

## 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" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Jonathan"/>
Last Name	<input type="text"/>	<input type="text" value="Sebbage"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate Director"/>
Organisation (where relevant)	<input type="text" value="Miller Homes"/>	<input type="text" value="Savills"/>
Address Line 1	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="REDACTED"/>

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

Name or Organisation: **Savills on behalf of Miller Homes**

3. To which part of the Local Plan does this representation relate? **Please see accompanying report**

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	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"/>

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 accompanying report**

(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 accompanying report**

(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:

**Miller Homes consider that the Proposed Submission Local Plan is not sound and would like the opportunity to set out how alterations could be made to the Plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying report.**

*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.

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

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**Miller Homes**

# **Rugby Borough Local Plan Regulation 19 Consultation (January 2026) – response on behalf of Miller Homes**

Date: March 2026

PREPARED FOR



**savills**

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# Executive Summary

- I. These representations have been prepared on behalf of Miller Homes in response to the Regulation 19 consultation relating to the Rugby Borough Local Plan 2025-2042: Proposed Submission version (January 2026). Miller Homes has land interests at Land at Brownsover Road, Rugby ('the Site') and therefore has a particular interest in the new draft Local Plan.
- II. The Site was previously identified for release from the Green Belt in the Publication Draft Local Plan 2011-2031 (September 2016) and has since been promoted through the preparation of the current emerging Local Plan. These representations demonstrate that the Site is a suitable and sustainable location for new housing and should be allocated in the Local Plan.
- III. This report identifies several areas where the Proposed Submission Local Plan (January 2026) does not currently meet the NPPF (2024) tests of soundness.
  - No overarching Vision is provided, weakening the justification for the spatial strategy and policy framework.
  - The Plan period is not sufficient and constrains the ability to positively address future needs.
  - The housing requirement is set at the minimum standard method figure despite clear evidence of acute affordable housing need (338 dpa), strong historic delivery above 636 dpa, economic growth ambitions and potential future unmet need from Coventry.
  - The spatial strategy directs a relatively small proportion of new allocations at Rugby, despite it being the most sustainable settlement, and shifts growth disproportionately to rural Green Belt villages.
  - The Sustainability Appraisal does not assess Brownsover Road as a reasonable alternative, despite its positive assessment in the Council's evidence base.
  - The heavy reliance on large strategic sites risks delays to delivery and the ability to demonstrate a continuous five year supply.
  - A number of sites are proposed for allocation contrary to the Council's evidence base.
- IV. Accordingly, the following changes are recommended in order to ensure the soundness of the Plan,
  - Introduce a clear Vision to guide the Plan.
  - Review and update the Objectives and Strategic Priorities to include a focus on housing delivery.
  - Extend the Plan period to at least 2043.
  - Increase the housing requirement above the minimum standard method figure.
  - Review and update the spatial strategy to direct more growth to Rugby.
  - Update the Sustainability Appraisal to assess Brownsover Road as a reasonable alternative.
  - Allocate Land at Brownsover Road, Rugby as a sustainable grey belt site to support meeting local housing needs in line with the Council's evidence base.

# 1. Introduction to Representations

## 1.1 Introduction

- 1.1.1 This report has been prepared on behalf of Miller Homes in response to the Regulation 19 consultation relating to the Rugby Borough Local Plan 2025-2042: Proposed Submission version (January 2026).
- 1.1.2 Miller Homes has land interests at Land at Brownsover Road, Rugby ('the Site') and therefore has a particular interest in the new draft Local Plan. The Site was previously identified for release from the Green Belt in the Publication Draft Local Plan 2011-2031 (September 2016) (however was subsequently retained within the Green Belt in the adopted Local Plan 2011-2031 (June 2019)) and has since been promoted through the preparation of the current emerging Local Plan.
- 1.1.3 This report responds to the current Regulation 19 consultation and seeks to assist in informing the ongoing preparation of the Rugby Borough Local Plan 2025-2042.

## 1.2 Site Context

- 1.2.1 The Site is located on the north-western built-up edge of Rugby approximately 500m north-east of Newbold-on-Avon and approximately 2km north-west of Rugby town centre, as outlined in red on Figure 1 below and at Appendix A (Drawing No. 01).
- 1.2.2 The Site itself is approximately 8.27ha and comprises a broadly triangular piece of grassland defined by existing hedgerows. The Site is designated within the Green Belt in a wedge between the designated Urban Edge which defines the Site along both its eastern and south-western boundaries.
- 1.2.3 The Site is bound to the north by Brownsover Road which connects to the A426 and M6 to the north-east. To the east, the Site is bound by the Viaduct Cycleway (which runs towards Rugby town centre) and a large industrial area (comprising existing designated employment sites). To the south-west is the Oxford Canal, beyond which is a predominantly residential area together with Newbury Quarry Country Park (a designated Local Wildlife or Geological Site) and Newbold Glebe Allotments. The Site is located entirely within Flood Zone 1.

Figure 1: Site Location Plan



- 1.2.4 Notably, the Site was previously identified for release from the Green Belt in the Publication Draft Local Plan 2011-2031 (September 2016). Paragraph 4.30 of the Publication Draft Local Plan 2011-2031 (September 2016) explained that:
- ‘Land at Brownsover Road is not considered to serve the purposes of the Green Belt and this designation has therefore been removed and the Green Belt boundary amended accordingly’.*
- 1.2.5 However, in the Inspector’s Report (March 2019) (paragraphs 215-218) the Local Plan Inspector concluded (in relation to the Site and one other parcel on the edge of Coventry) that:
- ‘neither parcel of land is required to meet the objectively assessed development needs of the borough or the unmet needs of Coventry...Therefore, exceptional circumstances do not exist to justify altering the Green Belt boundaries...’.*
- 1.2.6 The Local Plan 2011-2031 was therefore subsequently adopted in June 2019 without the release of the Site from the Green Belt.
- 1.2.7 More recently, the Site has been promoted through the preparation of the current emerging Local Plan, including through the Regulation 18 consultation and Call for Sites. The Site has subsequently been assessed in the Council’s evidence base work, including the Housing and Economic Land Availability Assessment (HELAA) (December 2025), Green Belt Contribution Study (December 2025) and Stage 2 Site Options Assessment (December 2025).
- 1.2.8 Notably, the Site (ref. 102) was assessed as *‘available’*, *‘achievable’* and *‘potentially suitable’* for a potential yield of 150 units in the Council’s Housing, and Economic Land Availability Assessment (HELAA) (December 2025).
- 1.2.9 The Site was also identified as performing a *‘moderate’* contribution to purpose A, a *‘moderate’* contribution to purpose B and a *‘weak/no’* contribution to purpose D of the Green Belt, and therefore assessed as *‘potential to be grey belt’* (subject to consideration of NPPF (2024) footnote 7) in the Council’s Green Belt Contribution Study: Stage 2 Site Contribution Assessments (December 2025). This was acknowledged within the Council’s Stage 2 Site Options Assessment (December 2025); however, the Stage 2 Site Options Assessment (December 2025) concluded that the Site should be *‘not progressed’* based solely on *‘lack of suitable pedestrian access’*.
- 1.2.10 In this regard, work by Miller Homes demonstrates that a safe and suitable pedestrian access can be delivered from Brownsover Road via improvements to Green’s Bridge (as shown at Drawing No. 110952 PEF ZZ XX DR C 0100 (Appendix D)). The Site itself is also not subject to relevant designations listed in NPPF (2024) footnote 7 and therefore it is considered that the provisions of NPPF (2024) footnote 7 would not provide a ‘strong reason for restricting’ proposed development. It is also noted that the draft NPPF (December 2025) proposes to remove the current footnote 7 considerations in so far as they are relevant to determining whether land comprises grey belt.
- 1.2.11 Accordingly, given the site is acknowledged to meet the criteria for grey belt, our response to the current Regulation 19 consultation explains that the Site should be allocated for residential development to support Rugby’s future growth.

## 1.3 Report Structure

- 1.3.1 This report is structured as follows based on the draft policies (and related supporting evidence base documents) contained within the Rugby Borough Proposed Submission Local Plan (January 2026):
- **Sections 2-7** contain representations relating to the ‘Objectives’ and ‘Strategic Priorities’, spatial strategy and draft Policies S1, S2, S5 and S6 within the ‘Strategy’ section (chapter 1) of the Proposed Submission Local Plan (January 2026);
  - **Section 8** contains representations relating to draft Policies EN1, EN2, EN5 and EN7 within the ‘Environment’ section (chapter 5) of the Proposed Submission Local Plan (January 2026);

- **Section 9** contains representations relating to draft Policies H1, H2 and H7 within the 'Housing' section (chapter 6) of the Proposed Submission Local Plan (January 2026);
- **Section 10** contains representations relating to draft Policies D3, D4 and D5 within the 'Design' section (chapter 8) of the Proposed Submission Local Plan (January 2026);
- **Section 11** contains representations relating to draft Policies I1 and I4 within the 'Infrastructure' section (chapter 9) of the Proposed Submission Local Plan (January 2026); and
- **Section 12** provides an overall conclusion to the report.

1.3.2 This report is appended by a Site Location Plan (Drawing No. 01) (Appendix A), proposed Land Use Plan (Drawing No. 06) (Appendix B), Illustrative Framework Plan (Drawing No. Ai01A) (Appendix C) and potential highways improvement plan (Drawing No. 110952 PEF ZZ XX DR C 0100 (Signalised Crossing Over Canal Bridge)) (Appendix D) illustrating potential highways improvement over Green's Bridge.

## 2. Objectives and Strategic Priorities

### 2.1 Introduction

2.1.1 At the outset of the Proposed Submission Local Plan (January 2026), the Council set out a series of 6 short numbered 'Objectives' followed by 7 'Strategic priorities' and the relevant strategic policies intended to address these strategic priorities.

2.1.2 The Council's 'Objectives' (page 6) are as follows:

1. *"Support the diversification and growth of Rugby Borough's economy in sustainable locations*
2. *Support the revival of Rugby town centre*
3. *Reduce carbon emissions and adapt to climate change*
4. *Raise design standards*
5. *Deliver infrastructure-led growth*
6. *Facilitate a greener, more biodiverse borough"*

2.1.3 The 'Strategic priorities' (page 7) are as follows:

- *"Provision of homes*
- *Provision of employment land*
- *Overall pattern and scale of development and conservation*
- *Climate change*
- *Town centre development*
- *Design standards*
- *Infrastructure and community facilities delivery"*

### 2.2 Response

2.2.1 The National Planning Policy Framework (NPPF) (2024) is clear that, '*Succinct and up-to-date plans should provide a positive vision for the future of each area...*' in order to provide a framework for meeting future needs and addressing priorities.

2.2.2 Notably however the Proposed Submission Local Plan (January 2026) does not include an overarching Vision, but rather sets out only a list of short 'Objectives' and 'Strategic priorities' without any supporting explanation. This is an important omission as the inclusion of a Vision will help to guide the overall direction of the Plan and provide an overarching framework for how future housing and other needs are met over the Plan period. This will also in turn help to inform more specific objectives, priorities and the spatial strategy for accommodating new development.

2.2.3 The overall 'Objectives' and 'Strategic priorities' appear to broadly follow the overarching economic, social and environmental themes of sustainable development set out in the NPPF (December 2024) (paragraph 8). There is however no information in the Proposed Submission Local Plan (January 2026) to explain how the individual 'Objectives' and 'Strategic priorities' set out have been identified and how the 'Objectives' and 'Strategic priorities' relate to each other. It is also unclear what some of the 'Strategic priorities' are specifically seeking (e.g. '*Overall pattern and scale of development and conservation*').

2.2.4 This approach contrasts with the adopted Local Plan (2019) (Chapter 2) which sets out a clear Context, Vision and Objectives and explains that the objectives have been developed '*in order for the vision to be fulfilled and for the key issues to be addressed*'.

2.2.5 More specifically, whilst there is a 'Strategic priority' identified relating to the 'provision of homes', there is no specific reference to housing delivery within the overarching preceding 'Objectives'.

2.2.6 Paragraph 61 of the NPPF (2024) clearly sets out the Government's objective of '*significantly boosting the supply of homes*' (paragraph 61) and the recent draft NPPF (December 2025) further

emphasises the Government's focus on housing delivery. It is therefore important to ensure that the Objectives for the Local Plan include a focus on supporting housing delivery (including affordable housing) to meet local needs, in accordance with the aims of national planning policy. This is particularly important given the Council's increasing housing needs (i.e. increasing from 480 dwellings per annum (dpa) in the Updated Assessment of Housing Need: Coventry-Warwickshire HMA (September 2015) informing the adopted Local Plan (2019), to 636dpa under the current standard methodology output), including the '*acute need for affordable housing*' (as referenced in the Updated Housing Needs Evidence for Rugby Borough (2025)) and wider economic growth ambitions.

2.2.7 National planning policy is also very clear that Plans should provide a positive vision for the future of an area which is underpinned by evidence. Further information is therefore required in order to ensure that the Objectives and Strategic priorities are justified and appropriately inform the new Local Plan.

2.2.8 The Objectives and Strategic priorities should therefore be reviewed and updated accordingly. This should include the addition of an Objective relating to housing delivery and further information to explain how the 'Objectives' and 'Strategic priorities' have been defined. The spatial strategy and site allocations should then in turn be identified to help respond to and address the Objectives and Strategic priorities to support the delivery of the Plan.

## 2.3 Summary

With reference to paragraph 36 of the NPPF (2024), the 'Objectives' and 'Strategic priorities' as currently set out do not meet the following tests of soundness:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

Accordingly, in order to ensure the soundness of the Plan, the following changes are recommended:

- The Plan should be updated to include an overarching Vision in order to provide a framework for meeting future needs and addressing priorities.
- The 'Objectives' and 'Strategic priorities' should be reviewed and informed by the Plan Vision.
- Further information is required to explain how the individual 'Objectives' and 'Strategic priorities' have been identified and how they relate to each other.
- An additional 'Objective' should be added relating to supporting housing delivery (including affordable housing).

## 3. Spatial Strategy

### 3.1 Introduction

- 3.1.1 Paragraph 1.1 of the Proposed Submission Local Plan (January 2026) introduces the proposed '*spatial strategy for development of homes and employment land in the borough in the period 2025-2042*', which is illustrated on the accompanying key diagram (page 11).
- 3.1.2 The supporting text that follows refers to various matters including the Council's housing and employment needs, requirements, overall spatial strategy and site allocations. These matters are therefore considered in turn below and also referenced under the subsequent relevant policies.

### 3.2 Response

#### General comments

- 3.2.1 In general this section of the Proposed Submission Local Plan (January 2026) (pages 9-11) does not follow a clear structure and there is a lack of detail and justification for the proposed '*spatial strategy*'.
- 3.2.2 In the first instance, in particular it is important for the Plan to explain the key characteristics of the area, geographical context and constraints and opportunities, in order to help inform the spatial strategy. The spatial strategy for accommodating new development should also be based on firstly establishing the level of need that needs for be planned for.
- 3.2.3 Whilst the Plan briefly explains the Council's local housing need and proposed housing requirement, there is however no background information or evidence to explain how the spatial strategy has then been informed or developed. Rather the Plan simply continues to factually state the overall number and proposed location of new site allocations. Importantly, there are also no details set out to explain the proposed approach towards the release of Green Belt land.
- 3.2.4 In contrast, for example, the adopted Local Plan (2019) (Chapter 2) includes a '*Portrait of Rugby Borough*' which provides contextual information regarding the local demographics, local economy and local environment.
- 3.2.5 The need for this approach is established in national planning policy in the NPPF (2024), which is clear that Plans should be informed by '*local circumstances*' in order to '*reflect the character, needs and opportunities of each area*' (paragraph 9).
- 3.2.6 Further information and restructuring of the Plan is therefore required in order to provide a clear evidence based justification for the proposed spatial strategy.

#### Plan period

- 3.2.7 Paragraphs 1.1 and 1.2 of the Proposed Submission Local Plan (January 2026) reference the Plan period 2025-2042 to which the proposed spatial strategy and housing requirement relate.
- 3.2.8 Paragraph 22 of the NPPF (2024) is clear that '*strategic policies should look ahead over a minimum 15 year period from adoption*'.
- 3.2.9 The Council's latest Local Development Scheme (LDS) (October 2024) sets out a target for submission of the Plan in June 2026 and adoption '*by June 2027*'. Whilst in this instance the adopted Plan would just cover the minimum 15-year period to the end date of 2042, the target timetable to adoption is considered to be very ambitious and unlikely to be achieved.
- 3.2.10 The length of time from Local Plan submission to adoption is usually longer than a year and typically 12-24 months or longer, depending on the complexity, evidence and modifications. Indeed in the neighbouring authorities, the Nuneaton and Bedworth Borough Plan Review was recently adopted in December 2025 following submission in February 2024 (i.e. almost 2 years later). The Coventry

Local Plan Review was submitted in early September 2025 and Examination hearings have only recently been scheduled for late March / April 2026 (i.e. over 6 months later), also indicating a potential lengthy Examination period.

- 3.2.11 Notably the previous Preferred Option Local Plan (March 2025) published at Regulation 18 stage proposed a Plan period to 2045. Interestingly some of the Council's evidence base (e.g. the Updated Housing Needs Evidence for Rugby Borough (September 2025) also already covers an extended Plan period (to 2043).
- 3.2.12 It appears that the decision to include a reduced Plan period to 2042 is based directly on the aim to avoid planning to meet longer-term housing needs. Indeed in the Officer's Report to Cabinet to consider the Proposed Submission Local Plan (6<sup>th</sup> January) it was made clear that a Plan period to 2042 is the '*shortest plan period that could be proposed*' and that reducing the Plan period from 2045 to 2042 would '*partly counteract the effect of the increase to Rugby Borough's minimum local housing*' and reduce the housing requirement by approximately 1,000 homes. It is clear therefore that the Council is not taking a positive approach towards planning for the future needs of the area (as required by the NPPF (2024) (paragraph 15)).
- 3.2.13 On this basis, it is considered that the Plan period should be extended now to at least 2043 in order to ensure a minimum 15-year Plan period and to support a positive approach towards planning for future needs, in line with national planning policy. The overall housing requirement should be updated accordingly and additional proposed site allocations considered to support needs over an extended Plan period.

### Overall housing need

- 3.2.14 Paragraph 1.2 of the Proposed Submission Local Plan (January 2026) (and further below at paragraph 1.20) refers to the Council's local housing need of 636 dwellings per annum (dpa) calculated based on the Government's standard method.
- 3.2.15 This acknowledgement aligns with the NPPF (2024) which is clear that the Government's standard method should be used to determine minimum local housing need (paragraph 62).
- 3.2.16 Notably, this is an increase from the previous assessment of housing need which informed the adopted Local Plan (2019) (480dpa in the Updated Assessment of Housing Need: Coventry-Warwickshire HMA (September 2015)) and from the previous standard method output (pre-December 2024) (525dpa). This is acknowledged in the Sustainability Appraisal (SA) (December 2025) (paragraph 2.2.4).
- 3.2.17 Whilst previous historic delivery in the borough has exceeded the revised standard method figure of 636dpa, this previous historic delivery has included a significant contribution to meeting Coventry's unmet housing need, as explained in the Updated Housing Needs Evidence for Rugby Borough (September 2025) (paragraph 3.53).
- 3.2.18 There are therefore clear increasing housing needs to be accommodated in the borough based on the current standard method.
- 3.2.19 An updated standard method output is likely to be published in spring 2026 which should also be considered in the ongoing preparation of the Plan.

### Housing Requirement

- 3.2.20 Paragraph 1.1 of the Proposed Submission Local Plan (January 2026) states that '*the housing requirement is set at local housing need calculated using the government's standard method.*'
- 3.2.21 Paragraph 62 of the NPPF (2024) is clear that, '*To determine the **minimum** number of homes needed, strategic policies should be **informed** by a local housing need assessment, conducted using the standard method in national planning guidance.*' [our emphasis]. The recent draft NPPF (December 2025) further emphasises the Government's focus on housing delivery.

- 3.2.22 Paragraph 69 of the NPPF (2024) adds that, *'The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.'*
- 3.2.23 The proposed housing requirement of 10,812 new homes (636dpa) seeks to meet the minimum housing requirement based on the current standard method output. There is however evidence which indicates that a higher housing requirement should be considered, taking into account potential unmet needs, economic growth, affordable housing and previous overall housing delivery, which are considered in turn below.
- The adopted Local Plan (2019) currently makes provision for unmet needs from Coventry. There is therefore an agreed existing relationship between the ability of Rugby to support Coventry's needs. Whilst Coventry is proposing to meet its local housing need in full in its submitted Local Plan Review (2025), it is important that the need for Rugby to make provision for any future unmet need from Coventry is kept under review as both Local Plans progress. This is acknowledged in the SA (December 2025).
  - With regards to economic growth, the Proposed Submission Local Plan (January 2026) identifies key objectives focused on supporting economic growth in the borough and plans for significant new employment land. Indeed the SA (December 2025) acknowledges that the delivery of a *'high employment growth strategy is a clear option for the Local Plan'*. This follows a period of 'weaker' and 'below average' economic growth in the borough since 2001 and a trend of in-commuting, as explained in the Housing and Economic Development Needs Assessment (HEDNA) (November 2022) (paragraphs 2.6 and 2.43). Whilst the Homes – Jobs Alignment Paper (December 2025) indicates a broad alignment between homes and jobs based on the standard method, a more positive approach to supporting additional housing would likely further ensure future economic growth.
  - With regards to affordable housing needs, the Updated Housing Needs Evidence for Rugby Borough (2025) concludes that there is *'an acute need for affordable housing'* and identifies a net need for affordable housing of 338dpa for those unable to buy or rent. The Council's Annual Monitoring Reports (AMRs) show that there has been persistent under-delivery of affordable housing delivery against this identified need previously, with supply being below this identified need for each of the past 5 monitoring years. Importantly the SA (December 2025) (paragraph 5.2.10) explains that, *'a housing requirement set at LHN would not provide for affordable housing need in full'*. Accordingly, on this basis and given the current 'acute need' for affordable housing, there is a clear need for an overall increased housing requirement in order to help facilitate increased affordable housing provision. This should also be included in the overall Local Plan 'Objectives' as explained above.
  - In addition, with regards to previous housing delivery rates, the Development Needs Topic Paper (December 2025) shows that overall annual delivery has averaged 688.5 dwellings during the adopted Plan period to date from 2011/12 to 2024/25, in excess of the current standard method output of 636dpa. It is clear that the borough can therefore accommodate higher housing growth (in notable contrast with other areas where housing delivery has fallen far below the standard method). In addition, notwithstanding this, a higher housing requirement (with additional site allocations) is also necessary to ensure deliverability moving forward given that the Council cannot currently demonstrate a 5-year housing land supply for the period 2025/26 to 2029/30 (as acknowledged in the Council's latest published 5-Year Housing Land Supply Position Statement 2025-2030, where the Council conclude that only 4.16 years supply can be demonstrated at 1 April 2025). Overall, given the Government's overall emphasis on housing delivery (as referred to above), as well as the need to support economic growth and affordable housing needs, it is clear that a positive approach towards growth should be continued and the future housing requirement should not be artificially constrained based directly on meeting the minimum assessed local housing need.

- 3.2.24 For the reasons set out above, and notwithstanding our view that the Plan period should be lengthened, it is considered that an increased housing requirement per annum should be applied in order to help meet the Council's identified needs and priorities and to support the delivery of the Plan.

### **Spatial Strategy**

- 3.2.25 Paragraphs 1.3-1.7 of the Proposed Submission Local Plan (January 2026) summarise the Council's proposed spatial strategy for accommodating the housing requirement.

- 3.2.26 Paragraph 1.7 of the Proposed Submission Local Plan (January 2026) explains that:

*'Overall, the plan diversifies the location and size of housing sites, which were in previous local plans focussed on urban extensions to Rugby, to better reflect the borough's mix of town and rural locations. This will secure more affordable housing (delivery of which has historically been weak) due to higher house prices and stronger development viability in rural parts of the borough.'*

- 3.2.27 Taking into account existing commitments, the proposed spatial strategy includes some additional allocations at Rugby and at a number of the borough's 'main rural settlements'. Indeed new housing allocations are proposed for only 1,233 (43%) additional new homes at Rugby, compared with 1,653 (57%) new homes at the borough's rural settlements which *'mostly lie within the Green Belt'* (paragraph 1.5). There is however no reference made to the proposed approach towards grey belt land.

- 3.2.28 The overall aim of the NPPF (2024) is to support sustainable development and to encourage new development to be directed to sustainable locations. In this regard, the Council's evidence base documents (as summarised below) clearly identify Rugby as the most sustainable location in the borough which is able to accommodate future growth, based on its services and facilities, sustainable connections, land availability, affordable housing needs. The Local Plan 'Objectives' (notwithstanding our comments above) are also clearly directed towards supporting Rugby town – including objectives to: 'Support the diversification and growth of Rugby Borough's economy in sustainable locations' and 'Support the revival of Rugby town centre'.

- 3.2.29 The Council's proposed spatial strategy to spread growth across the borough is not evidence-based or justified, as required by the NPPF (2024), and is not supported. Instead there is a clear evidence-based need to focus growth at Rugby (including at the Site), as per the Council's relevant evidence base documents referred to further below:

- Spatial Strategy and Site Selection Methodology Summary (December 2025);
- HELAA (October 2025);
- Urban Capacity Study (November 2025);
- Stage 2 Site Options Assessment (December 2025);
- Sustainability Appraisal (December 2025);
- Green Belt Exceptional Circumstances Topic Paper (December 2025);
- Green Belt Contribution Study: Stage 1 Strategic Assessment (October 2025);
- Green Belt Contribution Study: Stage 2 Site Contribution Assessments (December 2025);
- Updated Housing Needs Evidence for Rugby Borough (September 2025);
- Local Plan Viability Study (December 2025); and
- Transport Network Analysis Methodology Note (February 2025).

### **Housing land availability**

- 3.2.30 The Spatial Strategy and Site Selection Methodology Summary (December 2025) summarises the steps taken to inform the spatial strategy, including the stages of the site selection process and the development of reasonable alternative spatial strategy options (through the HELAA (Stage 1a), Urban Capacity Study (Stage 1b), detailed site assessment (Stage 2a) and Sustainability Appraisal (Stage 2b).

- 3.2.31 This overall methodology is supported however it is unclear how the outputs of this evidence-base work have been used to inform the proposed spatial strategy.

- 3.2.32 Specifically, each of these evidence reports identified the development potential of land at and around Rugby; however, these conclusions do not appear have fully influenced the spatial strategy.
- 3.2.33 The HELAA (2025) (Figure 2) is clear that from previous consultation stages, the *'potential broad locations for housing development'* identified are predominantly located at and around Rugby. The HELAA (2024) itself then assessed a total of 261 sites and identified a significant number of sites at and around Rugby for further assessment (HELAA (2025) Appendix 5).
- 3.2.34 Notably the HELAA (2025) made the following conclusions regarding the Site at Land at Brownsover Road, Rugby (ref. 102) and identified the site for further assessment:
- "Available – Yes - immediately*
- Achievable – Yes*
- Suitable – Potentially"*
- 3.2.35 The Urban Capacity Study (UCS) (November 2025) complements the HELAA by identifying additional potential capacity for new residential development within the Rugby urban area, beyond the sites included in the HELAA. The study identified 20 sites as being suitable, (potentially/likely) viable, and available, of which 11 sites are proposed for allocation. The UCS highlights the brownfield land opportunities at Rugby as well as the constraints to accommodating development within the urban area alone.
- 3.2.36 The subsequent Stage 2 Site Options Assessment (December 2025) provided a more detailed assessment of 120 potential sites (including sites at Rugby and across the borough) identified through the HELAA (2025) and UCS (November 2025). 28 sites were identified for allocation with the remainder 'not progressed'. However, notably a number of assessed sites at Rugby (including the Site at Brownsover Road (ref. 102)) were 'not progressed' despite positive assessments.
- 3.2.37 The assessment conclusions for the Site at Brownsover Road (ref. 102) are copied below.
- "The site consists of a pastoral field enclosed by trees, hedgerows and the Oxford Canal.*
- The surrounding road network has medium levels of congestion. **The site ranks well for connectivity, accessibility and PTAL overall, however Warwickshire County Council have raised concerns about the absence of suitable pedestrian access to Newbold on Avon village given the narrow and weak canal bridge on Brownsover Road which has no footway.***
- Neither ecology or heritage constraints have been flagged, and the landscape sensitivity is Medium/Low.***
- The site is within the Green Belt, but the stage 2 Green Belt study identifies it as provisionally grey belt.*
- In view of the lack of suitable pedestrian access, the site is not progressed."*
- [our emphasis]
- 3.2.38 It appears that the Site has been discounted based on general concerns regarding pedestrian access alone, without having regard to any potential mitigation and despite the many other benefits acknowledged.
- 3.2.39 Indeed importantly, the Stage 2 Site Options Assessment (December 2025) (page 8) acknowledges in regards to the Council's assessment, that, *'while providing an indication of accessibility in the general location, it may miss site-specific accessibility constraints and opportunities'*. In this regard, as referred to above, work by Miller Homes demonstrates that a safe and suitable pedestrian access can be delivered from Brownsover Road via improvements to Green's Bridge (as shown at Drawing No. 110952 PEF ZZ XX DR C 0100 (Appendix D)).
- 3.2.40 The Council's flawed assessment therefore in turn appears to have informed the spatial strategy without taking full consideration of the suitability of the Site to support housing needs in a sustainable

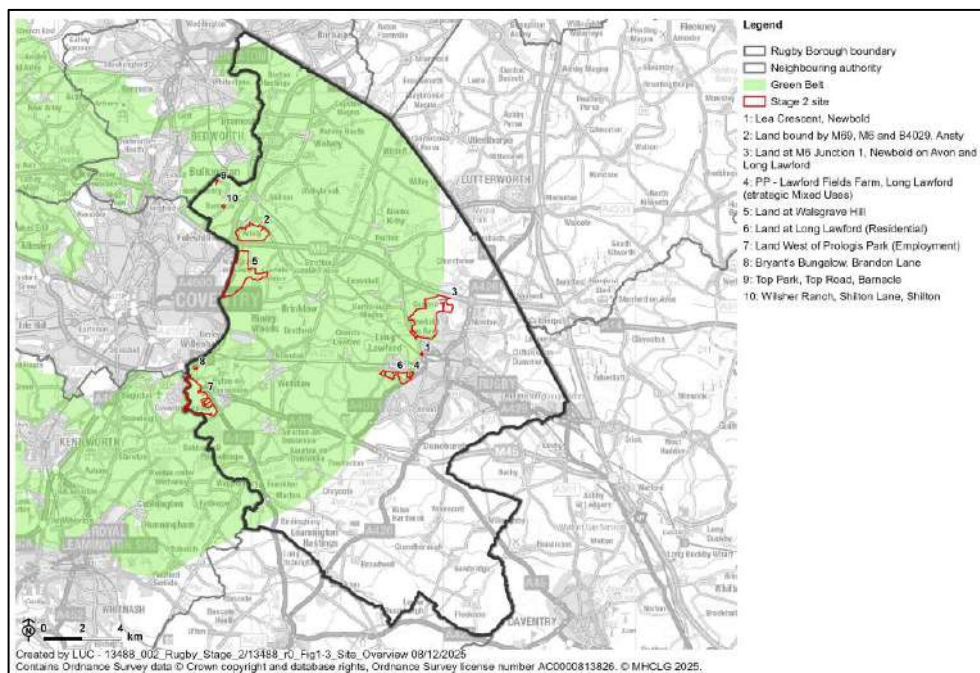
location. Similarly other potential sites at Rugby have also been ‘not progressed’ in the Stage 2 assessment in the same way, whilst sites at rural settlements have been proposed for allocation.

3.2.41 Overall the Council’s above evidence shows that there is additional suitable land available at Rugby which should be considered further to inform the proposed spatial strategy.

**Green Belt**

3.2.42 The Green Belt Exceptional Circumstances Topic Paper (December 2025) provides exceptional circumstances justification for the removal of land from the Green Belt in the Local Plan, based on paragraphs 145-148 of the NPPF (2024). The Council’s case for exceptional circumstances is separated by the different types of potential Green Belt release including in relation to housing needs. In this regard, the Council explain that it has sought to use as much brownfield land as possible (as per the Urban Capacity Study) and emphasises the opportunities and benefits of using Green Belt land, including in relation to affordable housing delivery and speeding up housing delivery. On this basis the Council’s overall exceptional circumstances case is considered to be justified in line with the NPPF (2024) (notwithstanding some concerns below regarding the approach towards the specific location of the proposed site allocations).

3.2.43 The exceptional circumstances justification follows the Council’s Green Belt Contribution Study: Stage 1 Strategic Assessment (October 2025) and Green Belt Contribution Study: Stage 2 Site Contribution Assessments (December 2025). The Stage 1 assessment identified broad areas within which land could potentially be identified as grey belt, based on land which does not make a strong contribution to the Green Belt purposes A, B or D in the NPPF (2024). The subsequent Stage 2 provided more detailed analysis of 10 more defined areas (including 4 adjacent to Rugby and 6 adjacent to the boundary with Coventry) as shown below. The Site at Brownsver Road was assessed as parcel ref. NB03 within the area no.3 below.



3.2.44 The Stage 2 assessment concluded that a number of parcels around Rugby could be identified as ‘potential grey belt’ (as shown below), including the Site (NB03, part of area 3 above), as well as the adjacent parcel NB02 and the site at Lea Crescent, Newbold (LE01, part of area 1 above).

Parcel Ref	Site	Potential grey belt?	Area (ha)
NB 01	Site 114: Land at M6 Junction 1, Newbold on Avon and Long Lawford	No	212.18
NB 02	Site 114: Land at M6 Junction 1, Newbold on Avon and Long Lawford	Yes	45.16
NB 03	Site 114: Land at M6 Junction 1, Newbold on Avon and Long Lawford	Yes	8.81
LF 01	Site 253: Lawford Fields Farm, Long Lawford	No	26.57
LF 02	Site 253: Lawford Fields Farm, Long Lawford	No	12.42
LL 01	Site 316: Land at Long Lawford	No	50.92
WL 01	Site 121: Land at Walsgrave Hill	No	179.16
WL 02	Site 121: Land at Walsgrave Hill	Yes	23.00
CF 01	Site 95: Land at Crowner Fields Farm and Home Farm	No	109.13
CF 02	Site 95: Land at Crowner Fields Farm and Home Farm	Yes	9.53
PR 01	Site 328: Land at Prologis Park West	No	127.08
PR 02	Site 328: Land at Prologis Park West	No	23.23
PR 03	Site 328: Land at Prologis Park West	Yes	14.22
PR 04	Site 328: Land at Prologis Park West	No	38.22
PR 05	Site 328: Land at Prologis Park West	Yes	60.45
TP 01	Top Park, Top Road, Barnacle	Yes	1.90
LE 01	Lea Crescent, Newbold	Yes	1.97
BB 01	Bryant's Bungalow, Brandon Lane	Yes	1.93

3.2.45 It is clear therefore that Green Belt land adjacent to Rugby, including the Site, could be identified as grey belt land and could therefore contribute to supporting local housing needs in a sustainable location. This land should therefore be prioritised for development prior to the release of Green Belt land at the borough's rural settlements.

**Affordable housing needs**

3.2.46 The Council seek to justify the proposed spatial strategy on the basis that it *'will secure more affordable housing'* (Paragraph 1.7 of the Proposed Submission Local Plan (January 2026)). This rationale is however also questioned.

3.2.47 The Updated Housing Needs Evidence for Rugby Borough (September 2025) illustrates that existing social housing stock is located predominantly at and around Rugby (Figure 5.1) and that similarly locations at and around Rugby are the most popular for rented housing (e.g. paragraphs 3.43, 3.47). This evidence report also explains that the Council is *'progressing development on two Town Centre regeneration projects at Navigation Way and Rounds Gardens. These projects are central to increasing affordable housing supply and revitalising the Town Centre'* (paragraph 5.15). It is clear therefore that affordable housing need and supply are focused towards Rugby town. The logic to diversity the spatial strategy towards more rural settlements to support affordable housing provision is therefore questionable.

3.2.48 This approach also fails to acknowledge the opportunities and benefits of greenfield, and in particular grey belt, land given the additional uplift in affordable housing required on these sites (based on the provisions of the NPPF (2024) (as well as required improvements to infrastructure and green spaces under the 'Golden Rules'). The Local Plan Viability Study (December 2025) (paragraphs 7.4-7.5) explains that from the appraisals undertaken, Green Belt sites should be able to deliver an increased proportion of affordable housing, compared with the challenges of providing sufficient affordable housing at strategic sites.

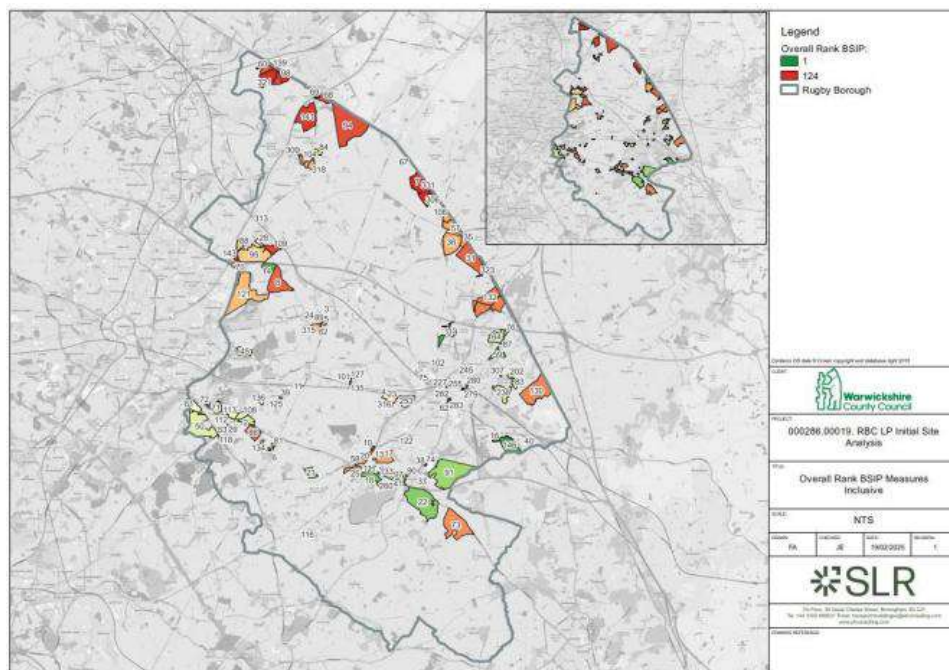
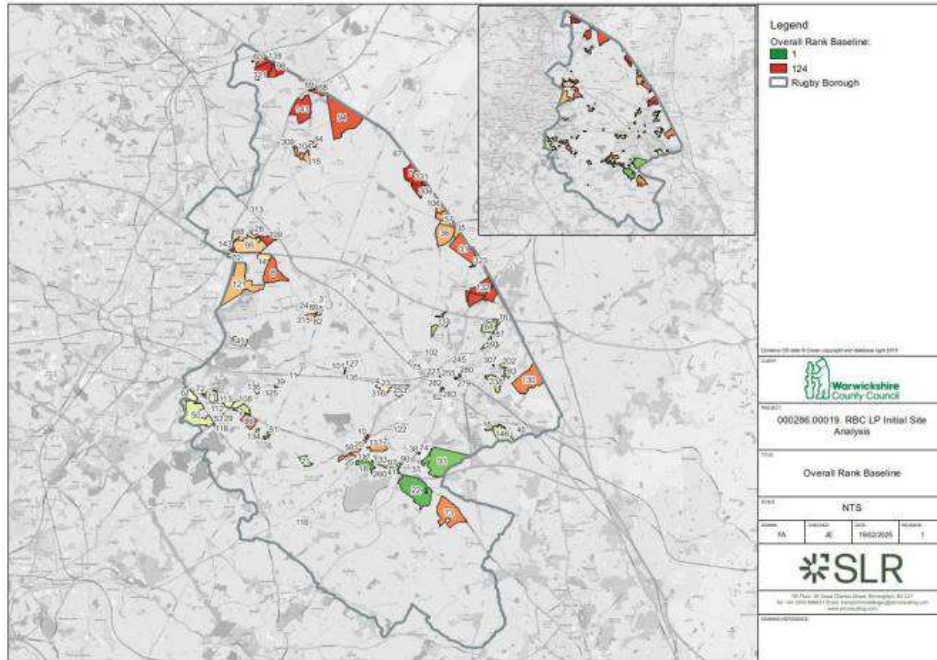
**Transport**

3.2.49 The Council's transport evidence base includes the Transport Network Analysis Methodology Note (February 2025) (a precursor to the Strategic Transport Assessment (December 2025)), which comprised *'an initial assessment of the transport network implications resulting from the delivery of development sites identified by RBC through the Local Plan 'Call for Sites' process'*.

3.2.50 The assessment included an analysis of 124 sites which were classified based on their location within or around Rugby or the rural area. The results presented within section 6 of the assessment clearly show that the sites within and around Rugby score most positively throughout, including at a baseline

level and taking into account potential improvement measures (as shown by the spread of green colours around Rugby on the extracts below).

- 3.2.51 Notably, Appendix A (Site-by-Site Overall Accessibility Rank Comparison) ranks the Site at Brownsover Road very positively as 15<sup>th</sup> (Baseline Rank) and 7<sup>th</sup> (BSIP Rank) of the total 124 sites assessed.



**Reasonable alternatives**

- 3.2.52 The SA (December 2025) (paragraph 5.4.16) considers potential reasonable alternatives to the spatial strategy and notably acknowledges that:

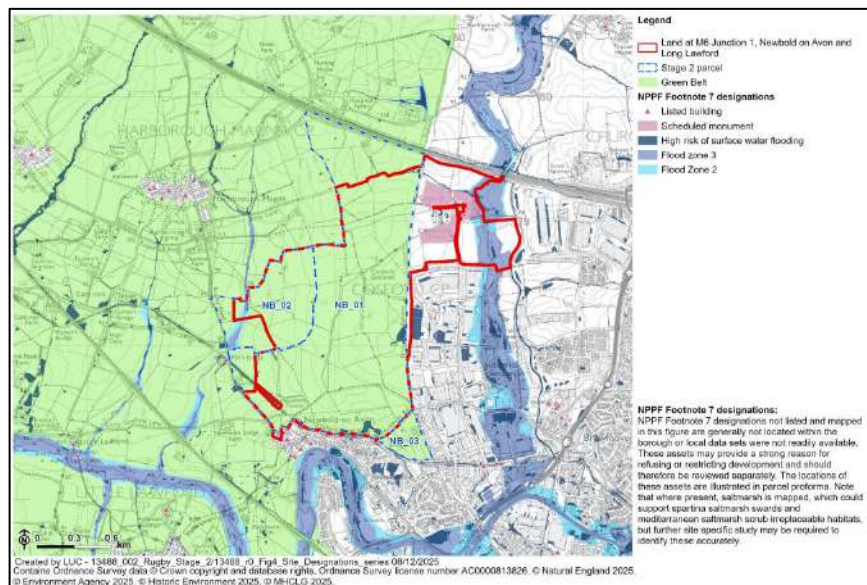
*'there is a need to consider higher growth involving allocation of one or more omission sites, given Rugby's position in the settlement hierarchy and notwithstanding the high level of commitments.'*

3.2.53 On this basis, the SA (December 2025) (paragraph 5.4.23) then defines four ‘reasonable growth scenarios’ for the settlement of Rugby as follows:

- ‘1) The proposed submission approach (18 allocations for 1,258 homes)
- 2) Scenario 1 plus the two Hillmorton sites (1,533 homes in total)
- 3) Scenario 1 plus the North West Rugby (2,458 homes in total)
- 4) Scenario 1 plus the two Hillmorton sites and NW Rugby (2,733 homes in total)’

3.2.54 Notably the four ‘reasonable growth scenarios’ do not appear to fully take into account the findings of the Council’s evidence base work (as referred to above) including in relation to overall land availability, potential grey belt land, affordable housing needs, viability and transport. The ‘reasonable growth scenarios’ are based specifically on considering five omission sites, which were either draft allocations at the Draft Plan stage (March 2025) or subject to detailed assessment.

3.2.55 This includes consideration of the North West Rugby strategic urban extension (Site 114), adjacent to the Site (as shown below from the Green Belt Contribution Study: Stage 2 Site Contribution Assessments (December 2025)), which is assessed as a ‘reasonable alternative’ for 1,200 homes in the Plan period. (Site 114 was assessed as parcels NB01 and NB02 in the Stage 2 Site Contribution Assessments (December 2025) and the adjacent Site was assessed as parcel NB03). The SA (December 2025) (paragraph 5.4.22) explains that the omission sites assessed (including Site 114) are ‘those that are best performing such that there is limited pressure to consider further omission sites’.



3.2.56 The SA (December 2025) (Table 6.1) shows that some of the higher growth scenarios assessed at Rugby (e.g. Scenario 3, including Site 114) score relatively similar to the proposed submission approach (Scenario 1). This indicates that there is justification for a higher growth scenario to be considered. However, it is considered that the assessed growth scenarios should be revised to include specific consideration of individual sites such as Land at Brownsover Road, Rugby.

3.2.57 Notably, with regards to Site 114, the SA (December 2025) (paragraph 5.4.21) explains that ‘there is now considered to be a reduced case for allocation’, on the basis of the quantum of development, viability and as ‘the site mostly does not comprise grey belt’. However, importantly the Site at Brownsover Road, adjacent to Site 114, was identified as ‘potential grey belt’ in the Council’s Green Belt Contribution Study: Site Contribution Assessments (December 2025) (parcel ref. NB 03). The HELAA (December 2025) also concluded that the Site is ‘available’, ‘achievable’ and ‘potentially suitable’ for a potential yield of 150 units. It is clear therefore that the Site has the potential to contribute to Rugby’s growth needs and should be subject to specific assessment in the SA (December 2025)

**Summary**

- 3.2.58 Taking into account the SA (December 2025) together with the wider evidence base (including the Green Belt Contribution Study: Strategic Assessment (October 2025) and Site Contribution Assessments (December 2025)), there is therefore a clear evidence base which justifies a higher growth approach at Rugby, including through the release of Green Belt land. The current approach of the proposed spatial strategy to ‘diversify’ the location of new housing across the borough and ‘better reflect the borough’s mix of town and rural locations’ does not however reflect the Council’s evidence base and is not consistent with national planning policy. The proposed spatial strategy will also impact on the ability to meet the current identified Local Plan ‘Objectives’.
- 3.2.59 On the basis of the above, given the relative sustainability of Rugby, the spatial strategy should be revised to ensure that Rugby continues to be prioritised as the focus for additional growth in the borough.
- 3.2.60 In doing so, the Council should consider additional allocations at Rugby, including on grey belt land, to support meeting local needs in a sustainable location. This should include consideration of Land at Brownsover Road, Rugby which comprises suitable and available grey belt land (as acknowledged in the Council’s evidence base) to accommodate new residential development.

**3.3 Summary**

With reference to paragraph 36 of the NPPF (2024), the proposed spatial strategy, plan period and housing requirement within the Proposed Submission Local Plan (January 2026) do not meet the following tests of soundness:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

Accordingly, in order to ensure the soundness of the Plan, the following changes are recommended:

- Further information and restructuring of the Plan is required in order to provide a clear evidence based justification for the proposed spatial strategy.
- The Plan period should be extended to at least 2043 in order to ensure a minimum 15-year Plan period and to support a positive approach towards planning for future needs, in line with national planning policy. The overall housing requirement should be updated accordingly and additional proposed site allocations considered to support needs over an extended Plan period.
- The proposed housing requirement per annum should be increased in order to help meet the Council’s identified needs and priorities and to support the delivery of the Plan.
- The Stage 2 Site Options Assessment (November 2025) should be reviewed and updated in regards to Land at Brownsover Road, Rugby, having regard to the work undertaken by Miller Homes which demonstrates that a safe and suitable pedestrian access can be delivered via improvements to Green’s Bridge (Drawing No. 110952 PEF ZZ XX DR C 0100) (Appendix D).
- The Sustainability Appraisal (December 2025) should be updated to include an additional ‘reasonable growth scenario’ for Rugby which includes the ‘potential grey belt’ land at Brownsover Road, Rugby.
- The spatial strategy should be revised to ensure that Rugby continues to be prioritised as the focus for additional growth in the borough. In doing so, the Council should consider additional allocations at Rugby, including at Grey Belt land, such as at Land at Brownsover Road, Rugby which comprises suitable and available Grey Belt land (as acknowledged in the Council’s evidence base) to accommodate new residential development.

## 4. Policy S1: Settlement Hierarchy

### 4.1 Introduction

- 4.1.1 Policy S1 sets out a settlement hierarchy to guide new development in the borough. This includes Rugby town as the *'main focus for new homes and employment'* (Tier i), followed by a number of *'main rural settlements'* (tier ii) and then a number of *'other rural settlements'* (tier iii). Paragraph 1.15 adds that, *'The settlement hierarchy seeks to direct development to those locations with services and facilities.'*
- 4.1.2 The supporting text to Policy S1 seeks to explain and illustrate the spatial strategy for development based on a summary of the Council's housing and employment needs, which are also referenced and considered under Policies S2 and S3 referred to below.

### 4.2 Response

- 4.2.1 The overall proposed approach of the settlement hierarchy, that Rugby town *'will be the main focus for new homes and employment'*, is supported.
- 4.2.2 Within the borough, Rugby is the largest settlement which provides the greatest number and range of housing and employment opportunities together with amenities including shopping, education, entertainment and leisure. The town is also well-connected to other towns and cities by road, rail and bus networks, including via the M1 / M6 and Rugby Railway Station, which provides fast services to Coventry, Birmingham and London, in addition to more local services. The Council's evidence base further emphasises the sustainability credentials of Rugby as referred to in section 2 of this report.
- 4.2.3 The overall aim of the NPPF (2024) is to support sustainable development and to encourage new development to be directed to sustainable locations. The identification of Rugby in the settlement hierarchy as the *'main focus for new homes and employment'* is therefore an appropriate justified strategy in accordance with the Council's evidence base and the NPPF (2024). This approach will also help to achieve the Local Plan *'Objectives'* (notwithstanding our comments above) which include to, *'Support the diversification and growth of Rugby Borough's economy in sustainable locations'* and to *'Support the revival of Rugby town centre'*.
- 4.2.4 Supporting paragraph 1.15 adds that *'the settlement hierarchy seeks to direct development to those locations with services and facilities'*. However, importantly this approach does not appear to be reflected in the spatial strategy for accommodating new development, as explained above, which includes proposed allocations for only 1,233 (43%) additional new homes at Rugby, compared with 1,653 (57%) new homes at the borough's rural settlements (paragraph 1.5).
- 4.2.5 The settlement hierarchy should work and be consistent with the spatial strategy in order that growth is distributed based upon the relative role, function and sustainability of each settlement. It is important therefore that the spatial strategy and location for new development is based upon the settlement hierarchy in order to be justified and effective in accordance with national planning policy.
- 4.2.6 On this basis, as explained above, given the evidence-based approach to Rugby in Tier I of the settlement hierarchy, the spatial strategy should be revised to ensure that Rugby continues to be prioritised as the focus for additional growth in the borough.

## 4.3 Summary

With reference to paragraph 36 of the NPPF (2024), Policy S1 (Settlement Hierarchy) together with the proposed spatial strategy (pages 9-11) do not meet the following tests of soundness:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

Accordingly, in order to ensure the overall soundness of the Plan, the following changes are recommended:

- In order to ensure consistency with the settlement hierarchy, the spatial strategy should be revised to ensure that Rugby continues to be prioritised as the focus for additional growth in the borough.

## 5. Policy S2: Strategy for Homes

### 5.1 Introduction

5.1.1 Policy S2 sets out a strategy for accommodating future housing needs during the Plan period 2025-2042, through commitments, existing allocations, new allocations and windfall sites. This is based on a proposed housing requirement of 10,812 new homes, based on the Government's standard method.

### 5.2 Response

5.2.1 The overall strategy for accommodating future housing needs during the Plan period 2025-2042 includes a significant focus on the existing commitments at South West Rugby (3,505 homes), Houlton (3,060 homes) and Eden Park (602 homes), which include a total provision of 7,167 new homes (67% of the total housing requirement). New allocations are proposed within the Proposed Submission Local Plan (January 2026) for a total of 2,886 dwellings under Policy S6 (below), comprising 1,233 additional new homes at Rugby and 1,653 new homes at the borough's rural settlements (as referred to above).

5.2.2 The supporting text to Policy S2 acknowledges that, *'Much of the housing growth to meet this need is already committed through the Houlton, South West Rugby and Eden Park sites which will continue to be built out during the plan period'* (Paragraph 1.21).

5.2.3 The NPPF (2024) encourages Plans to include a sufficient mix of sites, taking into account a range of factors including availability, suitability and viability, in order to maintain housing supply and to support a range of local needs. This includes a need to support both larger-scale development and small and medium sites, as per paragraphs 73 and 77 of the NPPF (2024). Paragraph 73 of the NPPF (2024) states that, *'Small and medium sized sites can make an **important contribution** to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are **often built-out relatively quickly**'* [our emphasis].

5.2.4 The role of delivery at large strategic sites is understood and recognised. However, a reliance on strategic sites to support meeting the vast majority of the borough's housing needs is a risky approach to maintaining sufficient supply, having regard to factors such as phased lead-in times, infrastructure dependencies, viability, affordable housing and market absorption for example – and is contrary to advice in the NPPF. It is therefore necessary to ensure that delivery at large strategic sites is sufficiently supported by smaller sites in order to assist with overall delivery. This is particularly important given the Council's current inability to demonstrate a 5-year housing land supply (as acknowledged in the Council's latest published 5-Year Housing Land Supply Position Statement 2025-2030).

5.2.5 Indeed the Council's evidence base highlights particular issues in this regard already experienced from the strategic urban extensions to Rugby. The SA (December 2025) explains that, *'a previous strong focus on supply from strategic urban extensions to Rugby has led to issues...Specifically, there have been unforeseen delays to delivery that have impacted the Borough's ability to maintain a five year housing land supply and the sites in question have all faced viability challenges such that ability to deliver affordable housing, alongside delivering on wider requirements, has been severely limited (e.g. Houlton is delivering zero affordable)'* (paragraph 5.2.41).

5.2.6 Furthermore, the Housing Trajectory (Appendix 1) of the Proposed Submission Local Plan (January 2026) highlights that delivery at Houlton is not expected to peak until 2028/29 (265 units) and delivery at South West Rugby is not expected to peak until 2031/32 (338 units) (almost halfway through the Plan period). The Trajectory also shows that South West Rugby will deliver 3,050 homes (not 3,505 homes as stated in Policy S2) and that both South West Rugby and Houlton will not be delivered in full during the Plan period to 2042. Further, at South West Rugby, Appendix 1 (Housing Commitments) of the Development Needs Topic Paper (December 2025) highlights that a number of applications relating to a significant amount of future supply are still to be determined or even submitted.

- 5.2.7 The total trajectory shows that, as a result of the above, the annual housing requirement (636dpa) will not be met until 2029/30 (5 years in the to the Plan period). Indeed as above this informs the Council's current inability to demonstrate a 5-year housing land supply (as acknowledged in the Council's latest published 5-Year Housing Land Supply Position Statement 2025-2030), and thereby further highlights the need for smaller sites to assist in meeting housing needs within the first 5 years of the Plan.
- 5.2.8 The Council's Infrastructure Delivery Schedule (IDS) (December 2025) also highlights the extent of strategic infrastructure which is 'critical' to the South West Rugby and Houlton developments. The IDS (December 2025) notably details no 'scheme status' or 'total cost' for a number of strategic infrastructure items indicating further uncertainty regarding the delivery of infrastructure necessary to support these schemes.
- 5.2.9 This overall highlights the potential implications of reliance on these strategic sites towards supporting the borough's housing needs, and the need therefore for a greater mix of sites to be identified for allocation within the Plan.
- 5.2.10 Paragraph 1.22 of the Proposed Submission Local Plan (December 2025) explains that, '*Supply is allocated for 8.5% more than the minimum requirement as a buffer to increase the likelihood of the council being able to continually demonstrate a five-year housing land supply.*' Whilst the inclusion of a buffer to the supply is appropriate, based on national planning policy, this is considered to be a relatively low proportion given the overall reliance on several strategic sites and the greater 17.5% supply buffer in the adopted Local Plan, and especially given the Council's current 5-year housing land supply position (referred to above). Furthermore this does not appear to support the Council's stated aim to continually demonstrate a five-year housing land supply, given the current position and noting that, for example, the annual housing requirement (636dpa) will not be met until 2029/30 (5 years in the to the Plan period) as referred to above.
- 5.2.11 It is considered therefore that an increased buffer should be applied through the allocation of additional sites (to include Land at Brownsover Road, Rugby) in order to help provide certainty of ongoing delivery to support local housing needs.

### 5.3 Summary

With reference to paragraph 36 of the NPPF (2024), Policy S2 (Strategy for homes) of the Proposed Submission Local Plan (January 2026) does not meet the following tests of soundness:

- Justified;
- Effective; and
- Consistent with national policy.

Accordingly, in order to ensure the soundness of the Plan, the following changes are recommended:

- Policy S2 table – reference should be made to an increased number of 'Allocations under Policy S6' (to include for the allocation of Land at Brownsover Road, Rugby) in order to provide an increased buffer to supply.
- Supporting paragraph 1.22 – should be updated to reference an increased supply buffer, based upon an increased number of allocations (including the allocation of Land at Brownsover Road, Rugby).

## 6. Policy S5: Countryside Protection

### 6.1 Introduction

- 6.1.1 Policy S5 (part A) states that, *'Outside of the settlement boundaries shown on the policies map, new development will only be permitted where it is in accordance with a policy of this plan which supports development in such locations.'* Part B explains that national Green Belt policy will be applied to the Green Belt areas shown on the policies map.

### 6.2 Response

- 6.2.1 The overall proposed approach to apply national Green Belt policy to development proposals in the Green Belt is noted. This approach helps to ensure a clear policy which avoids unnecessary duplication with national planning policy, in accordance with paragraph 16 of the NPPF (2024). However in doing so, it is important that the Council follows recent national planning policy changes relating to grey belt land (e.g. paragraphs 148 and 155-159 of the NPPF (2024)), in order to inform the preparation of the Plan, including site selection (as explained further in sections 2 and 7 of this report) and the determination of submitted development proposals. It is notable also that the current draft NPPF (December 2025) proposes to remove the current footnote 7 considerations in so far as they are relevant to determining whether land comprises grey belt.
- 6.2.2 For clarity, it is recommended that the supporting text to Policy S5 also provides cross-reference to the spatial strategy and the proposed approach towards grey belt and Green Belt release, based on the exceptional circumstances justification (as set out in the Green Belt Exceptional Circumstances Topic Paper (December 2025)).

### 6.3 Summary

In order to ensure the soundness of the Plan, with reference to paragraph 36 of the NPPF (2024) the following changes are recommended:

- In applying national Green Belt policy, the Council should follow recent national planning policy changes relating to grey belt land in order to inform the preparation of the Plan, including site selection, and the determination of submitted development proposals.
- Policy S5 supporting text – cross-reference made to the spatial strategy and the proposed approach towards grey belt and Green Belt release, based on the exceptional circumstances justification (as set out in the Green Belt Exceptional Circumstances Topic Paper (December 2025)).

# 7. Policy S6: Residential Allocations

## 7.1 Introduction

7.1.1 Policy S6 lists out the residential sites which are proposed to be allocated for development. This includes the proposed allocation of 12 Green Belt sites (as detailed in the Green Belt Exceptional Circumstances Topic Paper (December 2025)) but excludes the Site at Land at Brownsover Road, Rugby.

## 7.2 Response

7.2.1 Further to the comments made above, and based on the Council's evidence base, it is considered that the residential sites proposed for allocation should be reviewed and that Policy S6 should be updated to include the allocation of Land at Brownsover Road, Rugby. This is necessary to ensure that the Plan is justified and effective in accordance with paragraph 36 of the NPPF (2024).

7.2.2 The majority of allocations proposed under Policy S6 are located at the borough's rural settlements (1,653 (57%) new homes) which 'mostly lie within the Green Belt', compared with only 1,233 (43%) additional new homes at Rugby (Proposed Submission Local Plan (December 2025), paragraph 1.5). As explained in section 2 above, the Council's proposed spatial strategy and approach to site allocations across the borough is not evidence-based or justified, as required by the NPPF (2024), and is not supported.

7.2.3 Instead there is a clear evidence-based need to focus growth at Rugby, through a mix of sites including grey belt land, based on the assessments made within evidence base documents including the HELAA (2025), Urban Capacity Study (2025), Stage 2 Site Options Assessment (2025), Green Belt Contribution Study (December 2025), Updated Housing Needs Evidence for Rugby Borough (September 2025) and Sustainability Appraisal (2025). There is therefore an overall need to review the sites proposed for allocation under Policy S6 on this basis.

7.2.4 Specifically, the proposed approach to allocate a number of sites within the Green Belt under Policy S6 is not justified based directly on the Council's evidence, as summarised below, for example:

- Land at Long Lawford (ref. 316) – 400 units. The Stage 2 Site Options Assessment (2025) and Green Belt Contribution Study: Stage 2 Site Contribution Assessments (December 2025) identify that the site makes a 'strong' contribution to Green Belt purpose A and C and *'does not have the potential to be grey belt land'*.
- Lawford Fields Farm, Long Lawford (ref. 253) – 250 units. The Stage 2 Site Options Assessment (2025) and Green Belt Contribution Study: Stage 2 Site Contribution Assessments (December 2025) identify that the site makes a 'strong' contribution to Green Belt purpose A and C and *'does not have the potential to be grey belt land'*. The Stage 2 Site Options Assessment (2025) adds that *'Green Belt is a concern for the site'* and that *'development would coalesce Rugby and Long Lawford contributing to the sprawl of the Rugby built-up area'*.
- Oakdale Nursery, Brandon (adj Binley Woods) (ref. 54) – 43 units. The site was initially discounted in the HELAA (December 2025) due to *'Unsustainable location separated from settlement edge also ecology concerns as significant areas of woodland on site.'* However the site (with an amended boundary) was identified as a 'proposed site allocation' in the Stage 2 Site Options Assessment (2025), despite the assessment acknowledging that the majority of the site is located within the Green Belt performing a 'strong' contribution to purpose A (thereby not comprising grey belt) and C and a 'moderate' contribution to purpose B. The site was also not subject to a specific detailed assessment within the Green Belt Contribution Study: Stage 2 Site Contribution Assessments (December 2025).

- West Farm and Home Farm, Brinklow (ref. 337) – 75 units. The site comprises two sites (refs. 5 and 89) which have not been subject to a combined assessment, as noted in the Stage 2 Site Options Assessment (2025). The Stage 2 Site Options Assessment (2025) notes that both individual sites (refs. 5 and 89) are subject to constraints including ‘relatively weak’ / ‘relatively poor’ accessibility, ‘medium ecological constraints’ and ‘heritage sensitivity needs careful consideration’. The site/s were also not subject to a specific detailed assessment within the Green Belt Contribution Study: Stage 2 Site Contribution Assessments (December 2025).
- Land south of Rugby Road, Brinklow (ref. 315) – 250 units. The Stage 2 Site Options Assessment (2025) identifies that the site has ‘relatively weak’ accessibility and connectivity and ‘greater potential heritage sensitivities’. The site was not subject to a specific detailed assessment within the Green Belt Contribution Study: Stage 2 Site Contribution Assessments (December 2025).

7.2.5 On the basis of the above, it is clear that a number of sites are proposed for allocation despite performing a ‘strong’ contribution to Green Belt purposes and not comprising grey belt land, as well as being subject to a number of other identified constraints.

7.2.6 Whilst the Council has set out exceptional circumstances for the release of Green belt land for development, the NPPF (2024) is clear that, when doing so, priority should be given to considering ‘grey belt’ land ahead of other Green Belt locations, as per paragraph 148 of the NPPF (2024):

*‘Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.’*

7.2.7 This sequential approach has however not been followed by the Council, given that other suitable grey belt sites exist (such as the Site at Brownsover Road) as explained further below. Accordingly, the proposed approach to allocate these sites under Policy S6 is therefore not justified or consistent with the Council’s evidence base and contrary to the NPPF (2024).

***Land at Brownsover Road, Rugby***

7.2.8 In contrast to a number of sites proposed for allocation, the Site at Brownsover Road Rugby is assessed favourably as a potential development site within the Council’s evidence base.

7.2.9 The Site was previously identified for release from the Green Belt in the Publication Draft Local Plan 2011-2031 (September 2016). Paragraph 4.30 of the Publication Draft Local Plan 2011-2031 (September 2016) explained that:

*‘Land at Brownsover Road is not considered to serve the purposes of the Green Belt and this designation has therefore been removed and the Green Belt boundary amended accordingly’.*

7.2.10 The Local Plan Inspector subsequently concluded that *exceptional circumstances do not exist to justify altering the Green Belt specifically as it was not required to meet the Council’s housing needs at the time. However, the Council’s housing needs have subsequently increased and the Council has set out exceptional circumstances for the release of Green Belt land to accommodate development through the Plan.*

7.2.11 Notably, the Site (ref. 102) was recently assessed in the HELAA (December 2025) as ‘available’, ‘achievable’ and ‘potentially suitable’ for a potential yield of 150 units.

7.2.12 The Green Belt Contribution Study: Stage 2 Site Contributions Assessment (December 2025) (December 2025) also concludes that the Site (parcel ref. NB03) could be identified as ‘potential grey belt’ (subject to consideration of NPPF (2024) footnote 7), based on only a ‘Moderate’ contribution to Purpose A, a ‘Moderate’ contribution to Purpose B and a ‘Weak/No’ contribution to Purpose D of the Green Belt. With regards to footnote 7 of the NPPF (2024), the Site itself is not subject to the relevant designations listed and therefore it is considered that the provisions of footnote 7 of the NPPF (2024) would not provide a ‘strong reason for restricting’ proposed development. It is also noted that the

draft NPPF (December 2025) proposes to remove the current footnote 7 considerations in so far as they are relevant to determining whether land comprises grey belt.

- 7.2.13 Furthermore, the Stage 2 Site Options Assessment (2025) provides a positive assessment for the Site at Brownsover Road (ref. 102) as below.

*“The site consists of a pastoral field enclosed by trees, hedgerows and the Oxford Canal.*

*The surrounding road network has medium levels of congestion. **The site ranks well for connectivity, accessibility and PTAL overall, however Warwickshire County Council have raised concerns about the absence of suitable pedestrian access to Newbold on Avon village given the narrow and weak canal bridge on Brownsover Road which has no footway.***

***Neither ecology or heritage constraints have been flagged, and the landscape sensitivity is Medium/Low.***

***The site is within the Green Belt, but the stage 2 Green Belt study identifies it as provisionally grey belt.***

*In view of the lack of suitable pedestrian access, the site is not progressed.”*

[our emphasis]

- 7.2.14 The Council’s transport evidence also assesses the Site favourably. Appendix A (Site-by-Site Overall Accessibility Rank Comparison) of the Transport Network Analysis Methodology Note (February 2025) ranks the Site as 15th (Baseline Rank) and 7th (BSIP Rank) of the total 124 sites assessed.
- 7.2.15 It appears that the Site has been discounted based only on general concerns regarding pedestrian access alone, without having regard to any potential mitigation and despite the many other benefits acknowledged. Indeed the Stage 2 Site Options Assessment (December 2025) (page 8) acknowledges in regards to the Council’s assessment, that, *‘while providing an indication of accessibility in the general location, it may miss site-specific accessibility constraints and opportunities’*. The approach to the assessment of the Site however appears to contrast with the assessment of the proposed site allocations where mitigation is taken into account in the Council’s assessment work.
- 7.2.16 Importantly in regards to the Council’s conclusion relating to *‘the lack of suitable pedestrian access’*, as referred to above, work by Miller Homes demonstrates that a safe and suitable pedestrian access can be delivered from Brownsover Road via improvements to Green’s Bridge (as shown at Drawing No. 110952 PEF ZZ XX DR C 0100 (Appendix D)).
- 7.2.17 Accordingly, on the basis of the above and given the Site is acknowledged to meet the criteria for grey belt, it is considered that the Site should be allocated for residential development to support Rugby’s future growth.
- 7.2.18 The accompanying proposed Land Use Plan (Drawing No. 06) (Appendix B) and Illustrative Framework Plan (Drawing No. Ai01A) (Appendix C) further demonstrate how the Site could accommodate a sustainable, well-connected, landscape-led addition to Rugby, that delivers much needed new high-quality homes for the town.
- 7.2.19 Specifically it is anticipated that proposals at the Site could deliver:
- Provision for approximately 4.6 hectares net developable area of residential development within a new and enhanced landscaped setting;
  - A dedicated vehicular access proposed off Brownsover Road;
  - Enhanced connectivity with the existing Viaduct Cycleway;
  - Dedicated active travel and recreational routes through the development, allowing for high quality pedestrian and cyclist permeability;
  - Provision of outward-facing development parcels ensuring visual interest and high levels of natural surveillance of the public realm, including a positive frontage towards the Viaduct Cycleway;

- Opportunity to deliver varied character through the design of streets and varied density, with a higher density and more urban character towards the north-east, relating to the adjacent industrial area and a lower density edge and looser character towards the Oxford Canal;
- A new open, tranquil green space opposite the Newbold Quarry Nature Reserve, linking to a green corridor through the centre of the Site;
- Provision for a dedicated local area of play within the landscaped public open space;
- A green buffer to the Oxford Canal and a multifunctional area of green space for biodiversity and recreational benefits. This could include new species rich grassland (wildflower meadows), informal paths and a series of tree groups, woodland edge (scrub) and individual trees. This would create a naturalistic area of green space to assist with biodiversity gains and informal recreation.
- Enhancement of trees and hedgerows through the Site and towards the Site boundaries, including new planting, hedges and trees to reinforce the existing landscape;
- Buffers to existing trees and hedgerows;
- Compliance with current biodiversity net gain legislation, through enhancing biodiversity on site and offsetting mitigation measures as necessary; and
- New dwellings to be of a design and style in-keeping with the local area's urban form, materiality and local character.

### 7.3 Summary

With reference to paragraph 36 of the NPPF (2024), Policy S6 (Residential allocations) of the Proposed Submission Local Plan (January 2026) does not meet the following tests of soundness:

- Justified; and
- Effective.

Accordingly, in order to ensure the soundness of the Plan, the following changes are recommended:

- Land at Brownsver, Rugby should be included as an allocation for residential development.

## 8. Chapter 5: Environment Policies

### 8.1 Introduction

8.1.1 Chapter 5 of the Proposed Submission Local Plan (January 2026) includes the following draft policies of particular relevance which are considered in turn below.

- Policy EN1: Biodiversity and Geodiversity Protection;
- Policy EN2: Landscape Protection;
- Policy EN5: Biodiversity Net Gain;
- Policy EN7: Flood Risk.

### 8.2 Policy EN1: Biodiversity and Geodiversity Protection

8.2.1 Policy EN1 seeks to apply the mitigation hierarchy (avoid, mitigate, compensate), protect designated sites, recognises irreplaceable habitats and support ecological networks, and thereby reflects the overall provisions of chapter 15 of the NPPF (2024).

8.2.2 It is important to ensure that Policy EN1 is applied so as to not introduce constraints that undermine the spatial strategy and the delivery of new development. Proposed site allocations should be informed by relevant ecological evidence.

### 8.3 Policy EN2: Landscape Protection

8.3.1 Policy EN2 as currently worded is considered to be generic and overly restrictive towards precluding any development. In this regard it is unclear whether the purpose of the policy is to protect all landscapes or to be focused on protecting the best or most valued landscapes of the borough. It should also be acknowledged that the development of any greenfield site is likely to have a degree of landscape impacts.

8.3.2 It is recommended that the policy also includes some requirement for or acknowledgement of mitigation. This would encourage more robust and thorough approaches to development proposals which integrate landscape as an inherent part of the process.

8.3.3 Part C conflates matters of landscape with heritage which should be addressed under Policy D4 for clarity and to avoid unnecessary duplication of policies as per the NPPF (2024).

### 8.4 Policy EN5: Biodiversity Net Gain

8.4.1 Policy EN5 requires measurable biodiversity net gain, reflects use of the national biodiversity metric, secures gains for a minimum 30-year period and follows the established delivery hierarchy (on-site, off-site, statutory credits). Policy EN5 is therefore considered to align with national policy and the statutory Biodiversity Net Gain regime introduced through the Environment Act 2021.

8.4.2 It is important to ensure that Policy EN5 is applied taking into account other policy requirements so as to facilitate the delivery of new development.

## 8.5 Policy EN7: Flood Risk

- 8.5.1 Policy EN7 as currently worded is not consistent with the NPPF (2024) and recent PPG guidance as it includes a broad requirement for a sequential test for all applications within areas at high or medium risk of flooding. The NPPF (2024) is however more specific and states that the sequential test requirement should not be required where ‘*a site-specific flood risk assessment demonstrates that no built development... would be located on area that would be at risk of flooding...*’. The policy should instead defer to national planning policy requirements to ensure clarity and avoid duplication.

## 8.6 Summary

With reference to paragraph 36 of the NPPF (2024), Policies EN2 and EN7 the Proposed Submission Local Plan (January 2026) do not meet the tests of soundness.

Accordingly, in order to ensure the soundness of the Plan, the following changes are recommended:

- **Policy EN2** – the policy wording should be updated and clarified to be less restrictive towards new development, include acknowledgement for mitigation and omit reference to heritage.
- **Policy EN7** – the policy wording should be updated to clarify that the sequential test and exceptional test should be undertaken in accordance with national planning policy.

## 9. Chapter 6: Housing Policies

### 9.1 Introduction

9.1.1 Chapter 6 of the Proposed Submission Local Plan (January 2026) includes the following draft policies of particular relevance which are considered in turn below.

- Policy H1 – Housing Mix;
- Policy H2: Affordable Housing;
- Policy H6: Specialist Housing; and
- Policy H7: Housing Standards.

### 9.2 Policy H1: Mix

9.2.1 Policy H1 requires developments to contribute to meeting the housing needs of the borough based on the Housing Needs Evidence (2025) 'and any other appropriate local evidence'. The policy therefore seeks to ensure that the housing mix responds to identified needs with a degree of flexibility taking into account other evidence or changing circumstances which is welcomed.

### 9.3 Policy H2: Affordable Housing

9.3.1 It is notable that Policy H2 requires a greater proportion of affordable housing to be delivered on sites in the Green Belt. This approach should inform the spatial strategy and approach towards site selection having regard to the acute need for affordable housing referred to above.

9.3.2 The policy should also be worded to ensure consistency with national planning policy relating to the development of land in the Green Belt including the application of the Golden Rules.

9.3.3 With regards to paragraph 6.7, whilst the 'different financial model' of built to rent housing is acknowledged, further clarification should be provided regarding the affordable housing sought on such schemes.

### 9.4 Policy H7: Housing Standards

9.4.1 Policy H7 requires all new development to meet M4(2) standards and all new major developments to provide 3.5% of units to meet M4(3) standards, based on the recommendation of the Updated Housing Needs Evidence for Rugby (2025).

9.4.2 This is likely to be a challenging requirement in some instances depending on site-specific circumstances, design and viability for example. Indeed the Council's Viability Study (December 2025) (paragraph 6.23 and Tables 6.19.1 to 6.19.6) highlights that these requirements will have a '*modest downwards impact on residual land values*', with the greatest impact on larger residential sites. Furthermore, the draft NPPF (December 2025) (Policy HO5) states that Plan should ensure that 40% of new housing is delivered to M4(2) standards.

9.4.3 A flexible approach should therefore be allowed for within the policy wording on this basis, taking account of site-specific circumstances, design and viability, and having regard to the direction of travel of national planning policy.

## 9.5 Summary

In order to ensure the soundness of the Plan, with reference to paragraph 36 of the NPPF (2024) the following changes are recommended to Policies H2 and H7:

- **Policy H2** – the approach towards affordable housing should inform the spatial strategy and approach towards site selection. The policy should be worded to ensure consistency with national planning policy relating to the development of land in the Green Belt including the application of the Golden Rules.
- **Policy H7** – the policy wording should be updated to allow for a more flexible approach towards meeting M4(2) standards.

# 10. Chapter 8: Design Policies

## 10.1 Introduction

10.1.1 Chapter 8 of the Proposed Submission Local Plan (January 2026) includes the following draft policies of particular relevance which are considered in turn below.

- Policy D3: Landscaping;
- Policy D4: Historic Environment; and
- Policy D5: Sustainable Drainage

## 10.2 Policy D3: Landscaping

10.2.1 As an overarching point, Policy D3 includes a number of brief requirements and some further clarification and elaboration would assist in clarifying the overall purpose and intentions of the requirements sought. This policy should be consistent with Policy EN2 relating to landscape protection in particular.

10.2.2 For example, it is considered that part E requires further clarification and rewording to separate out requirements relating to hard landscaping and soft landscaping for instance.

10.2.3 It is also unclear whether this policy is fully coordinated with other strategic and development management policies to facilitate the delivery of identified sites, for example in requiring proposals to 'integrate landscape from the outset, and be landscape led' (part A).

## 10.3 Policy D4: Historic Environment

10.3.1 The overall provisions of Policy D4 are considered to be consistent with the NPPF (2024).

10.3.2 It is however important to ensure that the approach to support 'development that sustains and enhances the significance of heritage assets and their settings' (part B and paragraph 8.13) is considered on an overall basis having regard to the aims of other policies and the need to facilitate new development (for example if some heritage elements are enhanced and other heritage elements are lost).

## 10.4 Policy D5: Sustainable Drainage

10.4.1 The overall provisions of Policy D5 are considered to be consistent with the NPPF (2024).

10.4.2 However, the proposed requirements relating to SuDS under part B of the policy are not all established in national planning policy. The policy wording should therefore be revised from setting out firm 'Development shall...' requirements, in order to provide some flexibility to respond to site-specific circumstances and to thereby help facilitate new development.

## 10.5 Summary

In order to ensure the soundness of the Plan, with reference to paragraph 36 of the NPPF (2024) the following changes are recommended to Policies D3, D4 and D5:

- **Policy D3** – the policy wording should be reviewed in order to clarify the overall purpose and intentions of the requirements and to ensure consistency with Policy EN2 and other policies. Part E should be reworded to separate out requirements relating to hard landscaping and soft landscaping.
- **Policy D4** – the approach to support ‘development that sustains and enhances the significance of heritage assets and their settings’ should be considered on an overall basis having regard to the aims of other policies and the need to facilitate new development.
- **Policy D5** – the proposed requirements relating to SuDS under part B of the policy should be revised from firm ‘Development shall...’ requirements in order to allow some flexibility to take into account site-specific circumstances and to help facilitate new development.

# 11. Chapter 9: Infrastructure Policies

## 11.1 Introduction

11.2 Chapter 9 of the Proposed Submission Local Plan (January 2026) includes the following draft policies of particular relevance which are considered in turn below.

- Policy I1: Transport; and
- Policy I4: Infrastructure and Planning Obligations.

## 11.3 Policy I1: Transport

11.3.1 The overall provisions of Policy I5 are considered to be consistent with the NPPF (2024).

11.3.2 However, the policy wording should be revised from setting out firm 'Development shall...' requirements, in order to provide some flexibility to respond to site-specific circumstances and to thereby help facilitate new development.

## 11.4 Policy I4: Infrastructure and Planning Obligations

11.4.1 The overall policy is aligned with the NPPF (2024) in seeking to ensure that new development is supported by appropriate infrastructure.

11.4.2 It will however be important to ensure that any planning obligations sought, based on Policy I4, meet the tests set out in paragraph 58 of the NPPF (2024), which states that, '*Planning obligations must only be sought where they meet all of the following tests:*

- a) necessary to make the development acceptable in planning terms;*
- b) directly related to the development; and*
- c) fairly and reasonably related in scale and kind to the development.'*

11.4.3 The supporting text to Policy IN4 is clear that adequate infrastructure capacity is 'essential' to accommodating new development (paragraph 9.10). Accordingly, to ensure the soundness of the Plan, in accordance with paragraph 36 of the NPPF (2024), it is important to ensure that development is planned for in sustainable locations across a mix of sites based on the settlement hierarchy (i.e. including a focus on growth at Rugby as the most sustainable settlement in the borough).

## 11.5 Summary

In order to ensure the soundness of the Plan, with reference to paragraph 36 of the NPPF (2024) the following changes are recommended to Policies I1 and I4:

- **Policy I1** – the policy wording should be revised from firm 'Development shall...' requirements in order to allow some flexibility to take into account site-specific circumstances and to help facilitate new development.
- **Policy I4** – the policy should be clear that any planning obligations sought should meet the tests set out in paragraph 58 of the NPPF (2024).

## 12. Conclusion

- 12.1 These representations demonstrate that the Proposed Submission Local Plan (January 2026) does not currently meet the NPPF (2024) tests of soundness of being positively prepared, justified, effective, or consistent with national policy.
- 12.2 Collectively the absence of an overarching Vision, the constrained Plan period, the reliance on the minimum local housing need figure, and a spatial strategy that is not sufficiently focused towards Rugby undermines the robustness of the Plan.
- 12.3 The Council's own evidence identifies Land at Brownsover Road as 'available', 'achievable' and 'potentially suitable' for development and as 'potential grey belt' land. Indeed the Site is assessed more favourably than other proposed site allocations. The only identified constraint (pedestrian access) is capable of being resolved through improvements to Green's Bridge which is demonstrated on Drawing No. 110952 PEF ZZ XX DR C 0100 (Signalised Crossing Over Canal Bridge) (Appendix D).
- 12.4 Given Rugby's position as the borough's most sustainable settlement and the need for both market and affordable housing, the Site represents a suitable and appropriate location to accommodate growth.
- 12.5 To ensure the soundness of the Plan, the spatial strategy should be revised to direct a greater proportion of development to Rugby, and Land at Brownsover Road should be allocated to support meeting the borough's needs and the overall Plan objectives.

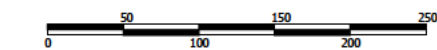
# Appendix A – Site Location Plan (Drawing No. 01)

Revision Note: -

Notes:



 Site Boundary



**Status:** PLANNING

**Client Name & Project Number:**  
158649.8  
Miller Homes Ltd

**Project title:**  
Brownsover Road,  
Rugby

**Drawing title:**  
Site Location Plan

Scale: 1:5,000@A3	Drawing no.: 01	Revision: -
Drawn by: SM	Checked by: MS	Date: 18.12.26

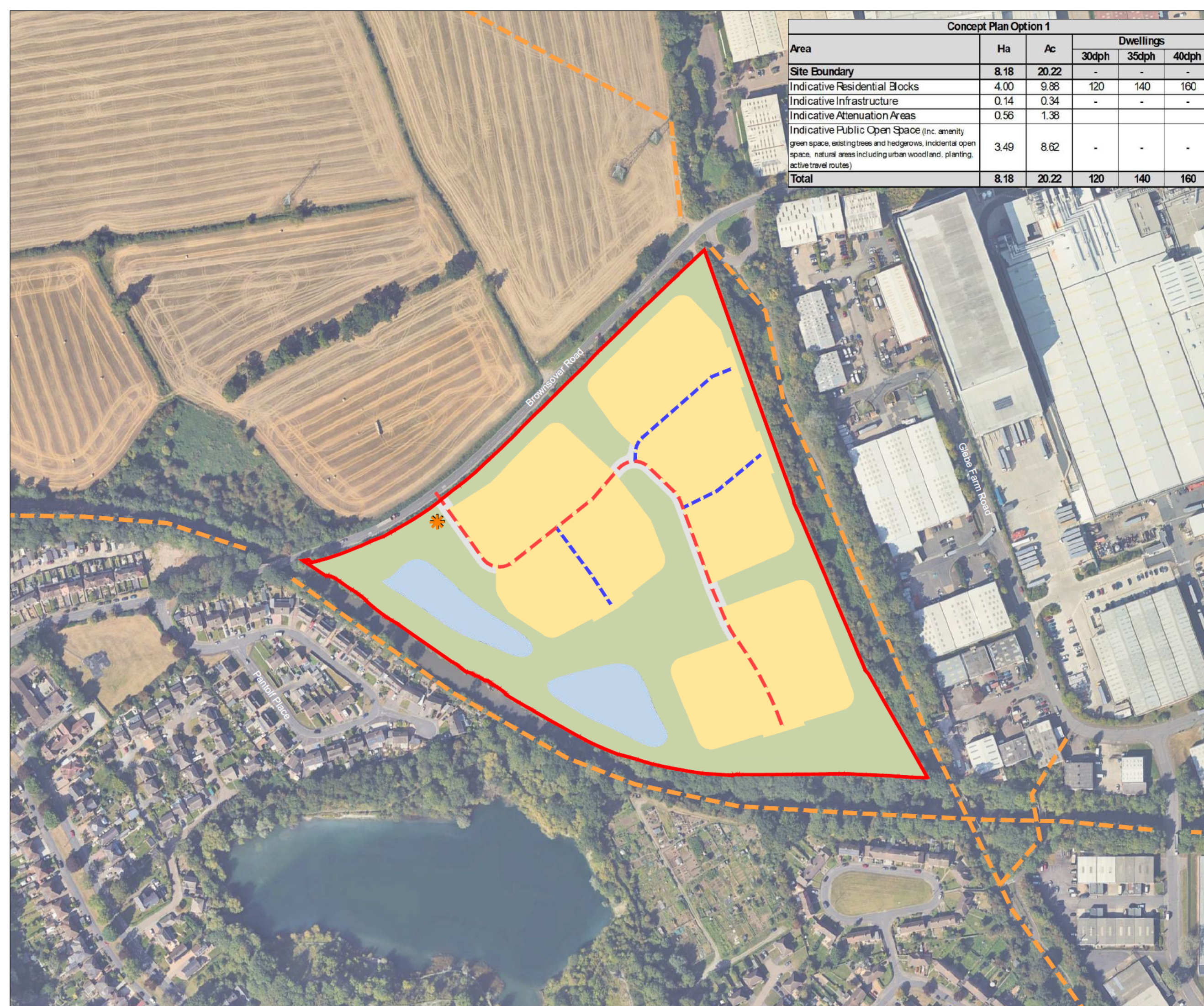


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# Appendix B – Proposed Land Use Plan (Drawing No. 06)



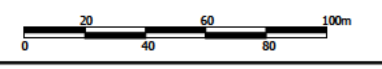
Concept Plan Option 1					
Area	Ha	Ac	Dwellings		
			30dph	35dph	40dph
<b>Site Boundary</b>	<b>8.18</b>	<b>20.22</b>	-	-	-
Indicative Residential Blocks	4.00	9.88	120	140	160
Indicative Infrastructure	0.14	0.34	-	-	-
Indicative Attenuation Areas	0.56	1.38	-	-	-
Indicative Public Open Space (Inc. amenity green space, existing trees and hedgerows, incidental open space, natural areas including urban woodland, planting, active travel routes)	3.49	8.62	-	-	-
<b>Total</b>	<b>8.18</b>	<b>20.22</b>	<b>120</b>	<b>140</b>	<b>160</b>

Revision Note: -

Notes: **DRAFT**



- Site Boundary
- Public Rights of Way
- Indicative Primary Route
- Indicative Secondary Routes
- Indicative Residential Blocks
- Indicative Public Open Space ((Inc. amenity green space, existing trees and hedgerows, incidental open space, natural areas including urban woodland, planting, active travel routes))
- Indicative Attenuation Areas
- Potential Pumping Station



**Status:** PLANNING

**Client Name & Project Number:** 1586649.8  
Miller Homes Ltd

**Project title:** Brownsover Road,  
Rugby

**Drawing title:** Land Use Plan (Based on Ai01)

Scale: 1:2,500@A3	Drawing no.: 06	Revision: -
Drawn by: SM	Checked by: MS	Date: 08.01.26



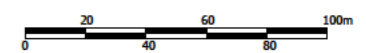
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# Appendix C – Illustrative Framework Plan (Drawing No.Ai01A) (Appendix C)

Notes:  
**DRAFT**



- Key**
- Site Boundary
  - ➔ Primary Access
  - ➔ Potential Pedestrian / Cycle Links
  - ▬▬▬ Key Movement Route
  - ▬▬▬ Secondary Movement Routes
  - ▭▭▭ Indicative Residential Blocks
  - ▭▭▭ Indicative Attenuation Basin
  - ▭▭▭ Indicative Play Areas
  - ▭▭▭ Retained & Enhanced Vegetation
  - ⋯⋯⋯ Pedestrian / Cycle Trails
  - ⋯⋯⋯ Public Rights of Way
  - ★ Potential Pumping Station



**Status:** PLANNING

**Client Name & Project Number:**  
 1586649.8  
 Miller Homes Ltd

**Project title:**  
 Brownsover Road,  
 Rugby

**Drawing title:**  
 Illustrative Framework Plan

Scale: 1:2,500@A3	Drawing no.: AI01	Revision: A
Drawn by: SM	Checked by: MS	Date: 08.01.26

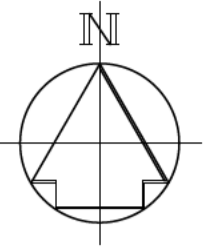


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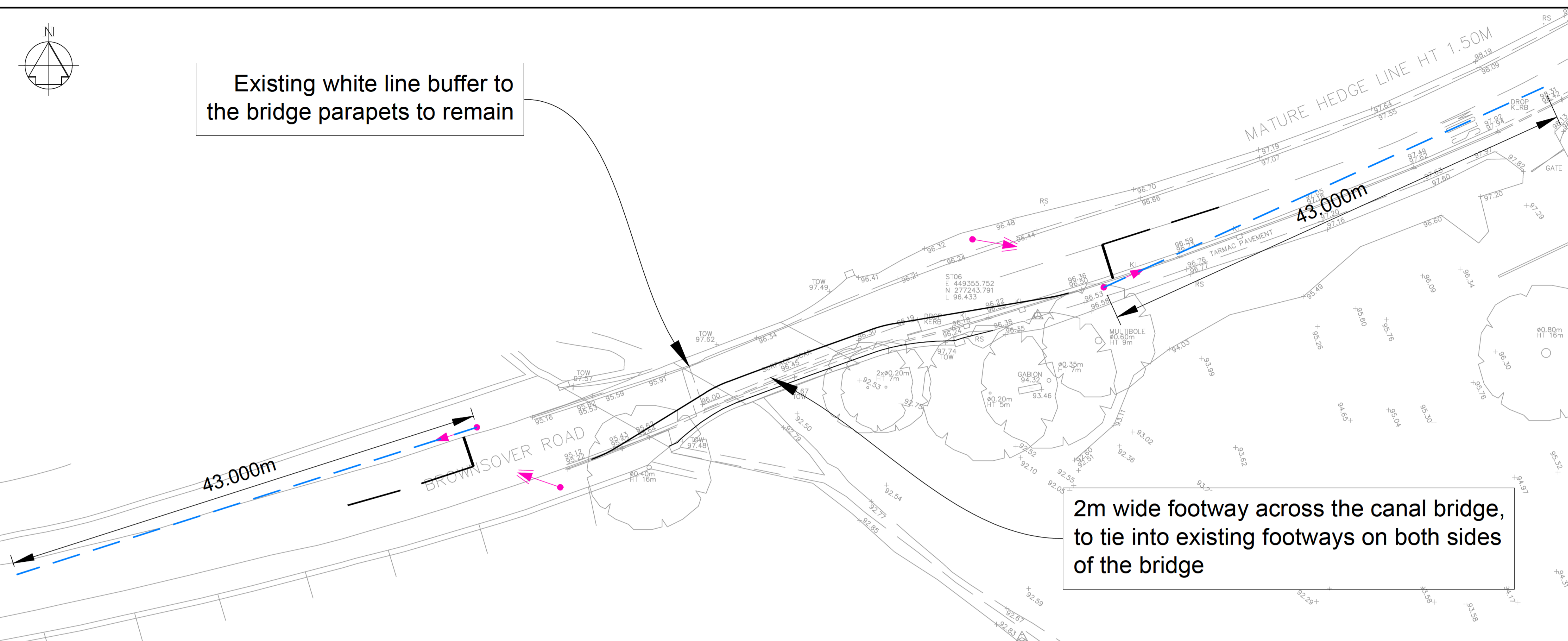
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# **Appendix D – Potential Highways Improvements Plan (Drawing No. 110952 PEF ZZ XX DR C 0100 (Signalised Crossing Over Canal Bridge))**

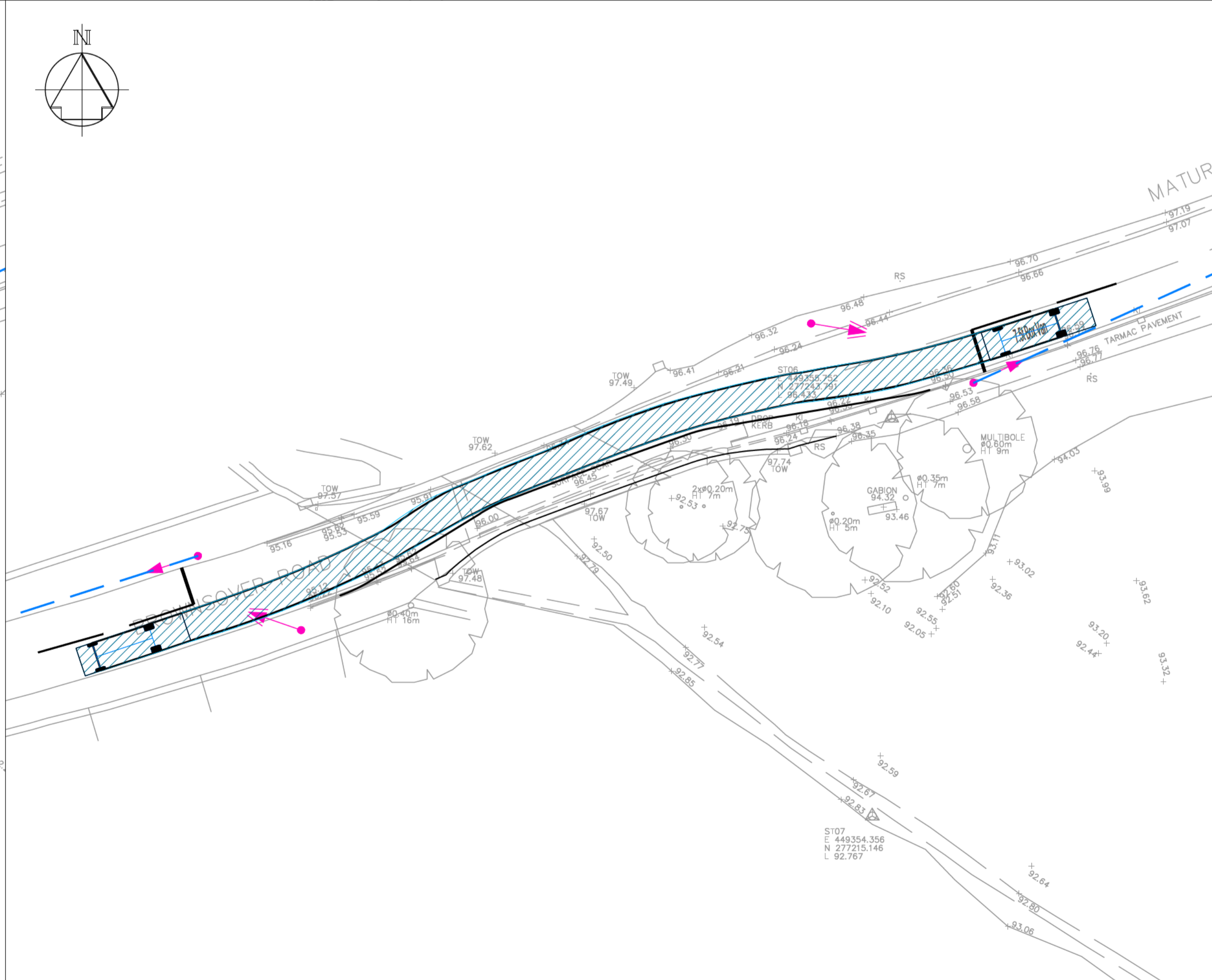
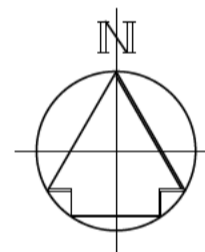
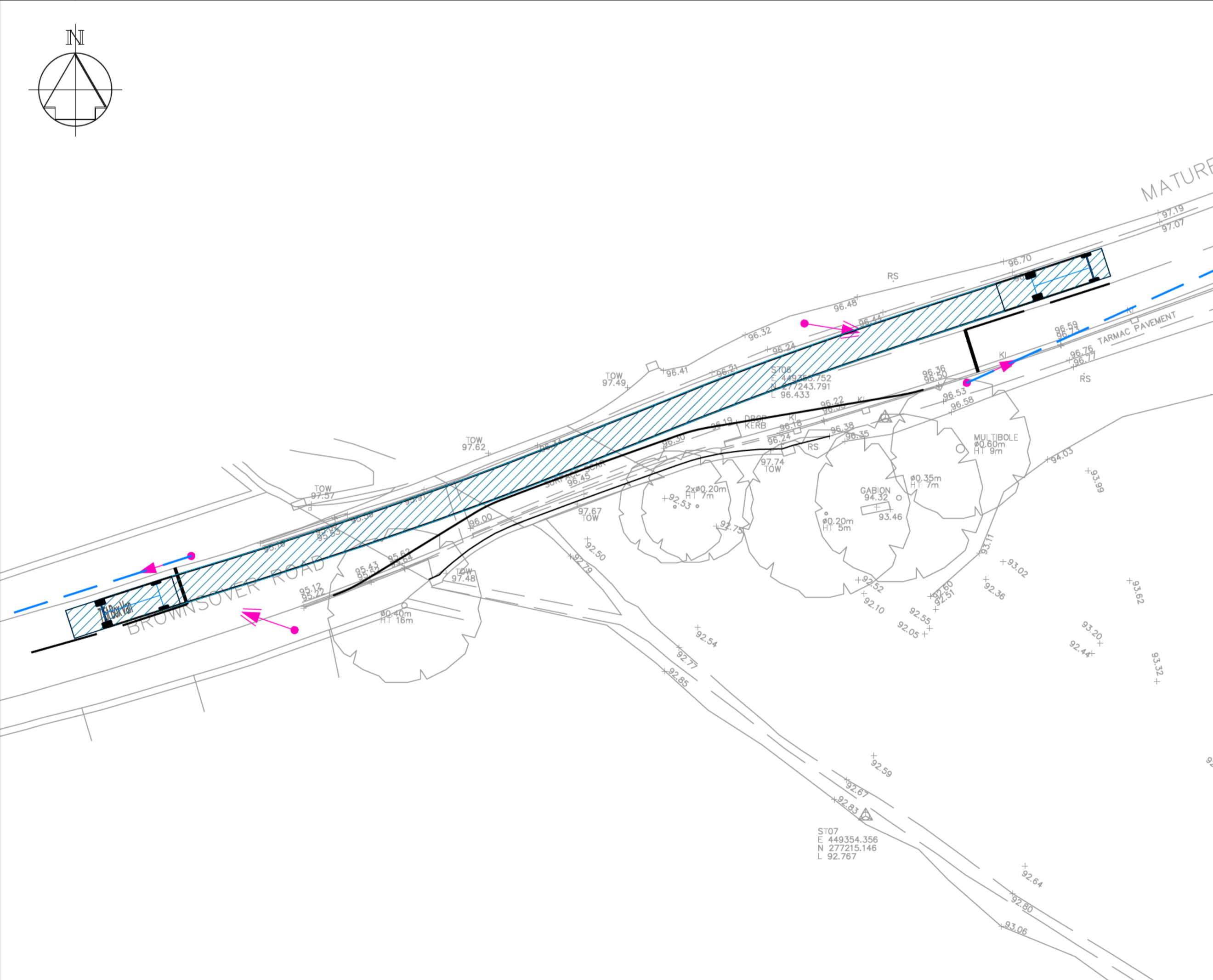
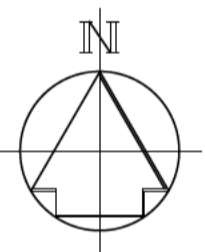


Existing white line buffer to the bridge parapets to remain



2m wide footway across the canal bridge, to tie into existing footways on both sides of the bridge

- GENERAL NOTES
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  - G2. ANY DIMENSIONAL DISCREPANCIES SHOULD BE NOTIFIED TO THE ENGINEER IMMEDIATELY.
  - G3. ALL DIMENSIONS ARE IN MILLIMETRES - (mm) ALL LEVELS ARE IN METRES - (m) AND ARE ABOVE ORDNANCE DATUM AT NEWLYN, CORNWALL UNLESS NOTED OTHERWISE.
  - G4. NORTH SHOWN INDICATIVE ONLY
  - G5. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT SPECIFICATIONS, DRAWINGS, DETAILS AND OTHER DESIGN INFORMATION.
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7.5t Box Van	8.010m
Overall Length	2.100m
Overall Width	3.556m
Overall Body Height	0.351m
Min Body Ground Clearance	2.064m
Track Width	4.00s
Lock to lock time	7.400m
Kerb to Kerb Turning Radius	

P01	FIRST ISSUE	SP	CH	CH	15.12.25
REV	DESCRIPTION	DRN	CHK	APP	DATE

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Architect/Client/Contractor  
**MILLER HOMES**

Project  
**BROWNSOVER ROAD, RUGBY**

Drawing Title  
**SIGNALISED CROSSING OVER CANAL BRIDGE**

Drawing Status			
<b>FOR INFORMATION</b>			
	Name	Date	Status Code
Drawn	S. PAOLI	15.12.25	S2
Designed	S. PAOLI	15.12.25	Scale
Eng Chk	C. HOLLOWAY	15.12.25	Revision
Approved	C. HOLLOWAY	15.12.25	P01

Drawing No.  
**110952 - PEF - ZZ - XX - DR - C - 0100**

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