID129, in particular, provides a valuable early contribution to supply, complementing larger strategic sites that have longer led-in times.
- 43. While the Council has historically demonstrated strong housing delivery regularly exceeding the standard method requirement of 636 dwellings per annum this performance has been achieved through a balanced mix of both large strategic allocations and smaller deliverable sites. However, as set out above, there are significant concerns regarding the deliverability of the remaining phases at Houlton. Since 2021, only one reserved matters application has been submitted for the wider outline area 25 dwellings at Phase 3E and this application remains undetermined, more than three years after validation
- 44. Given the repeated slippage in Houlton’s delivery trajectory and the continued reliance on outline-only phases—amounting to over 3,000 dwellings yet to secure reserved matters approval—it is prudent for the Council to diversify its supply by identifying additional smaller, readily deliverable sites. The Council cannot reasonably rely on the assumption that the outstanding Houlton units will be fully delivered within the plan period, particularly in light of the delays evidenced across successive Housing Land Supply Position Statements and the limited progress on reserved matters since 2021. Smaller sites, capable of early delivery and less susceptible to strategic-scale phasing constraints, are essential to ensuring supply resilience and avoiding an increasing dependence on speculative applications outside the plan-led framework.
- 45. The site is in single ownership, is free from major technical constraints, and is being actively promoted by Davidsons Homes a housebuilder with a proven track record of high-quality delivery in Rugby and the wider Midlands area. Pre-application discussions are already underway, and technical assessments (ecology, highways, drainage, heritage, landscape) are being prepared to support an imminent planning application. This places the site firmly within the NPPF definition of a deliverable site and provides confidence that it can begin contributing to Rugby’s housing supply within 2–3 years of adoption, with the following anticipated timeframe at a build out rate of 40 dwellings per annum.

- **Pre-Application Stage (Ongoing – Autumn 2026)**
- **Planning Application Submission (Autumn 2026)**
- **Determination Period (Autumn 2026 – Spring 2027)**
- **Development Commencement (Autumn 2027)**
- **First Occupations (Autumn 2028)**
- **Full Completion (Autumn 2029)**

46. Given the borough's current supply deficit, early deliverable sites like this are essential to ensuring the Plan is effective at the outset of the plan period. Early delivery reduces reliance on large strategic sites with significant lead-in time and helps guard against speculative applications in less sustainable locations.
47. As such, with the inclusion of land to the north of Lilbourne Road, within the Local Plan, the plan meets the positively prepared test in paragraph 35 of the NPPF, which requires local plans to fully address assessed housing requirements.

S6 residential allocations

48. We support the allocation and consider the development requirements set out in the annex to be sound. The criteria are proportionate to the scale and nature of development and appropriately reflect the site's opportunities and constraints. They balance the need for a policy-compliant, well-designed scheme with flexibility for detailed design. The requirements meet the tests of soundness justified, effective and consistent with national policy and are therefore supported.
49. The site is in single ownership, unconstrained, and subject to active developer interest from Davidsons Homes. Technical work is already underway, with pre-application discussions arranged, demonstrating that this site is genuinely deliverable. Landscape, heritage and ecological considerations can all be effectively mitigated through a landscape-led masterplan that retains boundary vegetation, addresses the setting of nearby listed buildings, and safeguards the wider character of Clifton upon Dunsmore when compared to alternatives with greater constraints, this site is notably more achievable.
50. The proposed quantum of development proposed in allocation ID129 is proportionate to the settlement's scale and function. The ability of the site to contribute to the five-year housing land supply strengthens the justification for its inclusion, especially given Rugby's current shortfall. A deliverable, policy-compliant site such as land to the north of Lilbourne Road is essential to maintaining a plan-led approach and avoiding speculative, unplanned development elsewhere. Failure to retain the allocation in the Local Plan risks the plan being found unsound, as it would not present a reasonable, evidence-based approach to meeting housing needs

EN4 Areas of Separation

51. We support the proposed Areas of Separation to the northwest, west and southwest of Clifton upon Dunsmore, which appropriately prevent coalescence with Rugby. This designation reinforces that there are only limited opportunities for growth around the village, and it highlights the suitability of Site ID 129 as a logical and sustainable option located to the northeast of the settlement. Development in this location would not contribute to settlement coalescence, while still enabling improved pedestrian and cycle connections that strengthen sustainable linkages between Clifton upon Dunsmore and Rugby.

H1 Housing Mix

52. While the detailed housing mix is set out in the supporting text rather than the policy wording itself which is generally supported as it ensures an appropriate degree of flexibility and avoids over-prescription concern is raised regarding the explicit reference within the policy to the Housing Needs Evidence 2025 evidence document. Embedding a fixed reference point in the policy risks reducing flexibility over the plan period, particularly if the 2025 Housing Needs Evidence becomes out of date or is superseded by refreshed assessments. Whilst the policy does state, 'and any other appropriate local evidence' the exact reference to the 2025 evidence is too rigid.

53. To ensure the policy remains justified and effective throughout the plan period, the wording should allow for the use of the most up-to-date evidence available at the time an application is determined, rather than locking applicants and decision-makers into reliance on a single dated document. We also recommend that the wording of the policy allows for variations from the identified mix where justified by site-specific circumstances, evidence of local need or viability considerations.

H2 Affordable Housing

54. We consider the affordable housing requirements to be justified, effective, and fully aligned with national policy. They are supported by the robust evidence set out within the Housing Needs Evidence (2025), and the policy appropriately incorporates flexibility through the application of viability assessments.
55. We also support the proposed 70/30 tenure split, which is consistent with and clearly justified by the evidence base.

I1 Transport

56. Active-travel-led development is strongly supported by national policy, and the requirement for safe, convenient and direct routes for walking and cycling represents a proportionate and evidence-based expectation. This approach aligns with both national and local transport strategies and demonstrates that the Council has selected a reasonable and appropriate policy direction.
57. This emphasis on sustainable movement further strengthens the justification for allocating Site ID 129, which offers clear opportunities to deliver well-connected routes linking the site to the wider area. The site is well located, the associated infrastructure requirements are realistic, and Site ID 129 can be delivered without major constraints. By evidencing that the allocation can accommodate high-quality active-travel connections, the Plan demonstrates that the site is deliverable, capable of integrating effectively with the wider village and Rugby town, and that the policy can be applied consistently through the decision-making process.

Legally Compliant

58. Based on the Regulation 19 Proposed Submission documents published in January 2026; we consider the Rugby Local Plan to be legally compliant. The Plan has been prepared and consulted upon in accordance with the Council's Local Development Scheme and the Statement of Community Involvement, with Regulation 19 consultation material explicitly confirming that the Plan has been shaped through public and stakeholder engagement at earlier stages.
59. The Council has undertaken ongoing engagement with neighbouring authorities and statutory bodies, demonstrating adherence to the Duty to Co-operate. Evidence of this includes documented cross-boundary discussions with Warwickshire County Council and other local authorities, reflected in consultation updates and supporting material.
60. The Plan is also supported by a full Sustainability Appraisal, forming part of the suite of documents published for Regulation 19 consultation and intended for submission to the Secretary of State.
61. Accordingly, we consider the Regulation 19 Rugby Borough Local Plan (2026) to meet the legal compliance requirements necessary for submission to examination.

Complies with the Duty to co-operate

62. The Duty to Co-operate is a legal requirement under the Planning & Compulsory Purchase Act 2004, obliging local planning authorities to work constructively, actively, and on an ongoing basis with neighbouring authorities and prescribed bodies on strategic, cross-boundary matters. The Council must demonstrate that it has engaged early and meaningfully, and that strategic issues affecting more than one authority have been jointly considered.
63. The Rugby Local Plan has been prepared following extensive engagement with residents, businesses, landowners, developers, and site promoters, as well as with neighbouring local authorities.
64. Cross-boundary strategic matters such as housing need and distribution have been addressed. Rugby has historically accommodated unmet housing need from Coventry, and engagement with Coventry and other Warwickshire authorities is documented within the HEDNA and subsequent evidence updates.
65. Furthermore, the Regulation 19 submission documents include a comprehensive Consultation Statement, which summarises how the Council has engaged with all required Duty to Co-operate bodies throughout the plan-making process.


Conclusion

66. In conclusion, these representations demonstrate that Land north of Lilbourne Road (Site ID 129) is a suitable, available, achievable, and deliverable site that can make a significant and strategically important contribution to the objectives of the Rugby Borough Local Plan (Regulation 19, 2026). Its inclusion within Policy S6 is not only justified but necessary to ensure the Plan delivers a robust and sustainable pattern of growth across the borough.
67. The evidence confirms that the site is well-located, free from major constraints, and capable of early delivery an essential consideration given Rugby's current five-year housing land supply position. As a small to medium-sized site in single ownership, actively promoted by a housebuilder with a proven trackrecord, it can deliver new homes within the first years following adoption, supporting the Plan's effectiveness and reducing reliance on speculative development.
68. Allocating the site also aligns fully with the Plan's spatial strategy and the Settlement Hierarchy, directing proportionate growth to a Main Rural Settlement and strengthening the vitality of Clifton upon Dunsmore. The Sustainability Appraisal demonstrates that growth in this location performs strongly against sustainability criteria, particularly in respect of access to services, integration with the existing settlement, and opportunities for enhancing active travel connections.
69. By contrast, failure to retain the allocation would weaken the Plan's ability to demonstrate a sufficient supply of deliverable land, undermining both its soundness and its resilience at examination. Including Site ID 129 ensures the Plan is positively prepared, justified, effective, and consistent with national policy, fully meeting the tests of soundness set out in the NPPF.
70. Finally, we consider the Regulation 19 Local Plan to be legally compliant. It has been prepared in line with the Local Development Scheme and the Statement of Community Involvement, is supported by a lawful Sustainability Appraisal, and is accompanied by a clear record of engagement demonstrating that the Duty to Co-operate has been satisfied.

71. For all of these reasons, we respectfully request that Site ID 129 – Land north of Lilbourne Road, Clifton upon Dunsmore – is retained within the submitted Local Plan, and that the Plan proceeds to examination with this allocation in place to support a deliverable, sustainable, and evidence-led strategy for growth across Rugby Borough.

CERDA PLANNING

March 2026



Memorandum of Understanding (MoU)

Site: Land North of Lilbourne Road, Clifton upon Dunsmore

Date:

1. Purpose of this Memorandum

This Memorandum of Understanding (MoU) confirms the shared commitment between Rugby Borough Council ("the Council") and Davidsons Homes ("the Developer") to work collaboratively on the assessment, potential allocation, and future delivery of Land North of Lilbourne Road, Clifton upon Dunsmore within the Rugby Borough Local Plan Review. This MoU is non-binding and seeks to:

2. Parties to the Memorandum

This MoU is entered into between:

- Landowner 1:
- Developer:
- Local Planning Authority:

3. Site Description

Site ID 129 comprises land located North of Lilbourne Road, Clifton upon Dunsmore, forming a strategic opportunity within the emerging Local Plan for residential-led development supported by complementary uses, green infrastructure, and transport connections.

4. Shared Objectives

The Parties confirm alignment in their intention to secure allocation, demonstrate deliverability, prepare a coordinated masterplan, ensure timely infrastructure delivery, and support the Local Plan Examination through joint evidence.

5. Commitments of the Landowners

The Landowners will work cooperatively with Davidsons Homes ("the Developer").

6. Commitments of Davidsons Homes

The Developers agree to commission technical assessments required to support a robust planning application for the site. This will include engaging in pre-application discussions with the Council to ensure that the emerging proposals are aligned with the Local Plan timetable and provide clear evidence of deliverability and viability.

7. Commitments of the Council

The Council commits to supporting the site's progression, engaging constructively, providing timely feedback, and acting as a signatory to demonstrate deliverability.

8. Deliverability and Phasing

The Parties agree that the site can deliver development within the first five years following adoption of the Local Plan and that a comprehensive scheme is achievable.

9. Non-Binding Status

This MoU is non-statutory and non-binding. It does not create legal or contractual obligations. It reflects a positive working relationship and shared understanding. It may be updated by mutual consent as the Local Plan progresses.

10. Signatures

Signed on behalf of Landowner:

Name: _____

Signature: _____

Date: _____

Signed on behalf of Davidsons Homes:

Name: _____

Role: _____

Signature: _____

Date: _____

Signed on behalf of Rugby Borough Council:

Name: _____

Role: _____

Signature: _____

Date: _____

CONFIDENTIAL