Newton Manor Lane, Rugby

Rugby Local Plan Review - Proposed Submission Version January 2026

Representations on behalf of Latimer Developments Ltd

Rugby Borough Council

13 March 2026

LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 60 years.

lichfields.uk

Formatted for double sided printing.
Plans based upon Ordnance Survey mapping with the permission of His Majesty's Stationery Office.

62575/01/JK/JRw
40867707v1

Contents

Appendices

Appendix 1 Illustrative Masterplan

1.0 Introduction

1.1 These representations to the Rugby Borough Local Plan: Proposed Submission Local Plan (January 2026) ("PSLP") have been prepared by Lichfields on behalf of Latimer Developments Ltd ("Latimer").

1.2 We focus on the strategic matters, housing allocations and relevant development management policies that are contained within the PSLP and relate specifically to Latimer's land interests at Newton Manor Lane, Rugby ("the site").

1.3 Importantly, Latimer welcomes the continued allocation of the site in the PSLP and seeks to work constructively with the Council as it progresses towards the submission and adoption of the new Local Plan and trusts that the comments contained within this document will assist Officers in this regard.

Plan Making To Date

1.4 On 14th December 2022, the Council decided to go ahead with a full update of the Local Plan policies. The Issues and Options consultation and 'Call for Sites' exercise to inform their Housing and Economic Land Availability Assessment (HELAA) was undertaken in late 2023/early 2024.

1.5 The Council also published an updated Local Development Scheme (LDS) in October 2024. This sets out the timetable for progressing the new Local to adoption. The Preferred Options (Regulation 18) consultation was undertaken in May 2025. Following the current PSLP consultation, the plan will be submitted for examination in June 2026 with adoption to take place by the middle of 2027.

Land at Newton Manor Lane, Rugby

1.6 Latimer has been promoting land at Newton Manor Lane, Rugby for landscape-led residential development since the Local Plan review was commenced, and as noted above, this site has been included within the PSLP as a residential allocation for 285 dwellings, following draft allocation within the PO consultation document for 240 dwellings (Site reference: 59).

1.7 Latimer's vision for the site has been informed by analysis of local context and a focus on sustainability and health and wellbeing with the creation of significant amounts of attractive and publicly accessible green space, SuDS and biodiversity enhancements. Latimer has the capability and expertise to deliver this vision for the site and is committed to working constructively with the Council and local stakeholders through the plan-making process.

1.8 A substantial amount of technical work has been undertaken and is ongoing to inform the evolving design of the residential development relating to ecology, landscape, heritage and archaeology, and flood risk and drainage. The latest Illustrative Masterplan is included at **Appendix 1**.

Structure

1.9 These representations are structured around and respond to specific policies within the PSLP and the evidence base documents, as follows:

- Policy S2: Strategy for Homes
- Policy S6: Residential Allocations

2.0 Policy S2: Strategy for Homes

The Plan Period

2.1 Policy S2: Strategy for Homes states, *"To meet our future need for housing, 10,812 new homes will be delivered in the period 2025-2042 (636 each year)"*.

2.2 The National Planning Policy Framework (2024) (NPPF) is clear that:

"Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure." (Para 22)

2.3 The PSLP proposes that the plan period covers the period 2025 to 2042 (i.e. a 17-year plan period). The NPPF is clear that strategic policies should cover 15 years, and, crucially, this should be from adoption. The Council's Local Development Scheme (LDS) – published in October 2024 – sets out a timetable for the new Local Plan to be adopted by mid-2027. Assuming the plan is submitted in June 2026, the Examination in Public (EiP) is prompt, and the plan is adopted swiftly in 2027, this would only equate to a 15-year plan period from adoption. The Council's proposed plan period would accord with the requirements of the NPPF, but should any delays occur with the EiP or to the adoption of the Plan, this would risk falling below the 15-year period stated within the NPPF.

2.4 To ensure the PSLP is 'consistent with national policy' and therefore 'sound', Latimer recommends that the Council extend the plan period to 2043 as a minimum, providing for an additional year to allow for EiP and adoption. Even with some slippage in the EiP programme, it is highly likely that a 15-year time horizon for the plan would be maintained on this basis. Latimer considers this to be a reasonable approach to address this issue and to ensure alignment with the requirements of paragraph 22 of the NPPF. As a consequence, the Council will need to amend the housing requirement set out in Policy S2 to reflect an additional year's worth of housing based on the Council's proposed annualised requirement.

The Housing Requirement

2.5 Policy S2 identifies the requirement to provide 10,812 new homes (636 each year) over the plan period, to meet future need for housing. The policy continues to outline the sites and locations where the new homes will be delivered, which totals 11,729 dwellings. This aligns with the Council's LHN figure in accordance with the Government's latest standard method for calculating housing need, which is supported by Latimer.

2.6 It is noted that the overall requirement and total number of dwellings to be delivered is reduced from the PO consultation, due to the reduction in the plan period from 20 years to 17 years within the PSLP. Latimer's observations relating to this are outlined above.

Housing Land Supply Buffer

2.7 The proposed delivery of 11,729 new dwellings over the plan period represents 8.5% more than the minimum requirement, providing a buffer, in accordance with NPPF paragraph 78.

2.8 Subsequent to the reduction in the plan period, the total number of dwellings to be delivered and new allocations being made within the PSLP, the housing land supply buffer has been reduced from 9% in the PO consultation.

2.9 Notwithstanding the above and as noted within our previous representations to the PO consultation, the Council may want to look at providing a buffer of greater than 8.5% to ensure additional 'headroom' within the Council's proposed supply to accommodate any delays and provide further flexibility. It is typically suggested that 15-20% buffer is good practice, especially where delivery has previously been an identified issue, and is an approach endorsed by Inspectors in the following examples below:

- Chelmsford: 18% buffer
- South Kesteven: 18% buffer
- Harrogate: 25% buffer
- South Oxfordshire: 27% buffer
- Mansfield: 34% buffer
- Guildford: 36% buffer
- Chesterfield: 59% buffer

2.10 A greater buffer may also be preferable in light of the Council's acknowledged 5-year housing land supply position, which has recently been confirmed as 4.16 years in the Council's latest '5 Year Housing Land Supply Position Statement 2025-2030.

2.11 This is also particularly pertinent with regards to monitoring any unmet needs emerging from neighbouring areas, primarily Coventry, and considering the need for additional housing allocations to reflect requirements for infrastructure investment and the delivery of accelerated levels of affordable housing in line with NPPF paragraph 67.

2.12 At PO consultation, an Interim Sustainability Appraisal (SA) was published which identified that there may be a high-level case for remaining open to the possibility of higher growth scenarios, relating to affordable housing need.

2.13 An SA Report has now been published as part of the PSLP, which considers this matter in further detail, alongside an addendum to the 2022 HEDNA, which updates the evidence base regarding the need for different types of housing, including affordable housing. In this regard, the 'Updated Housing Needs Evidence for Rugby Borough' published in September 2025 confirm that there is identified a net affordable housing need of 475 dpa.

2.14 The Development Needs Topic Paper has also been published as part of the PSLP consultation. This confirms that there is in fact a 338 dpa net need for affordable housing and if those already in accommodation are excluded this reduces to 202 dpa and only 32% of the standard method figure. It is therefore concluded that there is not a clear justification for increasing already high levels of housing delivery as a way to address the need for affordable housing.

Tests of Soundness

2.15 Latimer supports the Council's approach to utilising the revised SM-based LHN figure for plan-making purposes in accordance with the requirements of the NPPF. However, Latimer

suggests the following changes to ensure that the PSLP is considered by the Local Plan Inspector to be 'positively, in a way that is aspirational but deliverable', nor is it 'consistent with national planning policy', or 'justified' by proportionate, relevant and up-to-date evidence.

Recommended Changes

1 The Council should, as a minimum, extend the plan period to 2043. For the purposes of Policy S2, this would mean that the Council's housing requirement should be amended to reflect an additional years' worth of need

2 The Council should consider introducing a buffer of more than 8.5% to ensure that the plan is flexible enough to adapt to changing economic circumstances

3.0 Policy S6: Residential Allocations

3.1 Policy S6 sets out the development site allocations shown on the policies map. New homes are focused on Rugby, which, including existing commitments, will accommodate at least 75% of new housing 2025-2042. Within the rural areas new homes are planned at the main rural settlements, with the largest number of new homes planned at Long Lawford.

3.2 Under Policy S6, the Strategic Urban Extensions (SUEs) at Houlton, South West Rugby and Eden Park allocated as part of the currently adopted Local Plan are being rolled forward and will continue to be built out during the forthcoming plan period, but the recognition of the issues with large SUE's and New Settlements within the PSLP is welcomed by Latimer and they are supportive of the proposals to maximise urban capacity within Rugby and the allocation of a number of relatively smaller sites on the edge of Rugby and throughout rural settlements in Rugby.

Land at Newton Manor Lane, Rugby (Site Ref: 59)

3.3 As previously noted, Latimer has been promoting their land interests at Newton Manor Lane, Rugby (Site ref: 59) as part of the Local Plan review. They welcome the allocation of the site for residential development. Latimer consider that the site provides an ideal opportunity to deliver a high-quality, attractive and well-integrated new neighbourhood, on a relatively unconstrained site which forms a natural and logical extension to Rugby accessible to existing facilities and community services.

3.4 The Site Selection Methodology published as part of the PO consultation, identifies three stages of the site selection process and development of reasonable alternatives, which include Stage 1 Housing and Economic Land Availability Assessment (HELAA), Stage 2 Detailed Site Assessment (within the Site Options Assessment) and Stage 3 Sustainability Appraisal (SA). As noted above, the PSLP consultation includes the full SA Report.

3.5 The HELAA updated in December 2025 provides an initial high-level assessment and confirms that the site is available, achievable and potentially suitable. The assessment proforma in Appendix 4 concludes that further assessment is required to determine if the site is locationally appropriate in comparison to other options. A Stage 2 Site Options Assessment has also been updated in December 2025 and provides a more detailed appraisal of land at Newton Manor Lane, and concludes that it is a *"proposed site allocation"* on the basis that it is not located in the Green Belt, the surrounding road network has relatively low levels of congestion, it rates comparatively well for accessibility by non-car modes, there are no heritage constraints identified, medium/low landscape sensitivity and medium ecological sensitivity.

3.6 However, whilst the SA published in December 2025 covers the growth options and scenarios and the overall spatial strategy in detail, it does not assess specific policies or sites allocated in the PSLP against key sustainable development themes. It is therefore difficult to compare how allocated sites have been appraised and determined to be the most sustainable options to take forward. In this regard, it is considered that the site selection may be questioned by the Local Plan Inspector at EiP.

3.7 In terms of Newton Manor Lane, the SA Report states the following at paragraph 5.4.15 with regards to the proposed allocation at Newton Manor Lane. Following on from the

comments made in the previous paragraph, Latimer would raise a note of concern that this is the only assessment of Newton Manor Lane included within the SA Report. Further comments relating to this matter are included with the 'Reasonable Alternatives' subsection below.

"The site…was supported at the Draft Plan stage partly because the landowner was committed to making adjacent land available for the aforementioned secondary school that is no longer required. However, the site is considered to have merit as an allocation regardless of the secondary school consideration. It is noted that the proposed list of site-specific requirements is now lengthier, compared to that at the Draft Plan stage, which is presumably a reflection of the boost to capacity. Ensuring good links into Rugby is a key consideration, and ongoing consideration should also be given to 'future proofing' in light of the ongoing possibility that a secondary school is required on adjacent land (it is noted that site promoter's 2025 consultation response was clear that land can be made available)."

3.8 As part of the PO consultation, we raised the matter of the Sequential Test for any sites proposed for allocation and subject to fluvial flood risk and/or surface flood risk to ensure that the requirements of NPPF paragraph 172 have been met as part of the plan making process. It is noted that the Sequential Test has now been undertaken for all the allocations within the PSLP and has been published alongside this consultation.

3.9 With regards to Newton Manor Lane, the Strategic Flood Risk Assessment (SFRA) confirms that the Sequential Test has been passed recommended that the central southern area is avoided for development to make the site safe for its 100-year lifetime. Obviously, development is dependent on a site-specific FRA with surface water modelling, groundwater investigation and carefully considered SuDS with appropriate management plans. The Illustrative Masterplan included at **Appendix 1** demonstrates compliance accords with these recommendations and would be supported by a site-specific FRA at planning application stage.

3.10 Land at Newton Manor Lane encompasses an area of approximately 28 ha, is currently used as agricultural land and is accessed via Newton Manor Lane, which runs along the southern boundary of the site. The site adjoins the built-up area boundary of Rugby offering a suitable opportunity for a medium-sized extension to the settlement. The site is bound to the northwest by the Great Central Walk, which follows the route of a disused railway line and is designated as the Ashlawn Cutting Local Nature Reserve (LNR). It is now a recreational route for pedestrians and cyclists. Existing residential areas of Rugby dating back 20 years, are located on the other side of the Great Central Walk. The site is bound to the east by a hedgerow along which runs a stream which is a tributary of the River Avon located further south. East of this is a series of pastoral fields. The built edge of Newton village lies approximately 150m east of the site at its closest point.

3.11 The development proposal will provide an array of social, environmental and economic benefits, including but not limited to:

- The provision of approximately 285 dwellings contributing towards meeting the needs of the Borough
- Latimer has the in-house capability to deliver affordable and private sale products which the developer can flex to suit individual sites, accelerate delivery and deliver

market need to operate in varied economic cycles. This includes a range of affordable tenures such as shared ownership, affordable rent and social rent.

- The proposals include up to 50% affordable housing, above the policy requirement, and this will be split between social rent and shared ownership tenures
- A network of safe, convenient and direct pedestrian and cycle paths which provide connectivity to the surrounding area of Rugby and local amenities and facilities. This includes retention of existing PRoWs and creation of new routes/links in the form of a pedestrian footway and cycleway along Newton Manor Lane extending as far as St Thomas Cross
- Short and direct walking and cycling connections will make public transport an easy choice to make
- More than 10 ha of new public open space will provide recreational opportunities, children's play facilities, Trim-Trail, community orchards, allotments and ecological enhancements including biodiversity net gain
- Wildlife corridors will enhance the surrounding local wildlife and nature sites, ensuring the new homes complement and respect these local wildlife assets. New planting will be provided, and existing open space will be enhanced
- Latimer is committed to delivering Net Zero Carbon housing by 2030 that incorporates the latest energy-efficient materials and technology
- The development will generate additional residential expenditure in the local economy
- The site is located in a well-connected location which will ensure good accessibility to existing local community facilities for future residents. This will help provide a high quality of life for future residents.
- The development will maintain the separation gap between Rugby and Newton, ensuring that settlement character is maintained

3.12 It is considered that there is clear evidence that the site is viable and deliverable at the scale of development expected within the plan period. As previously noted, technical survey and assessment work relating to the site is ongoing, and Latimer consider that all technical constraints can be fully addressed and mitigated as part of the future development of the site. Given the scale of development envisaged, Latimer strongly contends that the site could start delivering housing within the first five years of the plan period, at a realistic and deliverable rate. This aligns with the Whole Plan Trajectory published as Appendix 1 of the PSLP.

3.13 Latimer note the more detailed development requirements contained within the Development Sites Annex relating to the proposed allocation of their land interests at Newton Manor Lane, Rugby (Site Ref: 59), and that these have been expanded since the PO consultation.

3.14 The latest Illustrative Masterplan for the site is included at **Appendix 1** and demonstrates how the development meets the development requirements identified, including: pedestrian and cycle links through the development and connecting to the Great Central Wak and Coton Park East, maintaining and integrating existing Public Rights of Way through the site, and inclusion of community orchard and allotments.

3.15 To summarise, Latimer strongly supports Policy S6 and the inclusion of land at Newton Manor Lane as an allocation within the PSLP. The site will deliver new dwellings to meet Rugby Borough's Housing needs whilst also contributing towards helping the Council meet its wider vision and sustainability objectives.

Omission of Secondary School Land

3.16 It is noted that Draft Policy ID2 from the PO consultation relating to land for a secondary school to the east of Site 59 has been removed from the PSLP. The SA Report states that school capacity was a key driver of the spatial strategy and definition of reasonable growth scenarios at Draft Local Plan stage with the understanding at the time being that there was a ned to deliver a new secondary school in the north of Rugby.

3.17 An Education Topic Paper (December 2025) has been produced by the Council with Edge Analytics to model the demand for additional school places as a result of the Local Plan and whether new or expanded schools are likely to be needed to accommodate the new housing proposed in the plan over the 2025-2042 plan period. The modelling confirms a predicted circa two forms of entry shortfall in places at secondary school level. The mitigation for this is likely to be expansion of existing schools. The model does not present clear evidence of a need to expand primary schools or build new schools, beyond those already planned, to meet the demand for places. Latimer considers that the Education Topic Paper provides the evidence required for the removal of the land allocated at St Thomas Cross for a future secondary school.

Reasonable Alternatives

3.18 NPPF para 36b states that for a plan to be found 'sound', it must set out an appropriate strategy, taking account of reasonable alternatives, and be based on proportionate evidence. As such, the Council also needs to robustly test reasonable alternatives for the spatial distribution of the Borough's housing needs through the SA process at an early stage – as per the requirements of paragraph 33 of the NPPF, the PPG[1], and Friends of the Earth High Court judgment.

3.19 In accordance with this requirement, the Council have published a full SA Report in January 2025 as part of the PSLP consultation. As we have previously stated in representations to the PO consultation, the SA rightly notes that Rugby *"must be the focus for growth through the Local Plan"* by virtue of being the largest settlement within the Borough and the top of the settlement hierarchy. However, it also highlights that Rugby has been subject to very high levels of committed growth over recent years which will continue into the next plan period with the continued delivery of SUEs at Houlton, South-West Rugby and Eden Park.

3.20 The previous Interim SA and the full SA Report has looked at a number of alternative growth scenarios to inform the spatial strategy; the first being land at Lodge Farm for a new village (1,800-2,000 homes by 2045); and the second being land at Cosford as an SUE (1,800-2,000 dwellings by 2045). Lodge Farm New Settlement was an allocation within the adopted Local Plan but was subsequently removed by the Inspector due to poor

accessibility (especially by sustainable transport modes), significant adverse impacts on landscape, and substantial harm to the significance of heritage assets (IR para 127-156). Finally, it was concluded that Lodge Farm was not an appropriate site, that its allocation was not justified nor an effective response to addressing the needs of Rugby, and that it did not accord with national policy in enabling the delivery of sustainable development.

3.21 It is well established that SUEs and New Settlements typically face delivery challenges in terms of infrastructure and delays in commencement, which have been evident in Rugby previously, and in this regard, Latimer supports the departure from this strategy in the PSLP. NPPF paragraph 73 promotes the development of a good mix of sites and states that, *"small and medium sized sites can make an important contribution to meeting housing requirements of an area….and are often built-out relatively quickly."*

3.22 Latimer support the conclusions of the SA Report with regard to alternative growth scenarios relating to further SUEs and a new settlement, as the concerns previously raised with options are still relevant and have not changed. However, the SA Report published in December 2025 does not appear to fully assess the 'reasonable alternatives' in terms of specific policies or sites allocated in the PSLP. It is therefore difficult to directly compare site allocations and how they have scored in relation to key sustainability issues and themes.

3.23 In terms of Newton Manor Lane, the SA Report states the following at paragraph 5.4.15 with regards to the proposed allocation at Newton Manor Lane.

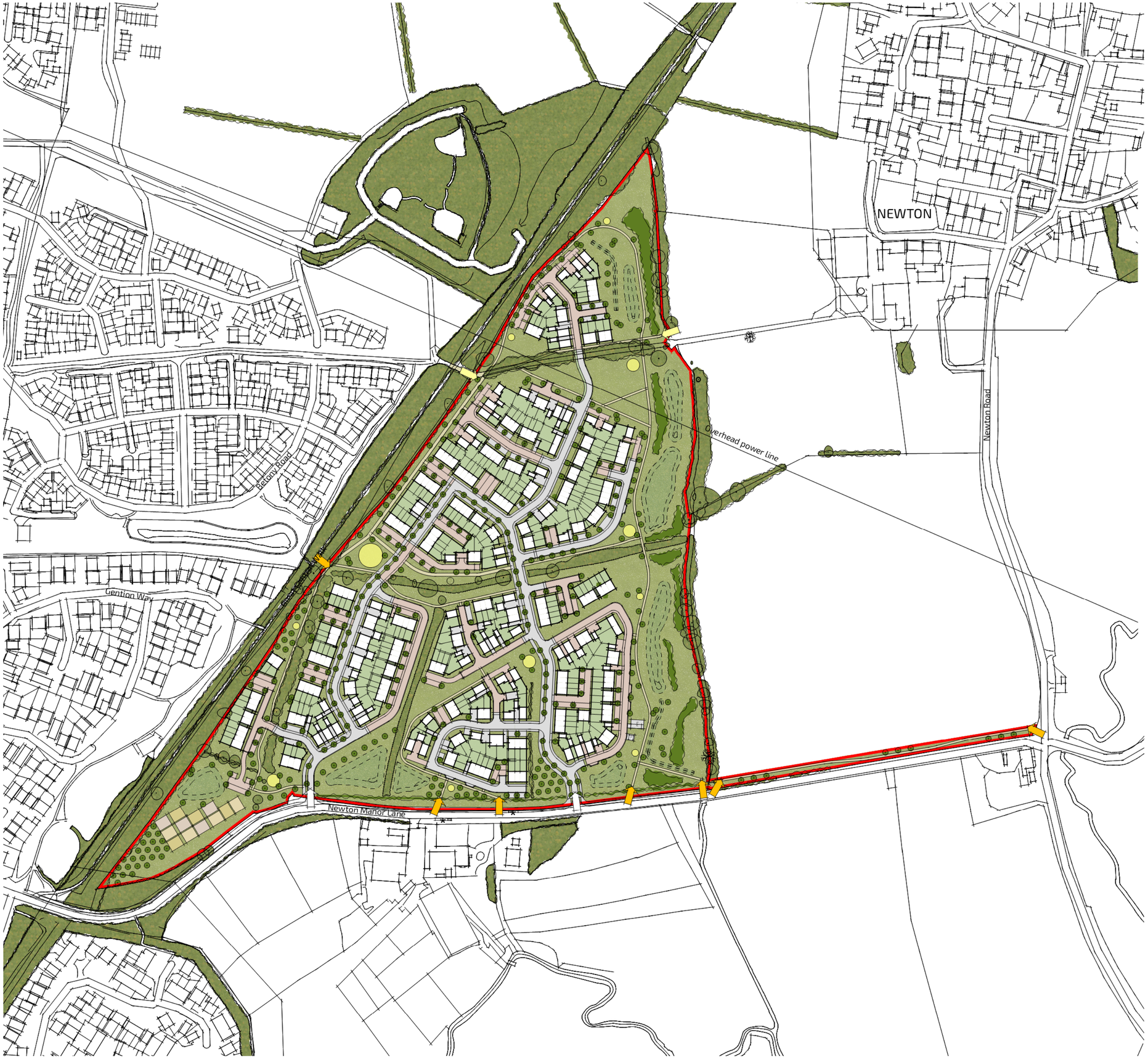
"The site…was supported at the Draft Plan stage partly because the landowner was committed to making adjacent land available for the aforementioned secondary school that is no longer required. However, the site is considered to have merit as an allocation regardless of the secondary school consideration. It is noted that the proposed list of site-specific requirements is now lengthier, compared to that at the Draft Plan stage, which is presumably a reflection of the boost to capacity. Ensuring good links into Rugby is a key consideration, and ongoing consideration should also be given to 'future proofing' in light of the ongoing possibility that a secondary school is required on adjacent land (it is noted that site promoter's 2025 consultation response was clear that land can be made available)."

3.24 Following on from the comments made in paragraph 3.22, Latimer raise concern that this is the only assessment of Newton Manor Lane included within the SA Report. It is not possible to ascertain from the SA Report how the site scored in relation to key sustainability matters and how this has been selected as a preferred site over other omission sites.

Tests of Soundness

3.25 Latimer supports the Council's spatial strategy, appraisal of growth options and associated conclusions and the site allocations within the PSLP, however, they do not consider that the site selection process has been fully evidenced within the SA Report. The assessment of Newton Manor Lane seems to focus heavily on the inclusion of land for a secondary school as opposed to the merits of the land for residential development. The Local Plan Inspector may question this in terms of the requirement for the Local Plan to be 'consistent with national planning policy' and 'justified' by proportionate, relevant and up-to-date evidence.

Appendix 1 Illustrative Masterplan



N

0 50 100 150 200 250m

KEY

- Application boundary 17.34ha
- Existing built development
- Existing tree and hedgerow planting
- Proposed development
- Proposed trees / hedgerows / planting
- Proposed orchard
- Proposed footpath
- Proposed equipped children's play area
- Proposed allotments with car parking
- Proposed drainage attenuation feature
- Proposed access
- Potential pedestrian and cycle access
- Existing pedestrian and cycle access
- * Proposed bus stop on Newton Manor Lane

rev	date	description	drn / chk
P07	02/03/2026	Amended to comments; drainage updated.	JMG / JMG

client
Clarion Housing Group

project
Land at Newton Manor Lane, Rugby

title
ILLUSTRATIVE MASTERPLAN

scale
1:2500 @ A2

number
13535-FPCR-XX-XX-DR-A-0001

status
S3

rev
P07

FPCR | environment & design

L:\13500\13535\ARCH\Drawings\13535 Proving Layout v7.vwx
t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk

Birmingham
0121 713 1530
birmingham@lichfields.uk

Bristol
0117 403 1980
bristol@lichfields.uk

Cardiff
029 2043 5880
cardiff@lichfields.uk

Edinburgh
0131 285 0670
edinburgh@lichfields.uk

Leeds
0113 397 1397
leeds@lichfields.uk

London
020 7837 4477
london@lichfields.uk

Manchester
0161 837 6130
manchester@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk

@LichfieldsUK

lichfields.uk