

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official use
only)

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

Rugby Borough Council Proposed
Submission Local Plan

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Max"/>
Last Name	<input type="text"/>	<input type="text" value="Morgan"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Graduate Planner"/>
Organisation (where relevant)	<input type="text" value="Richborough"/>	<input type="text" value="Marrons"/>
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" value="REDACTED"/>
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:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="EN4"/>	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" value="X"/>
(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.

1. Policy EN4 is not justified or consistent with national policy for a number of reasons.
2. Firstly, the Framework at Paragraph 16 criterion c) advises that Plan-making should “be shaped by early, proportionate and effective engagement between plan-makers and communities, businesses”. There has been no engagement or consultation on Policy EN4 prior to the publication of the Regulation 19 Plan. Landowners and land promoters within those areas were not consulted formally or informally prior to its inclusion in this Publication Draft. This is a breach of the Council’s Statement of Community Involvement and contrary to the Framework.
3. Secondly, previous Areas of Separation from the 1990s were dropped from the previous Local Plan adopted in 2011, and not included in the current adopted Plan in 2019. The previous policy support for their inclusion in the 1990s was the then

Warwickshire Structure Plan. That support no longer exists, and there is no support in national policy either for the inclusion of Areas of Separation. References in the Area of Separation Study Report to policies of the Framework relate to conservation of the natural, built and historic environment but not to areas of separation.

4. Thirdly, the policy is not justified as it is not supported by proportionate evidence, which is clear, and fails to provide a robust justification for the policy. The evidence is weak.
5. The policy is a criteria-based policy, setting out the criteria by which development will be assessed and considered acceptable.
6. The purpose of the policy is avoiding coalescence and retaining the separate identity of settlements; rather than protecting high quality landscapes in the urban fringe and provide access to the countryside. However, within the Areas of Separation Report (2025) there is no reference or a list of criterion by which to assess the “identify and distinctiveness of settlements”. Only an assertion that the evaluation of settlement “primarily relies upon information drawn from conservation appraisals and parish or neighbourhood” (paragraph 5.6). As a result, it is considered that the approach adopted lacks clarity and transparency and does not provide a criterion for an independent assessment. This is a fundamental flaw within the evidence to justify the policy’s inclusion within the Plan.
7. Whilst the evidence does go on to list a criterion by which land within an assessment area is deemed to make a stronger contribution to settlement identity. The following is the only criteria which they list:
 - It is an important part of a settlement’s setting;
 - It features prominently in the views to and from the settlement;
 - It provides a clear sense of arrival to or departure from the settlement; or,
 - It contributes positively to a conservation area’.

8. However, this approach lacks transparency and a scoring mechanism for examination, and is a deficiency, i.e. how did the Council, or an independent assessor, define less than a 'stronger contribution'.
9. Unfortunately, this situation is further replicated through the LPA's methodology for examining the Physical and Visual Separation and Urbanising Influences. Again, the evidence attempts to only define 'stronger contribution'.
10. Paragraph 5.7 of the Areas of Separation Report 2025, advises that land within an assessment area is deemed to make a stronger contribution to settlement identify and lists four criteria, however, there is no methodology to determine how "Strong contribution" is defined or indeed any information to say what less than a strong contribution means.
11. The same lack of definition relates to how "*important part*" of settlements have been defined, along with "*it features prominently in the views to and from the settlement*" and how prominent and positive contributions have been arrived at, without this information it is not possible to understand how this has been judged.
12. Concern is also raised over the criteria assessing the nature of arriving and departing to and from the settlement, it is not known where this is being assessed from, for example what types of routes would the receptor be passing along.
13. In addition, there is also a lack of definition in terms of the approaches taken for the physical and visual separation and the urban influences, with only a definition given for *stronger contribution*.
14. The methodology used to inform the policy is insufficient as it is inadequate and lacks clarity. The methodology does not demonstrate how the relative importance of the land parcels has been defined.
15. It is unclear as to what specialist technical input has been utilised in the preparation of the report, for example, heritage, conservation officer, landscape architect. The methodology section refers to a desk top based exercise being undertaken supplemented by planning officers have walked through and around the assessment area.

16. In summary, the policy is not sound as it is not justified for the following reasons:

- The Methodology/Approach is deficient, lacking in the definition of terms, and their detail of terms.
- The methodology is insufficiently explained and lack clarity for an independent assessment.
- The use of the Methodology/Approach seems to have been used to only support higher contribution land (in order to support their justification for the Area of Separation).
- The Methodology lacks detail and appears to be poorly explained and is insufficiently robust.
- There is a lack of defining the scope and purpose of the study.
- Who undertook the assessment and field-based assessment, their qualifications and experience i.e., Planner, Masterplanner, Landscape Architects?
- Time of year when the field-based assessment was undertaken?

17. As a result, the policy and the evidence base used to support the policy is not justified as it fails to take into account reasonable alternatives that could have been used as opposed to proposing an Area of Separation Policy.

Site Specific comments on Land East of Rugby Road, Clifton-upon-Dunsmore (Site ID 238/335).

18. Given that the Council has not published its appraisal of smaller land parcels between Clifton upon Dunsmore and the urban edge of Rugby to the southeast and south, or that to the west northwest, Richborough must consider that the stated level of contribution is that of the overall, broad area:

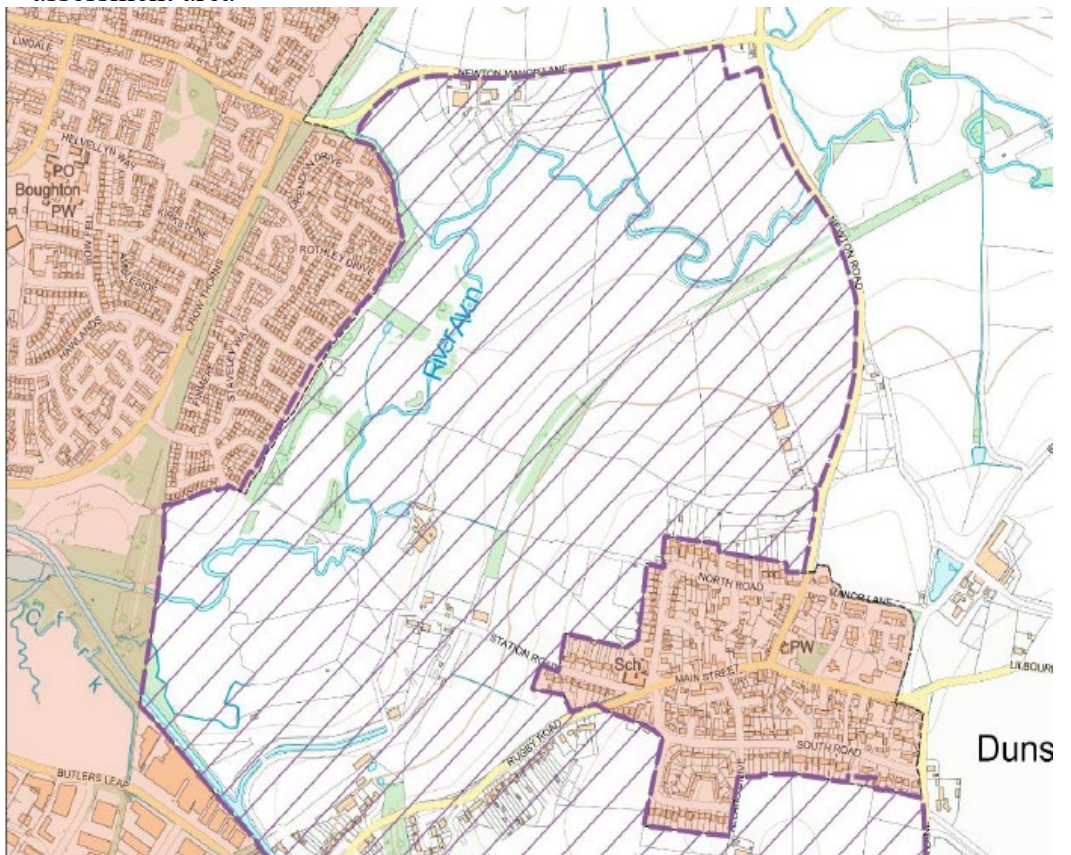
'The area between Rugby and Clifton upon Dunsmore contributes strongly to the separation of the two settlements, barring the ribbon development which connects the two along Rugby Road. Therefore, there is a clear opportunity to designate an area of separation in this location'

19. In their description, the Council recognise a number of existing urban, developed land or infrastructure features which it has utilised to define the boundaries to the broad area by which they are proposing the Area of Separation within. Some of these features are noted by the Council at paragraph 6.1 of the Area of Separation Study:

'The assessment area is bounded by the railway line to the south, by Hillmorton Lane and Newton Road to the east, by Newton Manor Lane to the north, and by the Butlers Leap employment area and residential properties off Staveley Way to the west'.

20. However, from our field-based assessment, Richborough finds that the southern part of the proposed Area of Separation is defined differently to that of the western part. Specifically, land to the west of the village is predominantly rural, agricultural fields delineated with hedgerows and hedge line trees. There are small, wooded groups along the River Avon; see Image 1:

Extract from the Rugby Borough Council's Area of Separation Study (published November 2025), PDF page 20, Figure 5: Rugby – Clifton upon Dunsmore assessment area



21. Whereas land to the south of the village is similarly managed as agricultural fields neighbouring the village, landform falls away down to a number of robust man-made features include Houlton Way roadway, the Oxfordshire Canal (as well as roadway bridge on Houlton Way over the canal) as well as the Rugby Golf Club. The periphery of the proposed Areas of Separation south of the village is defined by the main railway line running along the eastern edge of Rugby town, beyond which there is extensive residential development and employment-built form and land uses off Butlers Leap. Clifton Brook runs through the Golf Club and also Bluebell Woods to the southwestern edge of the area too.
22. Given this, the western edge of the proposed Area of Separation is more plainly defined by a woodland block, existing residential development and Newton Manor Lane, a local vehicle route with only open countryside situated between Rugby and the village. However, the southern area contains several significant man-made physical features within, which in themselves individually are as durable as those defining the quantum of the proposed western area.
23. From the Area of Separation Study (November 2025), the Council consider the proposed Rugby–Clifton upon Dunsmore Area of Separation makes a ‘stronger contribution’ for i). Settlement Identity; ii). Physical and Visual Separation; and iii). Urbanising Influences; which is summarised in the following:

Settlement Identity

24. Under the heading of Settlement Identity, the Council states the following (N.B. Underlining added for emphasis):

‘Clifton upon Dunsmore is a historic village in a countryside setting. It has a conservation area, whose character has been well maintained, primarily stretching east to west along Main Street. It includes five Grade II listed buildings, one Grade II* listed building (Church of St Mary), and numerous other non-designated buildings of historic importance. Outside of the conservation area there are several more modern sections of the village, including the residential areas along North Road (to the north) and South Road (to the south)

which were mostly built-out in the mid-20th century, and the area comprising Hadfield Close and Son Close to the northeast which was constructed on part of the grounds of Clifton Manor in the 1980s. As a result of this modern development, there only remains limited inter-visibility between the Conservation Area and the open countryside that lays within the assessment area, namely views from South Road looking South beyond the recreation ground, and glimpses of countryside looking down Rugby Road and Station Road.

Between the town and the village along Rugby Road there is ribbon development, much of which was initially constructed in the inter-war period. The only breaks in this ribbon between the two settlements are the bridge crossing the Oxford Canal, and the bridge that crosses a disused railway cutting between Vicarage Hill and Rugby Road.

25. Given the foregoing, Richborough note the following relative to the Council Methodology criteria for 'Settlement Identity':

'It is an important part of a settlement's setting'

26. The village is set with open, agricultural land stretching around the settlement from the southeast to northwest within the proposed Area of Separation. Richborough judges that the open agricultural land predominates across the proposed Area of Separation running southeast to northwest.

'It features prominently in the views to and from the settlement'

27. Views of the open countryside setting is limited from within the Conservation Area, which is largely situated within the linear part of the village. Views across the Recreation Ground between the village and open countryside to the south are noted. Richborough judges there are limited opportunities to see outwards from the Conservation Area, which itself is predominantly enclosed by an outer edge of modern day/20th century-built form.

'It provides a clear sense of arrival to or departure from the settlement'

28. There is ribbon development of built form along Rugby Road almost physically linking the village with Rugby in the southwestern periphery of the proposed Area of Separation, whereby the bridge crossing the Oxford Canal providing fleeting relief between the two settlements. At this location there is a very limited experience of passing from one settlement to the other i.e. Rugby to Clifton upon Dunsmore. Richborough notes that the Council highlight no specific routes or approach points that are important in this regard within their examination.

'It contributes positively to a conservation area'

29. Limited opportunity to see the open countryside setting from within the Conservation Area due to the extent of modern-day development which has transpired in the later 20th century. Richborough judges there are limited opportunities to see outwards from the Conservation Area, which itself is predominantly enclosed by an outer edge of modern day/20th century-built form.

Physical and Visual Separation

30. From the observations of the whole area, the Council states the following (N.B. Underlining added by Richborough for emphasis):

'The gap between Rugby and Clifton upon Dunsmore varies in length. There is around 1km between the south of the village and the north of the town (the railway); around 700m between the west of the village and the east of the town (residential properties off Staveley Way); and around 600m between the southwest of the village and the Butlers Leap employment area of the town.

Rugby Road acts as the key connecting link between the two settlements, followed by Hillmorton Lane, and the combination of Newton Road and Newton Manor Lane. A pedestrian link is also provided by a public right of way (R114) that crosses from Station Road to the public open space on the eastern edge of Brownsover, however, as this is not paved, its accessibility is limited.

To the south of the village, the physical features that separate the two settlements include the railway, the Oxford Canal, the Houlton Way Road and mature trees along site boundaries. To the west and northwest of the village, the

separating physical features include the River Avon, mature trees along site boundaries, and a disused railway line which lays on raised ground in some areas and is accompanied by mature trees along most of its length.

The topography of the assessment area is as follows. Most of the village and the fields directly to its south (including the recreation ground) are on a relatively high plateau (c. 115m) which then slopes away into a valley that reaches its lowest point along the Clifton Brook and the River Avon. The land then rises back up towards the town, although areas of development on the edge of the town, such as the properties of Staveley Way and to the north of Lower Hillmorton Road, are still lower than the village'.

31. Given the foregoing, Richborough notes the following relative to the Council Methodology criteria for 'Physical and Visual Separation':

It contributes to a broad gap between settlements

32. The gap of the proposed Area of Separation is defined predominantly by open agricultural land. With the western part of the area delineated by existing residential development, and the southern part with numerous man-made durable features along its edges, and within the southern part of the gap.
33. Richborough notes that broadness of this area is varied, and experienced as a border space to the south of the village whereby there are a number of robust physical features creating a layering effect along its southern edge.

It has a clear physical feature that marks the settlement edge

34. The settlement edge of Clifton upon Dunsmore is predominantly marked by the end of existing residential development. The village is not defined by a watercourse (river or brook), canal, railway line or main roadways passing to and from the wider urban conurbation.
35. These features, combined with employment buildings and land uses, as well as a golf course are found extensively to the southern periphery of the proposed Area of Separation and are away from the village edge of Clifton upon Dunsmore.

It does not contain direct vehicular links between settlements

36. The proposed Area of Separation is delineated by vehicular routes. Rugby Road runs through the Area, with Hillmorton Lane delineating the southeastern edge, and Newton Road and Newton Manor Lane to the west-northwest. The southern part of the proposed Area contains Houlton Way, which runs parallel to the Oxford Canal. Both of these routes are set within the proposed Area of Separation.

Urbanising Influences

37. From the observations of the whole area, the Council states the following (N.B. Underlining added by Richborough for emphasis):

'The ribbon development along Rugby Road has a clear urbanising influence. This is strongest closer to Rugby where there is development on both sides of the road, including terraced houses that are not dissimilar to those found in parts of the town, and weaker to the north where there is farmland to the west and expansive views of the countryside that separates Clifton upon Dunsmore from Rugby.

Aside from the Houlton Way Road, the assessment area to the south of the village is composed exclusively of farmland, the golf course, and watercourses, and is therefore considered to be reasonably free of urbanising influences.

The area to the west and northwest of the village is primarily composed of open farmland and natural and semi-natural space. There are some pockets of development, including Clifton Wharf, farm buildings, and isolated dwellings, however these are all considered to accord with a rural setting, and are therefore not considered to have an urbanising influence'.

38. Given the foregoing, Richborough notes the following relative to the LPA Methodology criteria for 'Urbanising Influences':

'It lacks any development, or the development which exists is rural in character'

39. Predominantly within the proposed Area, land use is open, agricultural land. The exception to this is to the south whereby Rugby Golf Club is within the proposed Area, as well as the Oxford Canal and Houlton Way which pass through, beyond which is the golf course.

'It lacks infrastructure associated with human activity'

40. The western part of the proposed Area is predominantly rural and agricultural within the gap to Rugby (between the village and the urban area of Brownsover). The exception is the southern part of the proposed Area where there are a number of man-made , infrastructure and land uses including Rugby Golf Club is within the proposed Area, as well as the Oxford Canal and Houlton Way which pass through, beyond which is the golf course. The main railway line and neighbouring employment-built form defines the southern boundary. The southern part of the proposed Area is more extensively influenced by infrastructure and man-made features.

'It has natural or semi-natural land uses, such as woodland or wetlands'

41. The Oxford Canal and Houlton Way roadway pass through the southern part of the proposed Area, with Rugby Golf Club situated both of these man-made land uses. The main railway line and neighbouring employment-built form defines the southern boundary. The southern part of the proposed Area is more extensively influenced by infrastructure and man-made features.

The current function of Site 335/248

42. The evidence base makes it clear that Rugby to the west of Clifton upon Dunsmore is not physically and perceptually connected with the village. However, to the southwest, the 'ribbon development along Rugby Road has a clear urbanising influence. This is strongest closer to Rugby where there is development on both sides of the road, including terraced houses that are not dissimilar to those found in parts of the town' creating coalescence at a point where the experience of passing between Rugby and Clifton upon Dunsmore is not obvious and overt.

43. The Area of Separation Study (November 2025) highlights the gap between Rugby and Clifton upon Dunsmore, the Council notes a number of Key Characteristics of the Settlement Gap, which are as follows:

- *'The undeveloped river valley which lays between the west of the village and the east of the town, extensive views of which can be seen from Rugby Road and which acts to provide a sense of travelling through the countryside on the approach to Clifton upon Dunsmore.*
- *The undeveloped farmland which lays between the south of the village and the north of the town as seen from Hillmorton Lane and Houlton Way, which helps to retain the rural character of the settlement gap.*
- *Mature tree cover on the edge of the town which limits views of Clifton upon Dunsmore from the residential area around Staveley Way.*
- *The disused railway line and mature trees that accompany it to the west of the village, which act as a feature of physical separation'.*

44. However, the evidence base does not recognise the significance and frequency of the man-made features to the southern part of the proposed Area of Separation. The combination of the existing golf course, Oxford Canal, Houlton Way roadway, as well as the neighbouring employment-built form and land uses and the enclosure of the Area by the main railway are all durable features that perceptually segregate the Area into small pieces. Additionally, to this, to the south of the village, landform falls away create a natural physical feature that further defines the wider southern Area from that around the village.

45. Given the foregoing, Richborough judges that Site 335/248 is situated within a land parcel which neighbours the village but is segregated away from the wider gap between the village and the urban conurbation of the town to the southeast and southwest. This is not the case for the land within the gap to the west and northwest which is open countryside defined by the settlement edge in each direction between the village and the town.

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.

46. Policy EN4 should be deleted from the Plan.

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:

47. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

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.

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

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**Name of the Local Plan to which
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Part A

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2. Agent's Details (if applicable)

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First Name	<input type="text"/>	<input type="text" value="Max"/>
Last Name	<input type="text"/>	<input type="text" value="Morgan"/>
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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S1"/>	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" value="X"/>
(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.

1. Policy S1 and the identification of Clifton upon Dunsmore as a main rural settlement capable of accommodating development is sound. This policy is justified and evidenced within the Rural Sustainability Study. In addition to facilities within the village, the settlement is well related to Rugby and Houlton and therefore the need to travel for residents is reduced and there is a genuine choice of modes of transport modes to many of its services. Locating new development at Clifton should focus on locations which can improve its connectivity between the village and Rugby and Houlton.

2. However, the second sentence of A. ii. is not sound as it is not positively prepared or justified. The requirement that development will be ‘small scale’ places an arbitrary limitation without any evidence. These are large rural settlements capable of accommodating major development, and further growth should not be constrained arbitrarily if it is required to meet the needs of the Borough.

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.

3. The second sentence of A. ii. should be amended to remove 'and would likely be small scale'.

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.

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S2"/>	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 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.

1. Not sound
2. The housing requirement and supply within Policy S2 is not positively prepared, justified, effective, or consistent with national policy having regard to the following evidence.
3. In respect of Policy S2 Part A. Housing Requirement, the Plan fails to identify an appropriate housing requirement for the following reasons:

Plan Period

4. The Plan period to 2042 will not look ahead over a minimum of 15 years from adoption. The LDS assumes adoption by June 2027. 15 years from June 2027 is June 2042. Rugby undertakes its housing monitoring in April of each year, and its housing trajectory therefore only projects and plans for housing delivery until March 2042. There will not therefore be a 15 year plan period.

Unmet Housing Needs

5. The Council needs to ensure they have considered accommodating unmet housing needs arising from outside of the Borough to ensure compliance with the Duty to Cooperate and to ensure that the New Local Plan can meet the positively prepared soundness test set out in Paragraph 36 of the Framework.
6. The adopted Rugby Local Plan provides 2,800 dwellings to meet the unmet needs of Coventry until 2031. Whilst the emerging Coventry Local Plan Review is not envisaging declaring unmet needs for housing, this will need to be monitored prior to submission of the Plan and through the Examination.

Local Housing Need

7. National planning practice guidance is clear that the Local Housing Need derived from the Standard Method may only be relied upon for a period of two years from the time the Local Plan is submitted for Examination. It would therefore be prudent for the Council to review the housing requirement calculated utilising the Local Housing Need derived from the Standard Method prior to Submission.

Affordable Housing Need

8. This section summarises the key indicators of affordable housing need and delivery in Rugby Borough. As part of this, Richborough have considered Rugby Borough Council's (RBC) most recent evidence base documents in respect of housing need.

The National Housing Crisis

9. Affordable housing need has become acute across the country as the affordability of housing has worsened over the past two decades, and the loss of affordable stock has accelerated.
10. The January 2022 House of Lords report 'Meeting Housing Demand' identified "*there were 1,187,641 households on local authority housing waiting lists in 2021*" and "*as of March 2021, 95,450 families had been placed into temporary accommodation by local authorities.*"¹

¹ Paragraph 69, page 36, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

11. Research for the National Housing Federation (NHF) and Crisis in 2018 identified a need for 145,000 new affordable homes per year, of which 90,000 for the next 15 years should be for social rent, 30,000 for affordable rent and 25,000 shared ownership homes.²
12. However, to put this into context, only 64,762 new affordable homes were delivered across England in the most recent year for which data is available (2024/25), approximately 28.2% of all net completions (208,600).
13. Nevertheless, this a gross affordable delivery figure and the Government's statistics show a loss of 23,060 affordable dwellings in 2024/25 to demolitions and sales.
14. Net affordable completions were therefore only 41,160 (i.e., 19.7% of all housing completions).
15. Furthermore, the House of Lords report stated, "*There has been a steady decline in social rent as a proportion of new supply, from over 75% in 1991/92 to 11% in 2019/20. In 50 local authorities, no homes for social rent were built over the five-year period from 2015/16 to 2019/20*"³ (our emphasis). There is a severe lack of local authority housing as this statement summarises.
16. The Ministry of Housing, Communities & Local Government (MHCLG) publishes data on social housing lettings in England. In its latest publication, updated on 13 November 2025, the department reported that there were 1.34 million households on local authority waiting lists as of 31 March 2025.
17. This represented a 1% increase compared to 31 March 2024. It also was the highest number of households on the waiting list since 2014 when the criteria for accessing the waiting list were tightened under the Localism Act (2011).
18. Furthermore 28% of new social lettings in 2024/25 were to statutorily homeless households, up from 27% in 2023/24.

² Professor Glen Bramley, Crisis and National Housing Federation Housing supply requirements across Great Britain (November 2018)

³ Paragraph 65, page 33, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

19. The NHF also undertook research in late 2023 which concluded that unless politicians commit to a long-term plan to fix the housing crisis, an extra 1.7 million households will be living in unaffordable homes by 2030 compared with 2020 - an increase of more than a third (35%).
20. The NHF research also found that by 2030 there will be:
 - 600,000 additional households living in unaffordable private rented homes, taking the total to 2.2 million.
 - 1 million additional homeowners facing unaffordable mortgage costs, taking the total to 1.9 million - more than double current levels.
 - 1.5 million Families will be on the waiting list for social housing, a rise of 350,000 or almost a third (32%).
 - 150,000 children will be homeless and living in emergency accommodation like B&Bs and hostels by 2030 – an increase of 20,000. This is the equivalent of six children in every school in England.⁴
21. In April 2023 the NHF also found that more than 310,000 children were sharing a bed with their parents or siblings; and the number of homeless children stuck in temporary accommodation reached 130,000 in 2023, the highest number since records began⁵.
22. Marrons ‘Housing 2040’ report (April 2024) found that approximately 500,000 more affordable homes would be lost by 2040 to demolitions and sales if recent trends continued.⁶
23. In the context of the above it is imperative that affordable housing is provided across the country.
24. The remainder of this section considers the housing position in RBC, drawing on key indicators which are publicly available. These indicators include the following:
 - Affordable housing need.
 - Gross affordable housing delivery.
 - Affordable stock losses.

⁴ The housing crisis: what will happen if we don't act? NHF, August 2023

⁵ Overcrowding in England, NHF, April 2023

⁶ Housing 2040, Marrons, April 2024

- Net affordable housing delivery.
- Households on the Council housing waiting list.
- Homelessness.
- Temporary accommodation.
- The affordability of housing.

25. We then consider what unconstrained overall housing need would be if affordable housing need was to be delivered in full. This is set in the context of paragraph 69 of the 2024 NPPF which states *“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.”*

Affordable Housing Need and Delivery in Rugby Borough

26. The most recent evidence base document to determine net affordable need is the ‘Updated Housing Needs Evidence for Rugby Borough’ document published in September 2025. This calculates a need of 474 affordable dwellings per annum (338 per annum unable to buy or rent, and 136 per annum able to rent but not buy).⁷

27. Prior to this Table 8.45 (page 196) of the 2022 Housing and Economic Development Needs Assessment (HEDNA) concluded that affordable need split between rented and affordable home ownership was 495 affordable dwellings per annum from 2022 onwards.

28. Policy H2 (Affordable Housing) of the January 2026 Draft Plan states how 20% affordable housing delivery will be expected on sites of 10 or more dwellings within the Rugby urban area and 30% elsewhere in the Borough. It will be 40% on sites released from the Green Belt through the plan or other Green Belt permissions.⁸

29. This would mean unconstrained overall housing need of 1,185 dpa if affordable housing need were to be met in full, based on 40% delivery being achieved on all sites. Based on 30% delivery this increases to 1,580 dpa.

⁷ Page 2, Updated Housing Needs Evidence for Rugby Borough, September 2025

⁸ Page 49, Rugby Borough Proposed submission Local Plan 2025-2042, January 2026

30. This illustrates how an increase to the Draft Plan’s housing requirement (636 dpa) is needed to deliver more affordable housing in Rugby.
31. Prior to the 2022 HEDNA, the September 2015 Updated Assessment of Housing Need: Coventry-Warwickshire HMA concluded affordable need was 171 dpa based on a 35% rent to income threshold for affordability. This figure increases to 250 dpa based on 30% affordability and 345 dpa for a 25% affordability threshold and our view is that the threshold should be no more than 30%.
32. However, the adopted Rugby Borough Council Local Plan (June 2019) adopted the figure of 171 dpa for the 2011-2031 period.
33. In the context of the above Richborough have therefore assessed affordable housing delivery against the need of 171 dpa (2011/12 to 2021/22), the 2022 HEDNA’s calculation (495 dpa) for the next two years, and 474 dpa in the most recent year.
34. In this context Table 2.1 sets out the affordable delivery published in RBC’s Annual Monitoring Reports (AMRs).

Table 2.1: Affordable Housing Completions in Rugby, 2011/12 to 2024/25

2011 -12	2012 -13	2013 -14	2014 -15	2015 -16	2016 -17	2017 -18	2018 -19	2019 -20	2020 -21	2021 -22	2022 -23	2023 -24	2024 -25
80	92	97	129	46	3	48	163	291	233	125	212	205	120

Borough Authority Monitoring Reports

35. As Table 2.1 illustrates, according to RBC’s AMRs there has been gross delivery of 1,844 affordable dwellings since the start of the adopted Local Plan period.
36. However, reference to the Government’s social housing sales and demolitions dataset shows a loss of 916 properties from the social housing stock since 2011/12 as summarised in Table 2.2 below.
37. It should be noted how 75% of the lost stock (708 dwellings) have been demolitions or right to buy sales of local authority owned stock.
38. The above means that net affordable housing completions have only been 808 over the 2011/12 to 2023/24 period (62 affordable dwellings per annum) against a need of 2,700 affordable dwellings based on the Council’s evidence base. This means the Council

have failed to deliver their affordable need in 11 of the past 13 years and only 30% of need has been delivered.

Table 2.2: DLUHC figures on the disposal of social housing stock: Rugby Borough

<i>Year</i>	Demolition	LCHO sales	Other sales	Other sales to sitting tenants	Right to Buy	Grand Total
2011-12	-	2	-	-	7	9
2012-13	-	1	1	-	17	19
2013-14	38	5	-	-	22	65
2014-15	1	10	4	3	34	52
2015-16	6	26	13	3	35	83
2016-17	-	7	-	-	26	33
2017-18	-	13	10	3	25	51
2018-19	-	13	2	1	20	36
2019-20	-	13	11	29	24	77
2020-21	-	12	1	2	19	34
2021-22	132	17	-	2	28	179
2022-23	-	13	2	1	25	41
2023-24	221	6	-	1	9	237
2024-25	-	11	2	-	19	32
Grand Total	398	149	46	45	310	948

Source: Social housing sales and demolitions open data, www.gov.uk

Net Affordable Housing Delivery as a Proportion of Overall Housing Delivery

39. Having established the net affordable delivery in RBC since 2011/12, Table 2.3 compares net affordable delivery against net delivery of all housing types.

Table 2.3: Net affordable housing provision as a % of overall housing provision in RBC, 2011/12 to 2023/24

	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	Total
1	71	73	32	77	-37	-30	-3	127	214	199	-54	171	-32	88	896
2	338	456	448	425	534	376	596	939	859	832	939	1,349	873	676	9,640
3	21%	16%	7%	18%	-7%	-8%	-1%	14%	25%	24%	-6%	13%	-4%	13%	9%

Sources: RBC Annual Monitoring Reports and www.gov.uk

1. Net affordable completions.
2. All net completions.
3. Net affordable completions as a % of net overall completions.

40. Table 2.3 illustrates how net affordable delivery has only been 9% of all housing delivery between 2011/12 and 2024/25.

41. If this level of delivery were to continue and RBC were to deliver their most recent calculation of affordable need (474 dpa) in full, overall housing need would be 5,000 dwellings per annum.
42. This level of overall housing delivery is unrealistic but illustrates how poor the Council’s delivery of affordable housing has been since the start of the adopted Local Plan period, and how the housing requirement of the Local Plan should increase as much as possible in order to deliver the affordable housing needed.

Households on the Housing Register

43. The number of homes on the Housing Register can also provide an indication of the need for affordable housing. Table 2.4 provides register data from 2014 when changes to the criteria for accessing housing waiting lists were introduced by the Government in October 2013.

Table 2.4: Rugby Borough Housing Waiting List 2014-2023

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Households	734	701	721	881	1,092	1,062	394	448	646	646	272	465

Source: DLUHC live table 600: local authority waiting lists

44. These changes in 2013 allowed councils to consider whether prospective council tenants had a ‘local connection’ to the area – usually by living in the area, but occasionally working, a condition previously applied to a council’s homelessness duty.
45. The changes made in respect of the waiting list criteria in 2013 led to the waiting list in Rugby dropping from 1,628 households in 2013 to only 734 in 2014, potentially excluding a significant number of households in need. A similar pattern was experienced across the country following the changes.
46. Notwithstanding this change, Table 2.4 shows how the number of households on the waiting list had reduced between 2014 and 2020 but since 2020 has risen again to the most recent position of 465 households.

47. It is important to note that these figures are households, which could contain several people. The number of people on the waiting list is therefore significantly higher. This is considered to emphasise the need for affordable housing in Rugby Borough.

Homelessness

48. In respect of homelessness, Table 2.5 sets out the data collected by MHCLG for the last seven financial years. Data was not collected for Rugby in the 2021/22 and 2022/23 for unknown reasons.

Table 2.5: Homelessness in Rugby, 2018/19 to 2024/25

1. Year	2. Number of households assessed	3. Total households owed a duty	4. Threatened with homelessness - Prevention duty owed	5. Homeless - Relief duty owed
6. 2024/25	7. 415	8. 396	9. 130	10. 266
11. 2023/24	12. 348	13. 336	14. 76	15. 260
16. 2022/23	17. n/a	18. n/a	19. n/a	20. n/a
21. 2021/22	22. n/a	23. n/a	24. n/a	25. n/a
26. 2020/21	27. 324	28. 311	29. 76	30. 235
31. 2019/20	32. 569	33. 548	34. 190	35. 358
36. 2018/19	37. 423	38. 411	39. 153	40. 258

Source: DLUHC

49. Table 2.5 shows how the number of households assessed as being homeless and owed a relief duty has largely remained the same since 2018/19, although it has increased in the last 12 months.

Affordability of housing

50. The lower quartile and median affordability ratios published by the Office for National Statistics (ONS) provide an indication of how the affordability of housing has changed over the recent past.

51. The median workplace-based affordability ratio is used to determine minimum overall housing need using the 2024 NPPF's standard method. Workplace-based affordability ratios are a measure used to assess housing affordability by comparing house prices in the local authority area to the average incomes of people who work in that area (as

opposed to those who live there). This ratio is useful for understanding whether people working in a location can afford to live there.

52. The lower quartile workplace-based affordability ratio measures the multiple of lower quartile earnings required to afford a lower quartile home (i.e., most reasonable 25% of homes). This ratio focuses on how affordable housing is for low-paid workers trying to buy the cheapest homes in the area. It's a crucial metric for housing policy, especially around essential workers (e.g., teachers, nurses, service workers).

53. Table 2.6 sets out these figures for the past decade for Rugby Borough.

Table 2.6: Median and lower quartile affordability ratio change in Rugby, 2011/12 to 2022/23

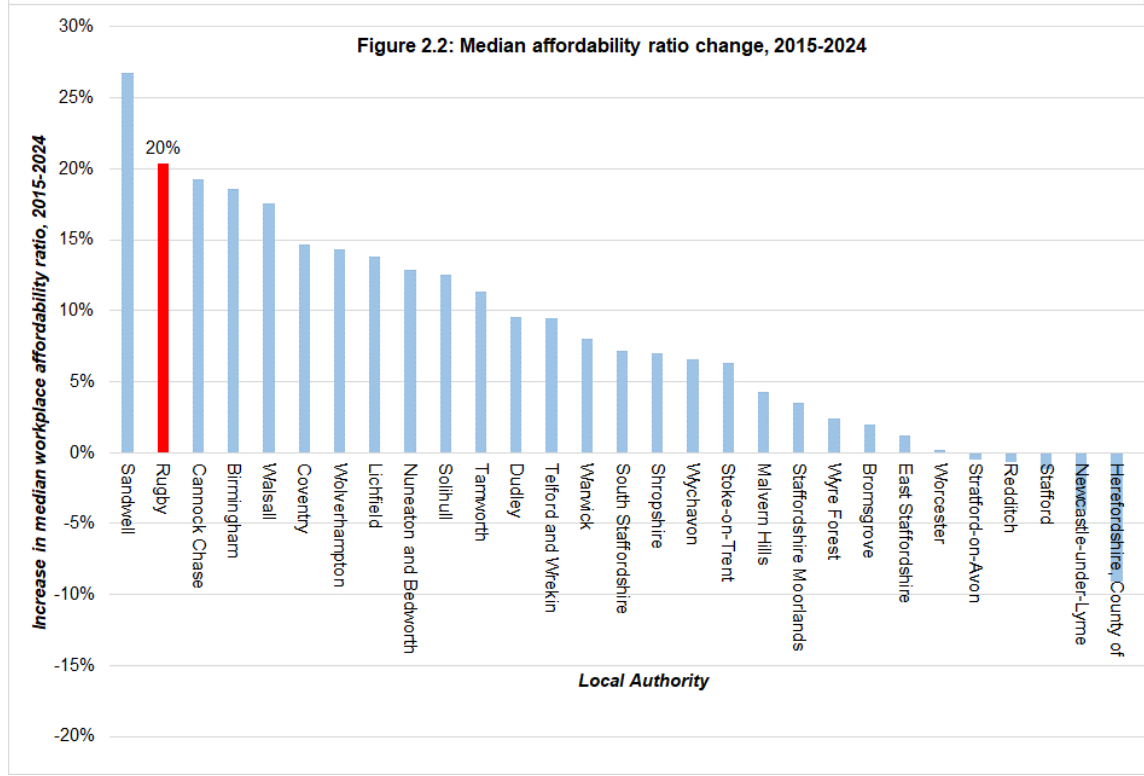
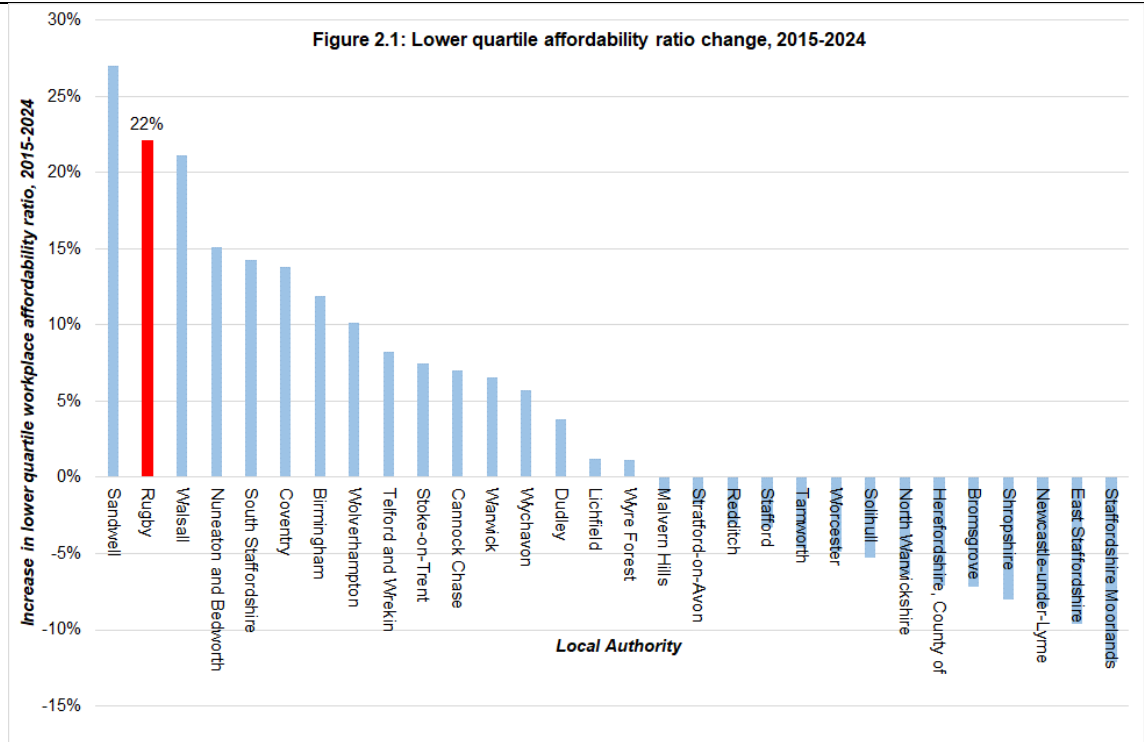
Ratio	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	% change 2014-15 to 23/24
Lower Quartile	6.15	6.77	7.42	7.56	7.85	7.18	7.99	7.50	7.88	7.51	+22%
Median	6.15	6.50	6.74	7.73	7.72	7.34	7.64	7.66	8.71	7.40	+20%

Source: ONS

54. Table 2.6 shows a 22% increase in Rugby's lower quartile affordability ratio over the past decade. Only one other authority (Sandwell) of 30 in the West Midlands region have experienced a higher increase in their lower quartile affordability ratio. Several have seen their ratios fall over this period indicating an improvement in affordability. Figure 2.1 illustrates this data.

55. The median ratio change over the past decade has been similarly high at 20%. This is again the 2nd highest increase in the region behind Sandwell again and is illustrated in Figure 2.2 against all other West Midlands authorities.

56. As of 2023/24 Rugby has a median ratio of 7.40 and a lower quartile ratio of 7.51 meaning home ownership is out of reach for the vast majority of people who work in the Borough.



Summary

57. In summary the key points from this section are as follows:

- Affordable need was determined by the Council's evidence base as 171 dpa 2011-2031, however this was superseded by 495 dpa from 2022-2024, and the most recent assessment shows 474 dpa 2025-2042.
- Gross affordable delivery was 1,844 dwellings 2011/12 to 2024/25 (132 dpa).
- Affordable stock losses were 948 from 2011/12 to 2024/25 (68 dpa).
- Net delivery has therefore been 896 dwellings since 2011/12 (64 dpa).
- This represents a shortfall of 2,278 dwellings from 2011/12 to 2024/25.
- Put another way less than 30% of need since 2011/12 has been delivered.
- The number of households on the waiting list is 465.
- The waiting list has risen by 71% in the past 12 months.
- The number of households assessed as homeless in 2024/25 (266) exceeds the 2018/19 figure (258).
- The 22% increase in Rugby's lower quartile affordability ratio over the past decade is the second highest in the West Midlands region.
- The 20% increase in Rugby's median affordability ratio over the past decade is also the second highest in the West Midlands region.

Demographic Growth

58. The first Office for National Statistics (ONS) local authority household projections (2022-based) in over five years were published on 28th October 2025, based on the 2022-based Sub National Population Projections (SNPP, 24th June 2025).
59. As they are linked to the 2021 Census the projections are not affected by the overestimating issues identified for the 2014-based household projections which formed the baseline need of the 2023 NPPF's standard method.
60. In the context of the NPPF and emerging NPPF stating how the housing requirement could exceed standard method need, and these projections being the most recent, there is justification to consider them in respect of Rugby.

2022-based ONS Household Projections – Rugby

61. The 2022-based household projections incorporate several variant projections, and Richborough consider these below. It should be noted that ONS recommend use of the

‘migration category variant’ projections scenario. This is because the ONS explain that it better reflects international migration patterns.

62. The additional variant projections are as follows:

- a five-year migration variant (consistent with the national population projections principal projection)
- a 10-year migration variant
- a high international migration variant
- a projected household representative rates (HRR) variant, projected throughout
- a low international migration variant
- a zero net migration variant

63. Table 3.1 lists the projections for Rugby over the proposed Plan period.

Table 3.1: 2022 Household Projections for Rugby, 2025-2042

Variant Projection	2025 Households	2042 Households	Households 2025-2042 (per annum)	Dwellings 2025-2042 (per annum)
High international migration	50,004	65,107	15,103 (888)	15,556 (915)
Five-year migration	49,982	62,406	12,424 (731)	12,797 (753)
Migration variant	49,887	61,781	11,894 (700)	12,251 (721)
Ten-year migration	49,858	61,117	11,259 (662)	11,597 (682)
Low international	49,955	59,207	9,252 (544)	9,600 (561)

migration				
HRRs projected throughout	49,537	59,056	9,519 (560)	9,805 (577)

Source: ONS

64. ONS' preferred projection is highlighted yellow and projects 700 households per annum (hpa), 2025-2042. A vacancy rate of 3% in Rugby is applied to arrive at 721 dwellings per annum (dpa), 2025-2042. This would equate to 85 additional dpa, and 1,445 additional dwellings over the proposed Plan period.
65. However, the five-year migration trend scenario would lead to an additional 1,989 dwellings over the Plan period, and the high international migration scenario, 4,743 additional dwellings.
66. The 10-year migration scenario is lower than the ONS' preferred migration variant but would still require an uplift of 782 dwellings over the Plan period.
67. Only the low international migration variant, and the variant where household representative rates (an unlikely scenario) show a lower need than the 636 dpa proposed as the housing requirement in the Draft Plan.
68. The low international migration variant assumes positive net international migration of 108,500 people per annum across the country from the year ending 2030. This should be considered in the context of net international migration to the UK which has only ever been recorded at that number or below in three quarters since 2012. All three quarters where the figure was lower included the COVID-19 Pandemic period when international travel was severely restricted.
69. Furthermore, since the end of the COVID-19 Pandemic net international migration has been a minimum of 204,000 people and a maximum of 944,000 people. The average has been 610,000 people.
70. Since 2012 the average has been approximately 370,000 people per annum on average.

71. The ONS' preferred migration variant is underpinned by only 306,600 people per annum from 2030 onwards, and the high international variant based on 476,500 people per annum from 2030 onwards.
72. In the context of the average net international migration being recorded at an average of 610,000 people per annum since the end of COVID-19 restrictions, the preferred household projection and the high international migration variant are both considered more realistic than the low international migration variant.
73. It is also imperative to consider that these are baseline projections. They make no further adjustment for affordability, as was applied in the previous standard method and the current standard method. This would increase all these figures even further.

Summary

74. In summary this section has illustrated how the most up-to-date baseline demographic projections indicate that household growth in Rugby will exceed the 636 dpa housing requirement being proposed in the Draft Plan.
75. The preferred variant of the 2022-based household projections indicates an increase of approximately 1,500 homes over the Plan period based on a conservative estimate of international net migration to the country.
76. This increases to nearly 2,000 additional dwellings under the variant historically preferred by the ONS (five-year migration) and nearly 5,000 based on the high international migration variant which is underpinned by a level of net international migration which has been regularly exceeded recently and is therefore considered realistic.

Housing Requirement Conclusion

77. On the evidence outlined above, there is a clear need to increase the housing requirement beyond the Standard Method to a minimum of 721 dpa. However, based on past delivery rates, circa 1,000 dpa is realistic and achievable in the context to align with Government objectives to boost housing supply. Housing delivery in Rugby has

averaged 965dpa since 2018/19, despite the national slowdown experienced during the COVID-19 pandemic. In 2022/23 net completions, reached 1,349 dwellings.

78. Failure to do so would exacerbate the poor affordability of Rugby and fail to acknowledge the desires of the Government as clearly set out in the Framework.

Sustainability Appraisal

79. The Sustainability Appraisal fails to adequately test higher growth options in terms of housing. It has only tested higher growth scenarios aligned to three strategic options, and should have considered an alternative scenario that provided for higher growth dispersed to the main rural settlements.

Sources of Supply

80. In respect of Policy S2 Part B. Sources of Supply, the Plan fails to demonstrate a sufficient supply of sites to meet the housing requirement or specific deliverable sites for the first 5 years of the Plan period.
81. Policy S2 B. places over reliance on larger sites. Over 60% of the housing need to be met within the new Local Plan is to come from the three strategic housing allocations adopted through the current Local Plan (South West Rugby, Houlton and Eden Park). If for any reason these sites do not come forward at pace over the Plan period (particularly South West Rugby delivering over 300 dpa for three consecutive years and an average of over 200 dpa across the Plan period), the Plan will fail in so far as meeting housing need and delivering a five year supply on adoption.
82. Notwithstanding the housing trajectory provided, there is an absence of evidence to demonstrate the housing delivery rates on South West Rugby and Houlton will be achieved within the Plan period.
83. In respect of other sources of supply, it is noted that the housing trajectory relies on 850 dwellings from windfalls (50 dwellings per annum). The inclusion of a windfall allowance for each year of the Plan period is unsound given the likelihood of double counting with sites with planning permission also taken into account in the supply.

The windfall allowance should therefore be reduced by 150 dwellings to remove the first three years of the plan period to avoid double counting.

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.

84. Policy S2 Part A. and the housing requirement should be amended to reflect an extended plan period to provide a minimum of 15 years, and to provide at least 721 dwellings per annum.

85. Policy S2 Part B. and the housing supply should be amended to increase the supply from allocations under Policy S6 to meet the amended housing requirement with a buffer of at least 10%. This should include the allocation of land east of Rugby Road, Clifton-upon-Dunsmore.

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:

86. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

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.

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

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

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

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

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

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official use
only)

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

Rugby Borough Council Proposed
Submission Local Plan

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Max"/>
Last Name	<input type="text"/>	<input type="text" value="Morgan"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Graduate Planner"/>
Organisation (where relevant)	<input type="text" value="Richborough"/>	<input type="text" value="Marrons"/>
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" value="REDACTED"/>
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:

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

Paragraph	<input type="text"/>	Policy	S6	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	X
(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.

1. Not sound.

2. Richborough object to the allocation of Site 129 (Land North of Lilbourne Road), Site 202 (Newton Road) and Site 307 (North Road) as they are not justified as an appropriate strategy having regard to reasonable alternatives which in this case is the western part of Site 238 (Land east of Rugby Road, Clifton upon Dunsmore), identified as Site 335. As identified in paragraph 5.4.49 of the SA, Site 335 can be delivered in place of the three draft allocations. Further, the allocations are not consistent with national policy as paragraph 188 of the Framework requires plans to allocate land with the least environmental or amenity value.

Site 129 – Land North of Lilbourne Road, Clifton-upon-Dunsmore

3. The Rugby Borough HELAA Stage 2 Site Options Assessment (December 2025) states Site 129 is proposed for allocation due to its better relationship with the

village and lower heritage constraints than other assessed sites within Clifton-upon-Dunsmore. That statement is not correct. The HELAA states that the site is an important element of the historic approach to the village, contributing to the rural backdrop of the conservation area and its listed buildings. The site is located adjacent to the Clifton-upon-Dunsmore Conservation Area, and is located within 75 metres of a Grade II listed building on Hillmorton Lane. This contrasts with Site 335 where there are no heritage impacts.

4. Further, in terms of promoting sustainable transport, the Site is further from existing bus stops and further from the urban area of Rugby where the majority of services and jobs are located than Site 335. The development of Site 129 for 60 dwellings will not be able to support improvements to sustainable and active travel routes within Clifton-upon-Dunsmore unlike Site 335 which can deliver an improved foot/cycle connection to Rugby on the Rugby Road.
5. In terms of development traffic flows and impacts, a significant proportion of the traffic generated by the development site would need to travel through the centre of the village as most vehicle trips would be to/from Rugby and the Houlton Way, and there are turning restrictions at the Hillmorton Lane junction to the south.
6. The development of this site would also increase traffic movements past the primary school at drop-off and pick-up time, whereas most of the traffic associated with Site 335 would not impact on the village itself.
7. Further, in terms of promoting healthy and safe communities, the Site 129 is further away from the Clifton Recreational Facilities and has no ability to provide land to extend those facilities to meet increased demand arising from an increase in population unlike Site 335 which can deliver an extension to the Recreational Facilities.
8. In landscape and visual terms, this land is on the eastern edge of the village and its development would be an adjunct to the settlement pattern/morphology of the village. This land is situated off the main eastern vehicle approach to the village and would be prominent in views for road users to and from the village. The open countryside beyond is open in nature and gently rolling through which, there is a

network of PRow passing, including the Shakespeare Way National Trail Long Distance Walking Route passing the site to the east. The Site would also be seen by road users passing to and from the village, and so is located in a gateway position especially given it has an open aspect and readily seen.

9. The land is outside a well treed edge to the village so would be experienced as outside of the village's edge in its sensory and perceptual sense, and more in the open countryside beyond. The Site would therefore extend new development outwards from the current village edge and its influence would be far ranging across the open countryside, which is situated generally lower-lying than that of the Site, and so seen on approaches to the village and from outlying settlements.
10. In landscape and visual terms, Site 129 has greater environmental and amenity value than Site 335.
68. Site 129 should therefore not be allocated as there is a reasonable alternative in Site 335 which has lesser environmental and amenity value.

Site 202 – Newton Road, Clifton-upon-Dunsmore

69. The HELAA Stage 2 Options Assessment states the site is proposed due to its accessibility to village services and facilities, very minor heritage constraints, no ecology constraints, medium/low landscape sensitivity and the site being well related to the village.
70. As with Site 129, the Site lies just outside the Conservation Area and the HELAA acknowledges development would cause a low level of harm. New development on the Site would extend the settlement edge further into the open countryside which forms the setting to the Conservation Area eroding its significance. This contrasts with Site 335 where there are no heritage impacts.
71. Further, in terms of promoting sustainable transport, the Site is further from existing bus stops and further from the urban area of Rugby where the majority of services and jobs are located than Site 335. The development of Site 202 for 80 dwellings will not be able to support improvements to sustainable and active travel

routes within Clifton-upon-Dunsmore unlike Site 335 which can deliver an improved foot/cycle connection to Rugby on the Rugby Road.

72. In terms of development traffic flows and impacts, most of the traffic generated by the development site would need to travel through the centre of the village as most vehicle trips would be to/from Rugby and the Houlton Way. The development of this site would also increase traffic movements past the primary school at drop-off and pick-up time, whereas most of the traffic associated with Site 335 would not impact on the village itself.
73. Further, in terms of promoting healthy and safe communities, the Site 202 is further away from the Clifton Recreational Facilities and has no ability to provide land to extend those facilities to meet increased demand arising from an increase in population unlike Site 335 which can deliver an extension to the Recreational Facilities.
74. In landscape terms, this is part of a large, open agricultural field located on the main northern approach road to the village. Its development would remove open countryside overlooked by existing homes within the village. Further, the Site is on rising landform from north to south and is prominent in views from the wider open countryside beyond the village. The Site is less vegetated and less enclosed along its northern and eastern edges and frequently seen in views, especially within its rising topography. Frequent views are broad ranging, likely to be seen from the urban area of Rugby around Brownsover, as well as across the extensive network of PRoW routes including the Shakespeare Way National Trail Long Distance Walking Route passing the site to the east. The Site is also situated on elevated landform and readily seen by users of the main vehicle route approaching the village from the north.
75. The boundaries of the site are weak and do not exist on the northern boundary. The northern edge of the Site would be open and must be reliant on new mitigation planting to integrate the scheme. It is assumed the small remainder of the field would remain as undeveloped, resulting in a field of much smaller scale than that typical of the village edge and the host landscape character area.

76. In landscape and visual terms, Site 202 has greater environmental and amenity value than Site 335.
77. Site 202 should therefore not be allocated as there is a reasonable alternative in Site 335 which has lesser environmental and amenity value.

Site 307 – North Road, Clifton-upon-Dunsmore

78. The HELAA Stage 2 Options Assessment states the site is allocated due the absence of ecology and heritage constraints, accessibility to services and facilities in the village, and medium / low landscape sensitivity.
79. In terms of promoting sustainable transport, the Site is further from existing bus stops and further from the urban area of Rugby where the majority of services and jobs are located than Site 335. The development of Site 307 for 10 dwellings will not be able to support improvements to sustainable and active travel routes within Clifton-upon-Dunsmore unlike Site 335 which can deliver an improved foot/cycle connection to Rugby on the Rugby Road.
80. In terms of development traffic flows and impacts, all of the traffic generated by the development site would need to travel through the centre of the village to access Rugby and the Houlton Way, or to access the A5.
81. The development of this site would also increase traffic movements past the primary school at drop-off and pick-up time, including the junction immediately adjacent to the school entrance, whereas most of the traffic associated with Site 335 would not impact on the village itself.
82. Further, in terms of promoting healthy and safe communities, the Site 307 is further away from the Clifton Recreational Facilities and has no ability to provide land to extend those facilities to meet increased demand arising from an increase in population unlike Site 335 which can deliver an extension to the Recreational Facilities.
83. In landscape and visual terms, the Site is part of a much larger field in open agriculture land beyond the village edge and development would be an adjunct to

the settlement pattern/urban morphology of the village. Landform at the Site is very elevated above the wider open countryside between the village and Brownsover i.e., circa 88m AOD at the edge of Rugby near Brownsover and circa 114m AOD at the Site's eastern edge. The land would be seen across the open countryside especially from the Shakespeare's Way national Trail Long Distance Walking Route to the east passing between the village and Rugby.

84. Development at the Site would also be seen from Station Road passing to and from the western edge of the village. This roadway is circa 96m AOD and the Site is found at circa 114m AOD. The intervening two fields have degraded and gappy hedgerows and limited hedge line trees, and no large field trees within.
85. The Site would extend new development outwards from the current village edge and its influence would be far ranging across the open countryside, which is situated generally lower-lying than that of the Site, and so seen on approaches to the village and from outlying settlements, with broad open views from the settlement edge of Rugby around the Brownsover area. There is scope for the new development to be seen on the skyline.
86. In landscape and visual terms, Site 307 has greater environmental and amenity value than Site 335.
87. Site 307 should therefore not be allocated as there is a reasonable alternative in Site 335 which has lesser environmental and amenity value.

Site 335 – Land East of Rugby Road, Clifton-upon-Dunsmore

88. The HELAA Stage 2 Site Options Assessment highlights that Site 335 has high connectivity and lack of heritage constraints. However, the assessment raises the following concerns which are not accepted.
89. The Assessment refers to a poor relationship with the village and pedestrian connectivity. The site is enclosed on two sides by built development and public open space within the village. The plan at page 9 of Appendix 5 of the HELAA has deleted existing built development from the western boundary to give the impression the site does not adjoin the village. That is incorrect as evidenced from reviewing google maps. The site's relationship to the village is no different

to the other proposed allocations in that it adjoins built form. In fact, it is arguably better related than Site 129 and 307 which only have built development on one boundary. In terms of pedestrian connectivity, Site 335 adjoins the recreation facilities owned by the Parish Council and therefore has the ability to directly access the centre of the village on foot/cycle avoiding main roads. This is more attractive to encourage active travel than the other sites which rely on using footpaths and roads.

90. Further, there is no objection from the Local Highway Authority to the current appeal on Site 335 on grounds of connectivity.
91. The Assessment refers to the proposed areas of separation, however that is a draft designation and does not form part of the Development Plan.
92. The Assessment also refers to the site being of medium landscape sensitivity, but it is of lesser value than the alternative sites.
93. In addition to the above, development of Site 335 should be preferred for the village of Clifton-upon-Dunsmore as it would provide a number of advantages as follows:

Promoting healthy and safe communities (Section 8 of the Framework)

94. There is a greater ability to secure social, recreational and cultural facilities on Site 335 due to the scale of land available, when compared to smaller sites 129, 202 and 307. Furthermore, Site 335 immediately adjoins the village playing fields. It has therefore the ability to offer land to extend this asset to provide more pitches/courts to cater for an increased population within the village, as well as land and contributions to improve the attractiveness of this asset for the village. The Council will be aware from its Playing Pitch and Outdoor Sport Strategy (July 2023) that the existing pitches are poor quality, played to capacity, and with no dedicated parking facility. The recommended actions are to improve quality and increase capacity which is something this proposal alone could help deliver in Clifton Upon Dunsmore. The submission of R25/0565 demonstrates how playing pitches, parking and open space can be achieved on the site alongside residential development.

95. Sites 129, 202 and 307 do not have that ability and will not be able to address their impact on demand for recreation space. This is a clear, positive differential for the site.
96. The Council recognise that piecemeal development leads to missed infrastructure benefits as set out in the Sustainability Appraisal (paragraph 5.4.49). There is therefore acknowledged merit in allocating one site as opposed to three smaller sites.

Promoting sustainable transport (Section 9 of the Framework)

97. Development to the south-west of Clifton is the most logical and sustainable location to extend the settlement from a sustainable transport perspective. As the urban area of Rugby is to the south west of the village, and the growing new community at Houlton is also to the south, locating new development to the south west of the village makes it more likely new residents will use active and sustainable modes of travel to access services and jobs within the urban area. New residents on Site 335 will be at least 1km closer to the urban area than on the alternative sites to the north and east of the village, making it more likely they will walk or cycle to the urban area. Further, the development of Site 335 has the ability to fund improvements to walking and cycling infrastructure on Rugby Road for the benefit of all residents within the village.
98. Site 335 also has the potential to provide more direct active travel connections from the village via the Recreation Ground through the development to the village allotments to the south and to Rugby Road to the west. Providing attractive, direct and safe alternative pedestrian/cycle routes for residents of the village would encourage use of active travel.
99. Further, the majority of trips from residents of the village will be to the urban area of Rugby. When new residents of Site 335 have to use the private car for journeys to the urban area, they will use Rugby Road and not generate through traffic within the village and its Conservation Area. Conversely, all traffic from the alternative sites (129, 202, and 307) have to go through the Conservation Area to the detriment of its character and amenity.

100. In transport terms, Site 335 is therefore more likely to encourage walking and cycling to the urban area of Rugby, and less likely to have negative environmental impacts on the character of the Clifton Conservation Area and its listed buildings when compared to sites 129, 202 and 307.

Conserving and enhancing the natural environment (Section 15 of the Framework)

101. The Framework requires Plans to allocate land with the least environmental or amenity value.

102. In the Sustainability Appraisal (paragraph 5.4.49), it states the principal reason to not carry forward Land east of Rugby Road (Site ID 335) is due to its landscape impacts. Site 335 has been assessed as having a medium overall landscape sensitivity within the Landscape Sensitivity Assessment of Small Sites (December 2025), due to its low boundary hedgerows, interspersed trees and impact of potential development upon key viewpoints identified within the Clifton-upon-Dunsmore Neighbourhood Plan. However, the assessment fails to mention the Neighbourhood Plan is in draft and has not yet been adopted, further the Important Views included within the Draft Clifton-upon-Dunsmore Neighbourhood Plan are not referenced within the assessment of Sites 129, 202 and 307. The assessment states that development on Site 335 is unlikely to alter views from nearby heritage assets within the Clifton-upon-Dunsmore Conservation Area, and that visual impact can be mitigated through vegetation planting along site boundaries. The Illustrative Landscape Masterplan submitted as part of outline application R25/0565 demonstrates significant landscaping can be achieved alongside development.

103. Development of Site 335 maintains an appropriate level of separation between Houlton, Rugby and Clifton-upon-Dunsmore, and will not diminish the sense of separation between these settlements. All built development will be to the rear of properties on Rugby Road and therefore will not be visible from public vantage points when people are travelling between the settlements.

104. The SA refers to Site 335 not relating well to the village. Richborough disagree as the Site's northern boundary immediately adjoins the village playing fields

which are at the heart of the community, and a significant local resource. The Site is also contained on its western side by the existing village, and to the south by the village allotments. It is therefore very well related.

105. The SA also makes reference to concern regarding further piecemeal growth to the east, however the appropriateness of any further growth to the east beyond Site 335 would be a matter for the Council to decide as part of any future Local Plan Review.

106. It is acknowledged that approximately half of Site 335 include Grade 2 agricultural land and approximately half Grade 3 agricultural land, using DEFRA mapping. The Site scores better than Sites 129 and 202, which are both entirely upon Grade 2 agricultural land. It is therefore considered allocations with Clifton-upon-Dunsmore should be directed towards those sites which are not wholly utilising Grade 2 agricultural land.

Conserving and enhancing the historic environment (Section 16 of the Framework)

107. The Framework requires Plans to allocate land with the least environmental or amenity value.

108. As noted above, development of Site 335 will not result in through traffic to Rugby within the Conservation Area of the village. Moreover, development of Site 335 will not impact on the setting of the Conservation Area unlike Sites 129 and 202. Site 335 is therefore of lower environmental and amenity value compared to the alternative sites.

109. In conclusion, Richborough consider Sites 129, 202 and 307 are not justified or consistent with national planning policy, and respectfully request are replaced with Site 335 as an allocation. The land is of lesser environmental and amenity value, is well related to the village and more likely to encourage active travel, has less vehicular impact on the Conservation Area of the village, and has the greatest potential to provide community benefits to mitigate the increase in population within the village.

110. The current planning appeal on Site 335 further demonstrates that residential development raises no technical objection from statutory consultees in relation to Transport, Drainage, Ecology, Heritage, and Infrastructure. All matters are capable of being satisfactorily addressed in accordance with policy, subject to conditions and obligations. That has not been demonstrated in so far as Sites 129, 202 and 307 where there are no planning applications and uncertainty regarding delivery. Site 335 can contribute in full to the Council's five year supply of deliverable housing sites, and Richborough are experienced national land promoters with a track record of bringing land forward quickly and efficiently once outline planning permission has been granted.

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.

111. Site 335 (Land East of Rugby Road, Clifton-upon-Dunsmore) should be included as a residential allocation within the Local Plan, in the place of or in addition to Sites 129, 202 and 307.

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.

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

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

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

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

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

112. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official use
only)

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

Rugby Borough Council Proposed
Submission Local Plan

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Max"/>
Last Name	<input type="text"/>	<input type="text" value="Morgan"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Graduate Planner"/>
Organisation (where relevant)	<input type="text" value="Richborough"/>	<input type="text" value="Marrons"/>
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" value="REDACTED"/>
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:

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

Paragraph	Strategic Priorities – Page 7	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	X
(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.

1. Not sound.
2. The third strategic priority ‘overall pattern and scale of development and conservation’ is not consistent with national policy. The wording is not clearly written and is ambiguous as to what it means.

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.

3. The strategic priority should be re-written to make it clear what the strategic priority of the Local Plan is.

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.

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

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

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

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

4. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

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Part A

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**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="Max"/>
Last Name	<input type="text"/>	<input type="text" value="Morgan"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Graduate Planner"/>
Organisation (where relevant)	<input type="text" value="Richborough"/>	<input type="text" value="Marrons"/>
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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:

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

Paragraph	Objectives – Page 6	Policy		Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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

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

1. Not sound.
2. The Plan Objectives are not justified or consistent with national policy as they fail to include an objective related to meeting housing needs, particularly affordable housing. The Government’s objective is to significantly boost the supply of homes and housing affordability is a key issue in the Borough as evidenced in the HEDNA. Whilst the provision of homes is a strategic priority, the failure to have meeting needs as an objective of the Plan means the Plan is not sound.

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.

3. An objective of the Plan should be to meet the housing needs of the Borough.

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.

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

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Richborough

Land East of Rugby Road, Clifton-upon-Dunsmore

Rugby Local Plan

Proposed Submission Local Plan Consultation (Regulation 19)

March 2026



1. Introduction

1. The following representations are made in response to the Rugby Proposed Submission Plan Consultation (Regulation 19) on behalf of Richborough, in respect of their land interest at Land East of Rugby Road, Clifton-upon-Dunsmore (SA Site Ref: 335), which is part of a larger land parcel promoted (SA Site Ref: 238).

Objectives

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

Paragraph	Objectives – Page 6
Policy	
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

2. Not sound.

3. The Plan Objectives are not justified or consistent with national policy as they fail to include an objective related to meeting housing needs, particularly affordable housing. The Government's objective is to significantly boost the supply of homes and housing affordability is a key issue in the Borough as evidenced in the HEDNA. Whilst the provision of homes is a strategic priority, the failure to have meeting needs as an objective of the Plan means the Plan is not sound.

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.

4. An objective of the Plan should be to meet the housing needs of the Borough.

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

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

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

5. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

Strategic Priorities

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

Paragraph	Strategic Priorities – Page 7
Policy	
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

6. Not sound.

7. The third strategic priority 'overall pattern and scale of development and conservation' is not consistent with national policy. The wording is not clearly written and is ambiguous as to what it means.

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.

8. The strategic priority should be re-written to make it clear what the strategic priority of the Local Plan is.

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

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

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

9. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

Policy S1 Settlement Hierarchy

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

Paragraph	
Policy	S1
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

10. Policy S1 and the identification of Clifton upon Dunsmore as a main rural settlement capable of accommodating development is sound. This policy is justified and evidenced within the Rural Sustainability Study. In addition to facilities within the village, the settlement is well related to Rugby and Houlton and therefore the need to travel for residents is reduced and there is a genuine choice of modes of transport modes to many of its services. Locating new development at Clifton should focus on locations which can improve its connectivity between the village and Rugby and Houlton.
11. However, the second sentence of A. ii. is not sound as it is not positively prepared or justified. The requirement that development will be 'small scale' places an arbitrary limitation without any evidence. These are large rural settlements

capable of accommodating major development, and further growth should not be constrained arbitrarily if it is required to meet the needs of the Borough.

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.

12. The second sentence of A. ii. should be amended to remove ‘and would likely be small scale’.

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

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

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

13. To respond to the Inspector’s questions, elaborate on the points raised, and respond to any further information the Council submits.

S2 Strategy for Homes

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

Paragraph	
Policy	S2
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

14. Not sound

15. The housing requirement and supply within Policy S2 is not positively prepared, justified, effective, or consistent with national policy having regard to the following evidence.

16. In respect of Policy S2 Part A. Housing Requirement, the Plan fails to identify an appropriate housing requirement for the following reasons:

Plan Period

17. The Plan period to 2042 will not look ahead over a minimum of 15 years from adoption. The LDS assumes adoption by June 2027. 15 years from June 2027 is

June 2042. Rugby undertakes its housing monitoring in April of each year, and its housing trajectory therefore only projects and plans for housing delivery until March 2042. There will not therefore be a 15 year plan period.

Unmet Housing Needs

18. The Council needs to ensure they have considered accommodating unmet housing needs arising from outside of the Borough to ensure compliance with the Duty to Cooperate and to ensure that the New Local Plan can meet the positively prepared soundness test set out in Paragraph 36 of the Framework.
19. The adopted Rugby Local Plan provides 2,800 dwellings to meet the unmet needs of Coventry until 2031. Whilst the emerging Coventry Local Plan Review is not envisaging declaring unmet needs for housing, this will need to be monitored prior to submission of the Plan and through the Examination.

Local Housing Need

20. National planning practice guidance is clear that the Local Housing Need derived from the Standard Method may only be relied upon for a period of two years from the time the Local Plan is submitted for Examination. It would therefore be prudent for the Council to review the housing requirement calculated utilising the Local Housing Need derived from the Standard Method prior to Submission.

Affordable Housing Need

21. This section summarises the key indicators of affordable housing need and delivery in Rugby Borough. As part of this, Richborough have considered Rugby Borough Council's (RBC) most recent evidence base documents in respect of housing need.

The National Housing Crisis

22. Affordable housing need has become acute across the country as the affordability of housing has worsened over the past two decades, and the loss of affordable stock has accelerated.

23. The January 2022 House of Lords report ‘Meeting Housing Demand’ identified *“there were 1,187,641 households on local authority housing waiting lists in 2021”* and *“as of March 2021, 95,450 families had been placed into temporary accommodation by local authorities.”*¹
24. Research for the National Housing Federation (NHF) and Crisis in 2018 identified a need for 145,000 new affordable homes per year, of which 90,000 for the next 15 years should be for social rent, 30,000 for affordable rent and 25,000 shared ownership homes.²
25. However, to put this into context, only 64,762 new affordable homes were delivered across England in the most recent year for which data is available (2024/25), approximately 28.2% of all net completions (208,600).
26. Nevertheless, this a gross affordable delivery figure and the Government’s statistics show a loss of 23,060 affordable dwellings in 2024/25 to demolitions and sales.
27. Net affordable completions were therefore only 41,160 (i.e., 19.7% of all housing completions).
28. Furthermore, the House of Lords report stated, *“There has been a steady decline in social rent as a proportion of new supply, from over 75% in 1991/92 to 11% in 2019/20. In 50 local authorities, no homes for social rent were built over the five-year period from 2015/16 to 2019/20”*³ (our emphasis). There is a severe lack of local authority housing as this statement summarises.
29. The Ministry of Housing, Communities & Local Government (MHCLG) publishes data on social housing lettings in England. In its latest publication, updated on 13 November 2025, the department reported that there were 1.34 million households on local authority waiting lists as of 31 March 2025.

¹ Paragraph 69, page 36, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

² Professor Glen Bramley, Crisis and National Housing Federation Housing supply requirements across Great Britain (November 2018)

³ Paragraph 65, page 33, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

30. This represented a 1% increase compared to 31 March 2024. It also was the highest number of households on the waiting list since 2014 when the criteria for accessing the waiting list were tightened under the Localism Act (2011).
31. Furthermore 28% of new social lettings in 2024/25 were to statutorily homeless households, up from 27% in 2023/24.
32. The NHF also undertook research in late 2023 which concluded that unless politicians commit to a long-term plan to fix the housing crisis, an extra 1.7 million households will be living in unaffordable homes by 2030 compared with 2020 - an increase of more than a third (35%).
33. The NHF research also found that by 2030 there will be:
 - 600,000 additional households living in unaffordable private rented homes, taking the total to 2.2 million.
 - 1 million additional homeowners facing unaffordable mortgage costs, taking the total to 1.9 million - more than double current levels.
 - 1.5 million Families will be on the waiting list for social housing, a rise of 350,000 or almost a third (32%).
 - 150,000 children will be homeless and living in emergency accommodation like B&Bs and hostels by 2030 – an increase of 20,000. This is the equivalent of six children in every school in England. ⁴
34. In April 2023 the NHF also found that more than 310,000 children were sharing a bed with their parents or siblings; and the number of homeless children stuck in temporary accommodation reached 130,000 in 2023, the highest number since records began⁵.
35. Marrons 'Housing 2040' report (April 2024) found that approximately 500,000 more affordable homes would be lost by 2040 to demolitions and sales if recent trends continued. ⁶

⁴ The housing crisis: what will happen if we don't act? NHF, August 2023

⁵ Overcrowding in England, NHF, April 2023

⁶ Housing 2040, Marrons, April 2024

36. In the context of the above it is imperative that affordable housing is provided across the country.
37. The remainder of this section considers the housing position in RBC, drawing on key indicators which are publicly available. These indicators include the following:
- Affordable housing need.
 - Gross affordable housing delivery.
 - Affordable stock losses.
 - Net affordable housing delivery.
 - Households on the Council housing waiting list.
 - Homelessness.
 - Temporary accommodation.
 - The affordability of housing.
38. We then consider what unconstrained overall housing need would be if affordable housing need was to be delivered in full. This is set in the context of paragraph 69 of the 2024 NPPF which states *“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.”*

Affordable Housing Need and Delivery in Rugby Borough

39. The most recent evidence base document to determine net affordable need is the ‘Updated Housing Needs Evidence for Rugby Borough’ document published in September 2025. This calculates a need of 474 affordable dwellings per annum (338 per annum unable to buy or rent, and 136 per annum able to rent but not buy).⁷
40. Prior to this Table 8.45 (page 196) of the 2022 Housing and Economic Development Needs Assessment (HEDNA) concluded that affordable need split between rented and affordable home ownership was 495 affordable dwellings per annum from 2022 onwards.

⁷ Page 2, Updated Housing Needs Evidence for Rugby Borough, September 2025

41. Policy H2 (Affordable Housing) of the January 2026 Draft Plan states how 20% affordable housing delivery will be expected on sites of 10 or more dwellings within the Rugby urban area and 30% elsewhere in the Borough. It will be 40% on sites released from the Green Belt through the plan or other Green Belt permissions.⁸
42. This would mean unconstrained overall housing need of 1,185 dpa if affordable housing need were to be met in full, based on 40% delivery being achieved on all sites. Based on 30% delivery this increases to 1,580 dpa.
43. This illustrates how an increase to the Draft Plan’s housing requirement (636 dpa) is needed to deliver more affordable housing in Rugby.
44. Prior to the 2022 HEDNA, the September 2015 Updated Assessment of Housing Need: Coventry-Warwickshire HMA concluded affordable need was 171 dpa based on a 35% rent to income threshold for affordability. This figure increases to 250 dpa based on 30% affordability and 345 dpa for a 25% affordability threshold and our view is that the threshold should be no more than 30%.
45. However, the adopted Rugby Borough Council Local Plan (June 2019) adopted the figure of 171 dpa for the 2011-2031 period.
46. In the context of the above Richborough have therefore assessed affordable housing delivery against the need of 171 dpa (2011/12 to 2021/22), the 2022 HEDNA’s calculation (495 dpa) for the next two years, and 474 dpa in the most recent year.
47. In this context Table 2.1 sets out the affordable delivery published in RBC’s Annual Monitoring Reports (AMRs).

Table 2.1: Affordable Housing Completions in Rugby, 2011/12 to 2024/25

2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
80	92	97	129	46	3	48	163	291	233	125	212	205	120

Sources: Rugby Borough Authority Monitoring Reports

⁸ Page 49, Rugby Borough Proposed submission Local Plan 2025-2042, January 2026

48. As Table 2.1 illustrates, according to RBC’s AMRs there has been gross delivery of 1,844 affordable dwellings since the start of the adopted Local Plan period.
49. However, reference to the Government’s social housing sales and demolitions dataset shows a loss of 916 properties from the social housing stock since 2011/12 as summarised in Table 2.2 below.
50. It should be noted how 75% of the lost stock (708 dwellings) have been demolitions or right to buy sales of local authority owned stock.
51. The above means that net affordable housing completions have only been 808 over the 2011/12 to 2023/24 period (62 affordable dwellings per annum) against a need of 2,700 affordable dwellings based on the Council’s evidence base. This means the Council have failed to deliver their affordable need in 11 of the past 13 years and only 30% of need has been delivered.

Table 2.2: DLUHC figures on the disposal of social housing stock: Rugby Borough

Year	Demolition	LCHO sales	Other sales	Other sales to sitting tenants	Right to Buy	Grand Total
2011-12	-	2	-	-	7	9
2012-13	-	1	1	-	17	19
2013-14	38	5	-	-	22	65
2014-15	1	10	4	3	34	52
2015-16	6	26	13	3	35	83
2016-17	-	7	-	-	26	33
2017-18	-	13	10	3	25	51
2018-19	-	13	2	1	20	36
2019-20	-	13	11	29	24	77
2020-21	-	12	1	2	19	34
2021-22	132	17	-	2	28	179
2022-23	-	13	2	1	25	41
2023-24	221	6	-	1	9	237
2024-25	-	11	2	-	19	32
Grand Total	398	149	46	45	310	948

Source: Social housing sales and demolitions open data, www.gov.uk

Net Affordable Housing Delivery as a Proportion of Overall Housing Delivery

52. Having established the net affordable delivery in RBC since 2011/12, Table 2.3 compares net affordable delivery against net delivery of all housing types.

Table 2.3: Net affordable housing provision as a % of overall housing provision in RBC, 2011/12 to 2023/24

	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	Total
1	71	73	32	77	-37	-30	-3	127	214	199	-54	171	-32	88	896
2.	338	456	448	425	534	376	596	939	859	832	939	1,349	873	676	9,640
3	21%	16%	7%	18%	-7%	-8%	-1%	14%	25%	24%	-6%	13%	-4%	13%	9%

Sources: RBC Annual Monitoring Reports and www.gov.uk

1. Net affordable completions.
2. All net completions.
3. Net affordable completions as a % of net overall completions.

53. Table 2.3 illustrates how net affordable delivery has only been 9% of all housing delivery between 2011/12 and 2024/25.

54. If this level of delivery were to continue and RBC were to deliver their most recent calculation of affordable need (474 dpa) in full, overall housing need would be 5,000 dwellings per annum.

55. This level of overall housing delivery is unrealistic but illustrates how poor the Council's delivery of affordable housing has been since the start of the adopted Local Plan period, and how the housing requirement of the Local Plan should increase as much as possible in order to deliver the affordable housing needed.

Households on the Housing Register

56. The number of homes on the Housing Register can also provide an indication of the need for affordable housing. Table 2.4 provides register data from 2014 when changes to the criteria for accessing housing waiting lists were introduced by the Government in October 2013.

Table 2.4: Rugby Borough Housing Waiting List 2014-2023

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Households	734	701	721	881	1,092	1,062	394	448	646	646	272	465

Source: DLUHC live table 600: local authority waiting lists

57. These changes in 2013 allowed councils to consider whether prospective council tenants had a ‘local connection’ to the area – usually by living in the area, but occasionally working, a condition previously applied to a council’s homelessness duty.
58. The changes made in respect of the waiting list criteria in 2013 led to the waiting list in Rugby dropping from 1,628 households in 2013 to only 734 in 2014, potentially excluding a significant number of households in need. A similar pattern was experienced across the country following the changes.
59. Notwithstanding this change, Table 2.4 shows how the number of households on the waiting list had reduced between 2014 and 2020 but since 2020 has risen again to the most recent position of 465 households.
60. It is important to note that these figures are households, which could contain several people. The number of people on the waiting list is therefore significantly higher. This is considered to emphasise the need for affordable housing in Rugby Borough.

Homelessness

61. In respect of homelessness, Table 2.5 sets out the data collected by MHCLG for the last seven financial years. Data was not collected for Rugby in the 2021/22 and 2022/23 for unknown reasons.

Table 2.5: Homelessness in Rugby, 2018/19 to 2024/25

1. Year	2. Number of households assessed	3. Total households owed a duty	4. Threatened with homelessness - Prevention duty owed	5. Homeless - Relief duty owed
6. 2024/25	7. 415	8. 396	9. 130	10. 266
11. 2023/24	12. 348	13. 336	14. 76	15. 260
16. 2022/23	17. n/a	18. n/a	19. n/a	20. n/a
21. 2021/22	22. n/a	23. n/a	24. n/a	25. n/a
26. 2020/21	27. 324	28. 311	29. 76	30. 235
31. 2019/20	32. 569	33. 548	34. 190	35. 358
36. 2018/19	37. 423	38. 411	39. 153	40. 258

Source: DLUHC

62. Table 2.5 shows how the number of households assessed as being homeless and owed a relief duty has largely remained the same since 2018/19, although it has increased in the last 12 months.

Affordability of housing

63. The lower quartile and median affordability ratios published by the Office for National Statistics (ONS) provide an indication of how the affordability of housing has changed over the recent past.

64. The median workplace-based affordability ratio is used to determine minimum overall housing need using the 2024 NPPF’s standard method. Workplace-based affordability ratios are a measure used to assess housing affordability by comparing house prices in the local authority area to the average incomes of people who work in that area (as opposed to those who live there). This ratio is useful for understanding whether people working in a location can afford to live there.

65. The lower quartile workplace-based affordability ratio measures the multiple of lower quartile earnings required to afford a lower quartile home (i.e., most reasonable 25% of homes). This ratio focuses on how affordable housing is for low-paid workers trying to buy the cheapest homes in the area. It’s a crucial metric for housing policy, especially around essential workers (e.g., teachers, nurses, service workers).

66. Table 2.6 sets out these figures for the past decade for Rugby Borough.

Table 2.6: Median and lower quartile affordability ratio change in Rugby, 2011/12 to 2022/23

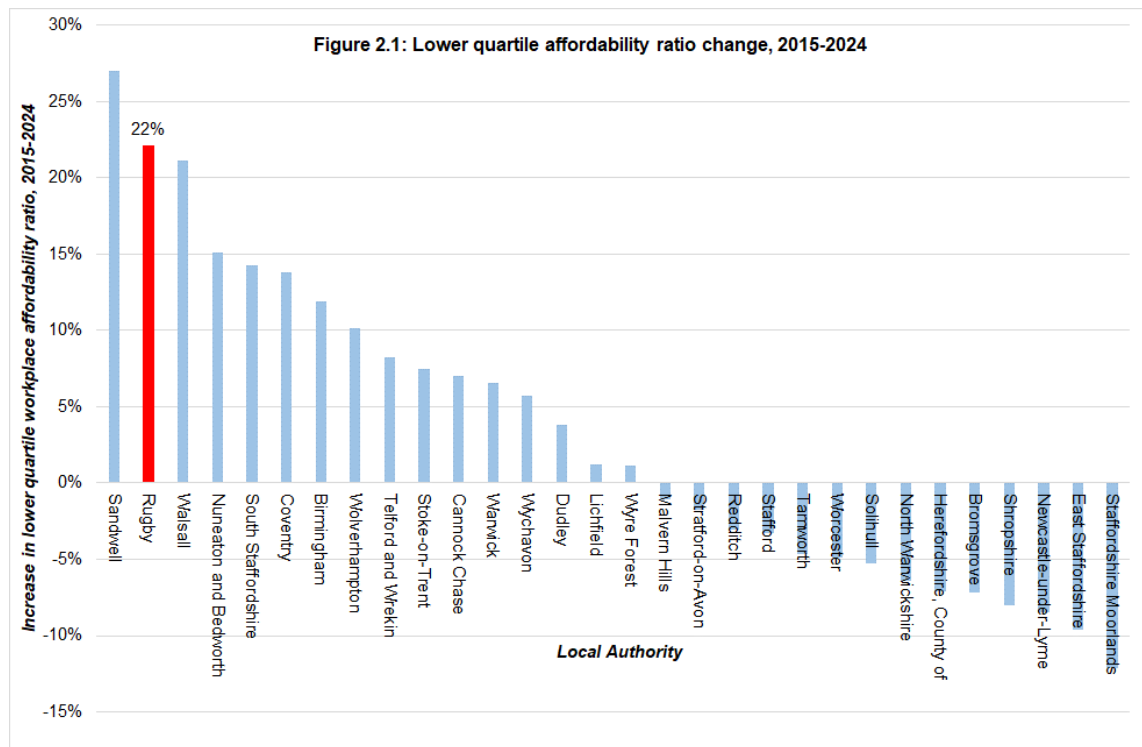
Ratio	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	% change 2014-15 to 2323-24
Lower Quartile	6.15	6.77	7.42	7.56	7.85	7.18	7.99	7.50	7.88	7.51	+22%
Median	6.15	6.50	6.74	7.73	7.72	7.34	7.64	7.66	8.71	7.40	+20%

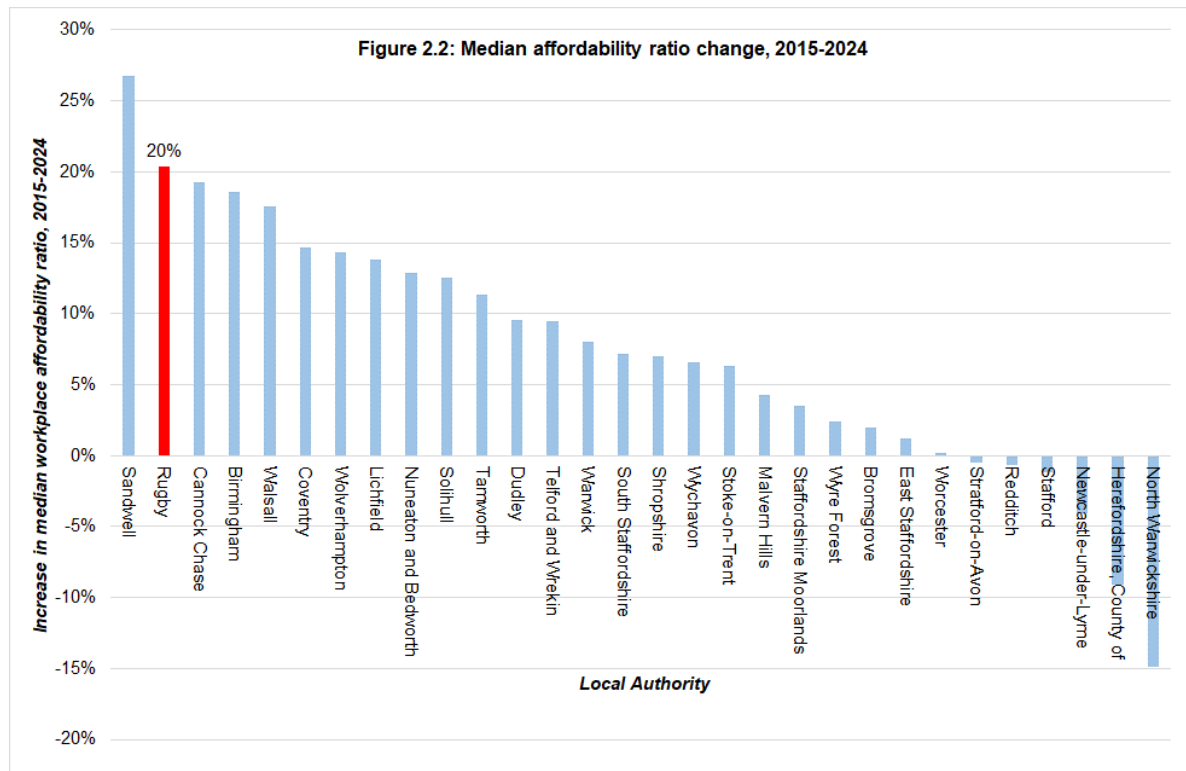
Source: ONS

68. Table 2.6 shows a 22% increase in Rugby’s lower quartile affordability ratio over the past decade. Only one other authority (Sandwell) of 30 in the West Midlands region have experienced a higher increase in their lower quartile affordability ratio. Several have seen their ratios fall over this period indicating an improvement in affordability. Figure 2.1 illustrates this data.

69. The median ratio change over the past decade has been similarly high at 20%. This is again the 2nd highest increase in the region behind Sandwell again and is illustrated in Figure 2.2 against all other West Midlands authorities.

70. As of 2023/24 Rugby has a median ratio of 7.40 and a lower quartile ratio of 7.51 meaning home ownership is out of reach for the vast majority of people who work in the Borough.





Summary

71. In summary the key points from this section are as follows:

- Affordable need was determined by the Council’s evidence base as 171 dpa 2011-2031, however this was superseded by 495 dpa from 2022-2024, and the most recent assessment shows 474 dpa 2025-2042.
- Gross affordable delivery was 1,844 dwellings 2011/12 to 2024/25 (132 dpa).
- Affordable stock losses were 948 from 2011/12 to 2024/25 (68 dpa).
- Net delivery has therefore been 896 dwellings since 2011/12 (64 dpa).
- This represents a shortfall of 2,278 dwellings from 2011/12 to 2024/25.
- Put another way less than 30% of need since 2011/12 has been delivered.
- The number of households on the waiting list is 465.
- The waiting list has risen by 71% in the past 12 months.
- The number of households assessed as homeless in 2024/25 (266) exceeds the 2018/19 figure (258).
- The 22% increase in Rugby’s lower quartile affordability ratio over the past decade is the second highest in the West Midlands region.
- The 20% increase in Rugby’s median affordability ratio over the past decade is also the second highest in the West Midlands region.

Demographic Growth

72. The first Office for National Statistics (ONS) local authority household projections (2022-based) in over five years were published on 28th October 2025, based on the 2022-based Sub National Population Projections (SNPP, 24th June 2025).
73. As they are linked to the 2021 Census the projections are not affected by the overestimating issues identified for the 2014-based household projections which formed the baseline need of the 2023 NPPF's standard method.
74. In the context of the NPPF and emerging NPPF stating how the housing requirement could exceed standard method need, and these projections being the most recent, there is justification to consider them in respect of Rugby.

2022-based ONS Household Projections – Rugby

75. The 2022-based household projections incorporate several variant projections, and Richborough consider these below. It should be noted that ONS recommend use of the 'migration category variant' projections scenario. This is because the ONS explain that it better reflects international migration patterns.
76. The additional variant projections are as follows:
- a five-year migration variant (consistent with the national population projections principal projection)
 - a 10-year migration variant
 - a high international migration variant
 - a projected household representative rates (HRR) variant, projected throughout
 - a low international migration variant
 - a zero net migration variant
77. Table 3.1 lists the projections for Rugby over the proposed Plan period.

Table 3.1: 2022 Household Projections for Rugby, 2025-2042

Variant Projection	2025 Households	2042 Households	Households 2025-2042 (per annum)	Dwellings 2025-2042 (per annum)
High international migration	50,004	65,107	15,103 (888)	15,556 (915)
Five-year migration	49,982	62,406	12,424 (731)	12,797 (753)
Migration variant	49,887	61,781	11,894 (700)	12,251 (721)
Ten-year migration	49,858	61,117	11,259 (662)	11,597 (682)
Low international migration	49,955	59,207	9,252 (544)	9,600 (561)
HRRs projected throughout	49,537	59,056	9,519 (560)	9,805 (577)

Source: ONS

78. ONS' preferred projection is highlighted yellow and projects 700 households per annum (hpa), 2025-2042. A vacancy rate of 3% in Rugby is applied to arrive at 721 dwellings per annum (dpa), 2025-2042. This would equate to 85 additional dpa, and 1,445 additional dwellings over the proposed Plan period.

79. However, the five-year migration trend scenario would lead to an additional 1,989 dwellings over the Plan period, and the high international migration scenario, 4,743 additional dwellings.

80. The 10-year migration scenario is lower than the ONS' preferred migration variant but would still require an uplift of 782 dwellings over the Plan period.

81. Only the low international migration variant, and the variant where household representative rates (an unlikely scenario) show a lower need than the 636 dpa proposed as the housing requirement in the Draft Plan.
82. The low international migration variant assumes positive net international migration of 108,500 people per annum across the country from the year ending 2030. This should be considered in the context of net international migration to the UK which has only ever been recorded at that number or below in three quarters since 2012. All three quarters where the figure was lower included the COVID-19 Pandemic period when international travel was severely restricted.
83. Furthermore, since the end of the COVID-19 Pandemic net international migration has been a minimum of 204,000 people and a maximum of 944,000 people. The average has been 610,000 people.
84. Since 2012 the average has been approximately 370,000 people per annum on average.
85. The ONS' preferred migration variant is underpinned by only 306,600 people per annum from 2030 onwards, and the high international variant based on 476,500 people per annum from 2030 onwards.
86. In the context of the average net international migration being recorded at an average of 610,000 people per annum since the end of COVID-19 restrictions, the preferred household projection and the high international migration variant are both considered more realistic than the low international migration variant.
87. It is also imperative to consider that these are baseline projections. They make no further adjustment for affordability, as was applied in the previous standard method and the current standard method. This would increase all these figures even further.

Summary

88. In summary this section has illustrated how the most up-to-date baseline demographic projections indicate that household growth in Rugby will exceed the 636 dpa housing requirement being proposed in the Draft Plan.
89. The preferred variant of the 2022-based household projections indicates an increase of approximately 1,500 homes over the Plan period based on a conservative estimate of international net migration to the country.
90. This increases to nearly 2,000 additional dwellings under the variant historically preferred by the ONS (five-year migration) and nearly 5,000 based on the high international migration variant which is underpinned by a level of net international migration which has been regularly exceeded recently and is therefore considered realistic.

Housing Requirement Conclusion

91. On the evidence outlined above, there is a clear need to increase the housing requirement beyond the Standard Method to a minimum of 721 dpa. However, based on past delivery rates, circa 1,000 dpa is realistic and achievable in the context to align with Government objectives to boost housing supply. Housing delivery in Rugby has averaged 965dpa since 2018/19, despite the national slowdown experienced during the COVID-19 pandemic. In 2022/23 net completions, reached 1,349 dwellings.
92. Failure to do so would exacerbate the poor affordability of Rugby and fail to acknowledge the desires of the Government as clearly set out in the Framework.

Sustainability Appraisal

93. The Sustainability Appraisal fails to adequately test higher growth options in terms of housing. It has only tested higher growth scenarios aligned to three strategic options, and should have considered an alternative scenario that provided for higher growth dispersed to the main rural settlements.

Sources of Supply

94. In respect of Policy S2 Part B. Sources of Supply, the Plan fails to demonstrate a sufficient supply of sites to meet the housing requirement or specific deliverable sites for the first 5 years of the Plan period.
95. Policy S2 B. places over reliance on larger sites. Over 60% of the housing need to be met within the new Local Plan is to come from the three strategic housing allocations adopted through the current Local Plan (South West Rugby, Houlton and Eden Park). If for any reason these sites do not come forward at pace over the Plan period (particularly South West Rugby delivering over 300 dpa for three consecutive years and an average of over 200 dpa across the Plan period), the Plan will fail in so far as meeting housing need and delivering a five year supply on adoption.
96. Notwithstanding the housing trajectory provided, there is an absence of evidence to demonstrate the housing delivery rates on South West Rugby and Houlton will be achieved within the Plan period.
97. In respect of other sources of supply, it is noted that the housing trajectory relies on 850 dwellings from windfalls (50 dwellings per annum). The inclusion of a windfall allowance for each year of the Plan period is unsound given the likelihood of double counting with sites with planning permission also taken into account in the supply. The windfall allowance should therefore be reduced by 150 dwellings to remove the first three years of the plan period to avoid double counting.

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.

98. Policy S2 Part A. and the housing requirement should be amended to reflect an extended plan period to provide a minimum of 15 years, and to provide at least 721 dwellings per annum.
99. Policy S2 Part B. and the housing supply should be amended to increase the supply from allocations under Policy S6 to meet the amended housing requirement with a buffer of at least 10%. This should include the allocation of land east of Rugby Road, Clifton-upon-Dunsmore.

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

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

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

100. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

S6 Residential Allocations

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

Paragraph	
Policy	S6
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

101. Not sound.

102. Richborough object to the allocation of Site 129 (Land North of Lilbourne Road), Site 202 (Newton Road) and Site 307 (North Road) as they are not justified as an appropriate strategy having regard to reasonable alternatives which in this case is the western part of Site 238 (Land east of Rugby Road, Clifton upon Dunsmore), identified as Site 335. As identified in paragraph 5.4.49 of the SA, Site 335 can be delivered in place of the three draft allocations. Further, the allocations are not consistent with national policy as paragraph 188 of the Framework requires plans to allocate land with the least environmental or amenity value.

Site 129 – Land North of Lilbourne Road, Clifton-upon-Dunsmore

103. The Rugby Borough HELAA Stage 2 Site Options Assessment (December 2025) states Site 129 is proposed for allocation due to its better relationship with the village and lower heritage constraints than other assessed sites within Clifton-upon-Dunsmore. That statement is not correct. The HELAA states that the site is an important element of the historic approach to the village, contributing to the rural backdrop of the conservation area and its listed buildings. The site is located adjacent to the Clifton-upon-Dunsmore Conservation Area, and is located within 75 metres of a Grade II listed building on Hillmorton Lane. This contrasts with Site 335 where there are no heritage impacts.
104. Further, in terms of promoting sustainable transport, the Site is further from existing bus stops and further from the urban area of Rugby where the majority of services and jobs are located than Site 335. The development of Site 129 for 60 dwellings will not be able to support improvements to sustainable and active travel routes within Clifton-upon-Dunsmore unlike Site 335 which can deliver an improved foot/cycle connection to Rugby on the Rugby Road.
105. In terms of development traffic flows and impacts, a significant proportion of the traffic generated by the development site would need to travel through the centre of the village as most vehicle trips would be to/from Rugby and the Houlton Way, and there are turning restrictions at the Hillmorton Lane junction to the south.
106. The development of this site would also increase traffic movements past the primary school at drop-off and pick-up time, whereas most of the traffic associated with Site 335 would not impact on the village itself.
107. Further, in terms of promoting healthy and safe communities, the Site 129 is further away from the Clifton Recreational Facilities and has no ability to provide land to extend those facilities to meet increased demand arising from an increase in population unlike Site 335 which can deliver an extension to the Recreational Facilities.
108. In landscape and visual terms, this land is on the eastern edge of the village and its development would be an adjunct to the settlement pattern/morphology of the

village. This land is situated off the main eastern vehicle approach to the village and would be prominent in views for road users to and from the village. The open countryside beyond is open in nature and gently rolling through which, there is a network of PRow passing, including the Shakespeare Way National Trail Long Distance Walking Route passing the site to the east. The Site would also be seen by road users passing to and from the village, and so is located in a gateway position especially given it has an open aspect and readily seen.

109. The land is outside a well treed edge to the village so would be experienced as outside of the village's edge in its sensory and perceptual sense, and more in the open countryside beyond. The Site would therefore extend new development outwards from the current village edge and its influence would be far ranging across the open countryside, which is situated generally lower-lying than that of the Site, and so seen on approaches to the village and from outlying settlements.

110. In landscape and visual terms, Site 129 has greater environmental and amenity value than Site 335.

111. Site 129 should therefore not be allocated as there is a reasonable alternative in Site 335 which has lesser environmental and amenity value.

Site 202 – Newton Road, Clifton-upon-Dunsmore

112. The HELAA Stage 2 Options Assessment states the site is proposed due to its accessibility to village services and facilities, very minor heritage constraints, no ecology constraints, medium/low landscape sensitivity and the site being well related to the village.

113. As with Site 129, the Site lies just outside the Conservation Area and the HELAA acknowledges development would cause a low level of harm. New development on the Site would extend the settlement edge further into the open countryside which forms the setting to the Conservation Area eroding its significance. This contrasts with Site 335 where there are no heritage impacts.

114. Further, in terms of promoting sustainable transport, the Site is further from existing bus stops and further from the urban area of Rugby where the majority of services

- and jobs are located than Site 335. The development of Site 202 for 80 dwellings will not be able to support improvements to sustainable and active travel routes within Clifton-upon-Dunsmore unlike Site 335 which can deliver an improved foot/cycle connection to Rugby on the Rugby Road.
115. In terms of development traffic flows and impacts, most of the traffic generated by the development site would need to travel through the centre of the village as most vehicle trips would be to/from Rugby and the Houlton Way. The development of this site would also increase traffic movements past the primary school at drop-off and pick-up time, whereas most of the traffic associated with Site 335 would not impact on the village itself.
116. Further, in terms of promoting healthy and safe communities, the Site 202 is further away from the Clifton Recreational Facilities and has no ability to provide land to extend those facilities to meet increased demand arising from an increase in population unlike Site 335 which can deliver an extension to the Recreational Facilities.
117. In landscape terms, this is part of a large, open agricultural field located on the main northern approach road to the village. Its development would remove open countryside overlooked by existing homes within the village. Further, the Site is on rising landform from north to south and is prominent in views from the wider open countryside beyond the village. The Site is less vegetated and less enclosed along its northern and eastern edges and frequently seen in views, especially within its rising topography. Frequent views are broad ranging, likely to be seen from the urban area of Rugby around Brownsover, as well as across the extensive network of PRoW routes including the Shakespeare Way National Trail Long Distance Walking Route passing the site to the east. The Site is also situated on elevated landform and readily seen by users of the main vehicle route approaching the village from the north.
118. The boundaries of the site are weak and do not exist on the northern boundary. The northern edge of the Site would be open and must be reliant on new mitigation planting to integrate the scheme. It is assumed the small remainder of the field would remain as undeveloped, resulting in a field of much smaller scale than that typical of the village edge and the host landscape character area.
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119. In landscape and visual terms, Site 202 has greater environmental and amenity value than Site 335.
120. Site 202 should therefore not be allocated as there is a reasonable alternative in Site 335 which has lesser environmental and amenity value.

Site 307 – North Road, Clifton-upon-Dunsmore

121. The HELAA Stage 2 Options Assessment states the site is allocated due the absence of ecology and heritage constraints, accessibility to services and facilities in the village, and medium / low landscape sensitivity.
122. In terms of promoting sustainable transport, the Site is further from existing bus stops and further from the urban area of Rugby where the majority of services and jobs are located than Site 335. The development of Site 307 for 10 dwellings will not be able to support improvements to sustainable and active travel routes within Clifton-upon-Dunsmore unlike Site 335 which can deliver an improved foot/cycle connection to Rugby on the Rugby Road.
123. In terms of development traffic flows and impacts, all of the traffic generated by the development site would need to travel through the centre of the village to access Rugby and the Houlton Way, or to access the A5.
124. The development of this site would also increase traffic movements past the primary school at drop-off and pick-up time, including the junction immediately adjacent to the school entrance, whereas most of the traffic associated with Site 335 would not impact on the village itself.
125. Further, in terms of promoting healthy and safe communities, the Site 307 is further away from the Clifton Recreational Facilities and has no ability to provide land to extend those facilities to meet increased demand arising from an increase in population unlike Site 335 which can deliver an extension to the Recreational Facilities.

126. In landscape and visual terms, the Site is part of a much larger field in open agriculture land beyond the village edge and development would be an adjunct to the settlement pattern/urban morphology of the village. Landform at the Site is very elevated above the wider open countryside between the village and Brownsover i.e., circa 88m AOD at the edge of Rugby near Brownsover and circa 114m AOD at the Site's eastern edge. The land would be seen across the open countryside especially from the Shakespeare's Way national Trail Long Distance Walking Route to the east passing between the village and Rugby.
127. Development at the Site would also be seen from Station Road passing to and from the western edge of the village. This roadway is circa 96m AOD and the Site is found at circa 114m AOD. The intervening two fields have degraded and gappy hedgerows and limited hedge line trees, and no large field trees within.
128. The Site would extend new development outwards from the current village edge and its influence would be far ranging across the open countryside, which is situated generally lower-lying than that of the Site, and so seen on approaches to the village and from outlying settlements, with broad open views from the settlement edge of Rugby around the Brownsover area. There is scope for the new development to be seen on the skyline.
129. In landscape and visual terms, Site 307 has greater environmental and amenity value than Site 335.
130. Site 307 should therefore not be allocated as there is a reasonable alternative in Site 335 which has lesser environmental and amenity value.

Site 335 – Land East of Rugby Road, Clifton-upon-Dunsmore

131. The HELAA Stage 2 Site Options Assessment highlights that Site 335 has high connectivity and lack of heritage constraints. However, the assessment raises the following concerns which are not accepted.
132. The Assessment refers to a poor relationship with the village and pedestrian connectivity. The site is enclosed on two sides by built development and public open space within the village. The plan at page 9 of Appendix 5 of the HELAA has
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deleted existing built development from the western boundary to give the impression the site does not adjoin the village. That is incorrect as evidenced from reviewing google maps. The site's relationship to the village is no different to the other proposed allocations in that it adjoins built form. In fact, it is arguably better related than Site 129 and 307 which only have built development one boundary. In terms of pedestrian connectivity, Site 335 adjoins the recreation facilities owned by the Parish Council and therefore has the ability to directly access the centre of the village on foot/cycle avoiding main roads. This is more attractive to encourage active travel than the other sites which rely on using footpaths and roads.

133. Further, there is no objection from the Local Highway Authority to the current appeal on Site 335 on grounds of connectivity.
134. The Assessment refers to the proposed areas of separation, however that is a draft designation and does not form part of the Development Plan.
135. The Assessment also refers to the site being of medium landscape sensitivity, but it is of lesser value than the alternative sites.
136. In addition to the above, development of Site 335 should be preferred for the village of Clifton-upon-Dunsmore as it would provide a number of advantages as follows:

Promoting healthy and safe communities (Section 8 of the Framework)

137. There is a greater ability to secure social, recreational and cultural facilities on Site 335 due to the scale of land available, when compared to smaller sites 129, 202 and 307. Furthermore, Site 335 immediately adjoins the village playing fields. It has therefore the ability to offer land to extend this asset to provide more pitches/courts to cater for an increased population within the village, as well as land and contributions to improve the attractiveness of this asset for the village. The Council will be aware from its Playing Pitch and Outdoor Sport Strategy (July 2023) that the existing pitches are poor quality, played to capacity, and with no dedicated parking facility. The recommended actions are to improve quality and increase capacity which is something this proposal alone could help deliver in Clifton Upon Dunsmore. The submission of R25/0565 demonstrates how playing pitches, parking and open space can be achieved on the site alongside residential development.
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138. Sites 129, 202 and 307 do not have that ability and will not be able to address their impact on demand for recreation space. This is a clear, positive differential for the site.
139. The Council recognise that piecemeal development leads to missed infrastructure benefits as set out in the Sustainability Appraisal (paragraph 5.4.49). There is therefore acknowledged merit in allocating one site as opposed to three smaller sites.

Promoting sustainable transport (Section 9 of the Framework)

140. Development to the south-west of Clifton is the most logical and sustainable location to extend the settlement from a sustainable transport perspective. As the urban area of Rugby is to the south west of the village, and the growing new community at Houlton is also to the south, locating new development to the south west of the village makes it more likely new residents will use active and sustainable modes of travel to access services and jobs within the urban area. New residents on Site 335 will be at least 1km closer to the urban area than on the alternative sites to the north and east of the village, making it more likely they will walk or cycle to the urban area. Further, the development of Site 335 has the ability to fund improvements to walking and cycling infrastructure on Rugby Road for the benefit of all residents within the village.
141. Site 335 also has the potential to provide more direct active travel connections from the village via the Recreation Ground through the development to the village allotments to the south and to Rugby Road to the west. Providing attractive, direct and safe alternative pedestrian/cycle routes for residents of the village would encourage use of active travel.
142. Further, the majority of trips from residents of the village will be to the urban area of Rugby. When new residents of Site 335 have to use the private car for journeys to the urban area, they will use Rugby Road and not generate through traffic within the village and its Conservation Area. Conversely, all traffic from the alternative sites (129, 202, and 307) have to go through the Conservation Area to the detriment of its character and amenity.

143. In transport terms, Site 335 is therefore more likely to encourage walking and cycling to the urban area of Rugby, and less likely to have negative environmental impacts on the character of the Clifton Conservation Area and its listed buildings when compared to sites 129, 202 and 307.

Conserving and enhancing the natural environment (Section 15 of the Framework)

144. The Framework requires Plans to allocate land with the least environmental or amenity value.

145. In the Sustainability Appraisal (paragraph 5.4.49), it states the principal reason to not carry forward Land east of Rugby Road (Site ID 335) is due to its landscape impacts. Site 335 has been assessed as having a medium overall landscape sensitivity within the Landscape Sensitivity Assessment of Small Sites (December 2025), due to its low boundary hedgerows, interspersed trees and impact of potential development upon keys viewpoints identified within the Clifton-upon-Dunsmore Neighbourhood Plan. However, the assessment fails to mention the Neighbourhood Plan is in draft and has not yet been adopted, further the Important Views included within the Draft Clifton-upon-Dunsmore Neighbourhood Plan are not referenced within the assessment of Sites 129, 202 and 307. The assessment states that development on Site 335 is unlikely to alter views from nearby heritage assets within the Clifton-upon-Dunsmore Conservation Area, and that visual impact can be mitigated through vegetation planting along site boundaries. The Illustrative Landscape Masterplan submitted as part of outline application R25/0565 demonstrates significant landscaping can be achieved alongside development.

146. Development of Site 335 maintains an appropriate level of separation between Houlton, Rugby and Clifton-upon-Dunsmore, and will not diminish the sense of separation between these settlements. All built development will be to the rear of properties on Rugby Road and therefore will not be visible from public vantage points when people are travelling between the settlements.

147. The SA refers to Site 335 not relating well to the village. Richborough disagree as the Site's northern boundary immediately adjoins the village playing fields which are at the heart of the community, and a significant local resource. The Site is also

- contained on its western side by the existing village, and to the south by the village allotments. It is therefore very well related.
148. The SA also makes reference to concern regarding further piecemeal growth to the east, however the appropriateness of any further growth to the east beyond Site 335 would be a matter for the Council to decide as part of any future Local Plan Review.
149. It is acknowledged that approximately half of Site 335 include Grade 2 agricultural land and approximately half Grade 3 agricultural land, using DEFRA mapping. The Site scores better than Sites 129 and 202, which are both entirely upon Grade 2 agricultural land. It is therefore considered allocations with Clifton-upon-Dunsmore should be directed towards those sites which are not wholly utilising Grade 2 agricultural land.

Conserving and enhancing the historic environment (Section 16 of the Framework)

150. The Framework requires Plans to allocate land with the least environmental or amenity value.
151. As noted above, development of Site 335 will not result in through traffic to Rugby within the Conservation Area of the village. Moreover, development of Site 335 will not impact on the setting of the Conservation Area unlike Sites 129 and 202. Site 335 is therefore of lower environmental and amenity value compared to the alternative sites.
152. In conclusion, Richborough consider Sites 129, 202 and 307 are not justified or consistent with national planning policy, and respectfully request are replaced with Site 335 as an allocation. The land is of lesser environmental and amenity value, is well related to the village and more likely to encourage active travel, has less vehicular impact on the Conservation Area of the village, and has the greatest potential to provide community benefits to mitigate the increase in population within the village.
153. The current planning appeal on Site 335 further demonstrates that residential development raises no technical objection from statutory consultees in relation to

Transport, Drainage, Ecology, Heritage, and Infrastructure. All matters are capable of being satisfactorily addressed in accordance with policy, subject to conditions and obligations. That has not been demonstrated in so far as Sites 129, 202 and 307 where there are no planning applications and uncertainty regarding delivery. Site 335 can contribute in full to the Council’s five year supply of deliverable housing sites, and Richborough are experienced national land promoters with a track record of bringing land forward quickly and efficiently once outline planning permission has been granted.

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.

154. Site 335 (Land East of Rugby Road, Clifton-upon-Dunsmore) should be included as a residential allocation within the Local Plan, in the place of or in addition to Sites 129, 202 and 307.

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

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

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

155. To respond to the Inspector’s questions, elaborate on the points raised, and respond to any further information the Council submits.

EN4 Areas of Separation

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

Paragraph	
Policy	EN4
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

156. Policy EN4 is not justified or consistent with national policy for a number of reasons.

157. Firstly, the Framework at Paragraph 16 criterion c) advises that Plan-making should “be shaped by early, proportionate and effective engagement between plan-makers and communities, businesses”. There has been no engagement or consultation on Policy EN4 prior to the publication of the Regulation 19 Plan. Landowners and land promoters within those areas were not consulted formally or informally prior to its inclusion in this Publication Draft. This is a breach of the Council’s Statement of Community Involvement and contrary to the Framework.

158. Secondly, previous Areas of Separation from the 1990s were dropped from the previous Local Plan adopted in 2011, and not included in the current adopted Plan in 2019. The previous policy support for their inclusion in the 1990s was the then

- Warwickshire Structure Plan. That support no longer exists, and there is no support in national policy either for the inclusion of Areas of Separation. References in the Area of Separation Study Report to policies of the Framework relate to conservation of the natural, built and historic environment but not to areas of separation.
159. Thirdly, the policy is not justified as it is not supported by proportionate evidence, which is clear, and fails to provide a robust justification for the policy. The evidence is weak.
160. The policy is a criteria-based policy, setting out the criteria by which development will be assessed and considered acceptable.
161. The purpose of the policy is avoiding coalescence and retaining the separate identity of settlements; rather than protecting high quality landscapes in the urban fringe and provide access to the countryside. However, within the Areas of Separation Report (2025) there is no reference or a list of criterion by which to assess the “identify and distinctiveness of settlements”. Only an assertion that the evaluation of settlement “primarily relies upon information drawn from conservation appraisals and parish or neighbourhood” (paragraph 5.6). As a result, it is considered that the approach adopted lacks clarity and transparency and does not provide a criterion for an independent assessment. This is a fundamental flaw within the evidence to justify the policy’s inclusion within the Plan.
162. Whilst the evidence does go on to list a criterion by which land within an assessment area is deemed to make a stronger contribution to settlement identity. The following is the only criteria which they list:
- It is an important part of a settlement’s setting;
 - It features prominently in the views to and from the settlement;
 - It provides a clear sense of arrival to or departure from the settlement; or,
 - It contributes positively to a conservation area’.
163. However, this approach lacks transparency and a scoring mechanism for examination, and is a deficiency, i.e. how did the Council, or an independent assessor, define less than a ‘stronger contribution’.

164. Unfortunately, this situation is further replicated through the LPA's methodology for examining the Physical and Visual Separation and Urbanising Influences. Again, the evidence attempts to only define 'stronger contribution'.
165. Paragraph 5.7 of the Areas of Separation Report 2025, advises that land within an assessment area is deemed to make a stronger contribution to settlement identify and lists four criteria, however, there is no methodology to determine how "Strong contribution" is defined or indeed any information to say what less than a strong contribution means.
166. The same lack of definition relates to how "*important part*" of settlements have been defined, along with "*it features prominently in the views to and from the settlement*" and how prominent and positive contributions have been arrived at, without this information it is not possible to understand how this has been judged.
167. Concern is also raised over the criteria assessing the nature of arriving and departing to and from the settlement, it is not known where this is being assessed from, for example what types of routes would the receptor be passing along.
168. In addition, there is also a lack of definition in terms of the approaches taken for the physical and visual separation and the urban influences, with only a definition given for *stronger contribution*.
169. The methodology used to inform the policy is insufficient as it is inadequate and lacks clarity. The methodology does not demonstrate how the relative importance of the land parcels has been defined.
170. It is unclear as to what specialist technical input has been utilised in the preparation of the report, for example, heritage, conservation officer, landscape architect. The methodology section refers to a desk top based exercise being undertaken supplemented by planning officers have walked through and around the assessment area.
171. In summary, the policy is not sound as it is not justified for the following reasons:

- The Methodology/Approach is deficient, lacking in the definition of terms, and their detail of terms.
 - The methodology is insufficiently explained and lack clarity for an independent assessment.
 - The use of the Methodology/Approach seems to have been used to only support higher contribution land (in order to support their justification for the Area of Separation).
 - The Methodology lacks detail and appears to be poorly explained and is insufficiently robust.
 - There is a lack of defining the scope and purpose of the study.
 - Who undertook the assessment and field-based assessment, their qualifications and experience i.e., Planner, Masterplanner, Landscape Architects?
 - Time of year when the field-based assessment was undertaken?
172. As a result, the policy and the evidence base used to support the policy is not justified as it fails to take into account reasonable alternatives that could have been used as opposed to proposing an Area of Separation Policy.

Site Specific comments on Land East of Rugby Road, Clifton-upon-Dunsmore (Site ID 238/335).

173. Given that the Council has not published its appraisal of smaller land parcels between Clifton upon Dunsmore and the urban edge of Rugby to the southeast and south, or that to the west northwest, Richborough must consider that the stated level of contribution is that of the overall, broad area:

‘The area between Rugby and Clifton upon Dunsmore contributes strongly to the separation of the two settlements, barring the ribbon development which connects the two along Rugby Road. Therefore, there is a clear opportunity to designate an area of separation in this location’

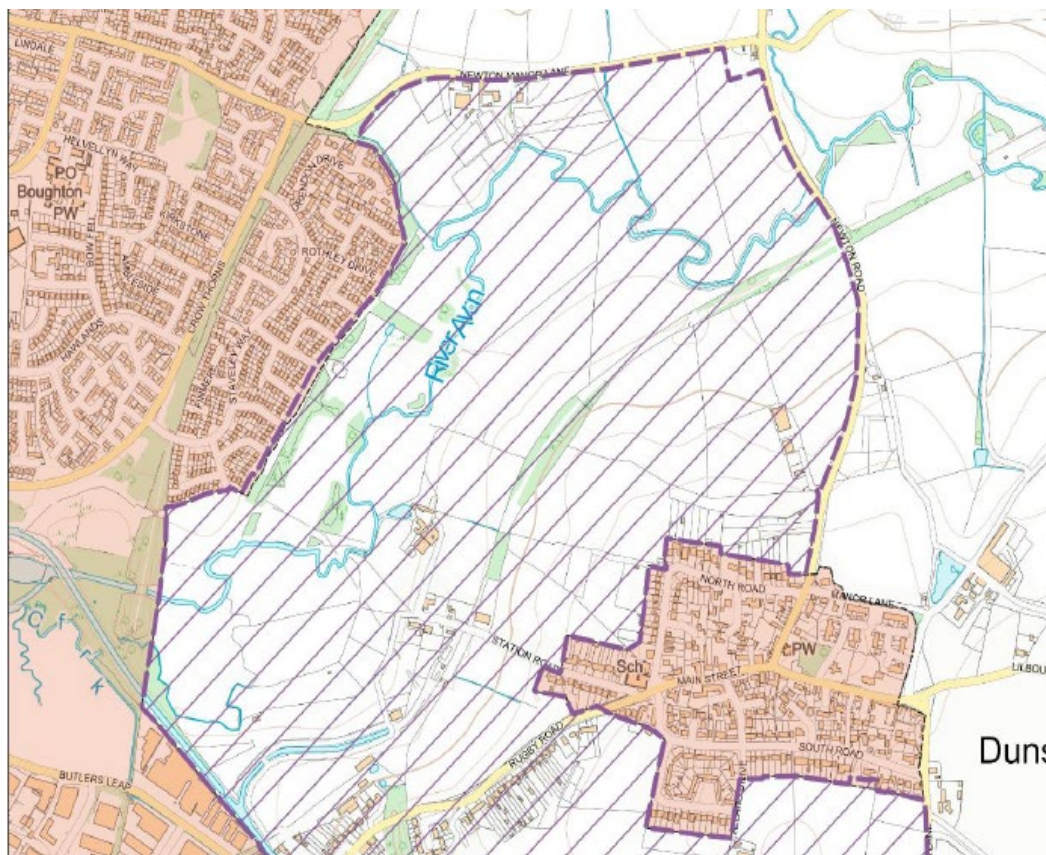
174. In their description, the Council recognise a number of existing urban, developed land or infrastructure features which it has utilised to define the boundaries to the broad area by which they are proposing the Area of Separation within. Some of

these features are noted by the Council at paragraph 6.1 of the Area of Separation Study:

‘The assessment area is bounded by the railway line to the south, by Hillmorton Lane and Newton Road to the east, by Newton Manor Lane to the north, and by the Butlers Leap employment area and residential properties off Staveley Way to the west’.

175. However, from our field-based assessment, Richborough finds that the southern part of the proposed Area of Separation is defined differently to that of the western part. Specifically, land to the west of the village is predominantly rural, agricultural fields delineated with hedgerows and hedge line trees. There are small, wooded groups along the River Avon; see Image 1:

Extract from the Rugby Borough Council’s Area of Separation Study (published November 2025), PDF page 20, Figure 5: Rugby – Clifton upon Dunsmore assessment area



176. Whereas land to the south of the village is similarly managed as agricultural fields neighbouring the village, landform falls away down to a number of robust man-made features include Houlton Way roadway, the Oxfordshire Canal (as well as roadway bridge on Houlton Way over the canal) as well as the Rugby Golf Club. The periphery of the proposed Areas of Separation south of the village is defined by the main railway line running along the eastern edge of Rugby town, beyond which there is extensive residential development and employment-built form and land uses off Butlers Leap. Clifton Brook runs through the Golf Club and also Bluebell Woods to the southwestern edge of the area too.
177. Given this, the western edge of the proposed Area of Separation is more plainly defined by a woodland block, existing residential development and Newton Manor Lane, a local vehicle route with only open countryside situated between Rugby and the village. However, the southern area contains several significant man-made physical features within, which in themselves individually are as durable as those defining the quantum of the proposed western area.
178. From the Area of Separation Study (November 2025), the Council consider the proposed Rugby–Clifton upon Dunsmore Area of Separation makes a ‘stronger contribution’ for i). Settlement Identity; ii). Physical and Visual Separation; and iii). Urbanising Influences; which is summarised in the following:

Settlement Identity

179. Under the heading of Settlement Identity, the Council states the following (N.B. Underlining added for emphasis):

‘Clifton upon Dunsmore is a historic village in a countryside setting. It has a conservation area, whose character has been well maintained, primarily stretching east to west along Main Street. It includes five Grade II listed buildings, one Grade II listed building (Church of St Mary), and numerous other non-designated buildings of historic importance. Outside of the conservation area there are several more modern sections of the village, including the residential areas along North Road (to the north) and South Road (to the south) which were mostly built-out in the mid-20th century, and the area comprising Hadfield Close and Son Close to the northeast which was constructed on part of the grounds of Clifton Manor in the*

1980s. As a result of this modern development, there only remains limited inter-visibility between the Conservation Area and the open countryside that lays within the assessment area, namely views from South Road looking South beyond the recreation ground, and glimpses of countryside looking down Rugby Road and Station Road.

Between the town and the village along Rugby Road there is ribbon development, much of which was initially constructed in the inter-war period. The only breaks in this ribbon between the two settlements are the bridge crossing the Oxford Canal, and the bridge that crosses a disused railway cutting between Vicarage Hill and Rugby Road.

180. Given the foregoing, Richborough note the following relative to the Council Methodology criteria for ‘Settlement Identity’:

‘It is an important part of a settlement’s setting’

181. The village is set with open, agricultural land stretching around the settlement from the southeast to northwest within the proposed Area of Separation. Richborough judges that the open agricultural land predominates across the proposed Area of Separation running southeast to northwest.

‘It features prominently in the views to and from the settlement’

182. Views of the open countryside setting is limited from within the Conservation Area, which is largely situated within the linear part of the village. Views across the Recreation Ground between the village and open countryside to the south are noted. Richborough judges there are limited opportunities to see outwards from the Conservation Area, which itself is predominantly enclosed by an outer edge of modern day/20th century-built form.

‘It provides a clear sense of arrival to or departure from the settlement’

183. There is ribbon development of built form along Rugby Road almost physically linking the village with Rugby in the southwestern periphery of the proposed Area of Separation, whereby the bridge crossing the Oxford Canal providing fleeting relief between the two settlements. At this location there is a very limited

experience of passing from one settlement to the other i.e. Rugby to Clifton upon Dunsmore. Richborough notes that the Council highlight no specific routes or approach points that are important in this regard within their examination.

‘It contributes positively to a conservation area’

184. Limited opportunity to see the open countryside setting from within the Conservation Area due to the extent of modern-day development which has transpired in the later 20th century. Richborough judges there are limited opportunities to see outwards from the Conservation Area, which itself is predominantly enclosed by an outer edge of modern day/20th century-built form.

Physical and Visual Separation

185. From the observations of the whole area, the Council states the following (N.B. Underlining added by Richborough for emphasis):

‘The gap between Rugby and Clifton upon Dunsmore varies in length. There is around 1km between the south of the village and the north of the town (the railway); around 700m between the west of the village and the east of the town (residential properties off Staveley Way); and around 600m between the southwest of the village and the Butlers Leap employment area of the town.

Rugby Road acts as the key connecting link between the two settlements, followed by Hillmorton Lane, and the combination of Newton Road and Newton Manor Lane. A pedestrian link is also provided by a public right of way (R114) that crosses from Station Road to the public open space on the eastern edge of Brownsover, however, as this is not paved, its accessibility is limited.

To the south of the village, the physical features that separate the two settlements include the railway, the Oxford Canal, the Houlton Way Road and mature trees along site boundaries. To the west and northwest of the village, the separating physical features include the River Avon, mature trees along site boundaries, and a disused railway line which lays on raised ground in some areas and is accompanied by mature trees along most of its length.

The topography of the assessment area is as follows. Most of the village and the fields directly to its south (including the recreation ground) are on a relatively high plateau (c. 115m) which then slopes away into a valley that reaches its lowest point along the Clifton Brook and the River Avon. The land then rises back up towards the town, although areas of development on the edge of the town, such as the properties of Staveley Way and to the north of Lower Hillmorton Road, are still lower than the village’.

186. Given the foregoing, Richborough notes the following relative to the Council Methodology criteria for ‘Physical and Visual Separation’:

It contributes to a broad gap between settlements

187. The gap of the proposed Area of Separation is defined predominantly by open agricultural land. With the western part of the area delineated by existing residential development, and the southern part with numerous man-made durable features along its edges, and within the southern part of the gap.
188. Richborough notes that broadness of this area is varied, and experienced as a border space to the south of the village whereby there are a number of robust physical features creating a layering effect along its southern edge.

It has a clear physical feature that marks the settlement edge

189. The settlement edge of Clifton upon Dunsmore is predominantly marked by the end of existing residential development. The village is not defined by a watercourse (river or brook), canal, railway line or main roadways passing to and from the wider urban conurbation.
190. These features, combined with employment buildings and land uses, as well as a golf course are found extensively to the southern periphery of the proposed Area of Separation and are away from the village edge of Clifton upon Dunsmore.

It does not contain direct vehicular links between settlements

191. The proposed Area of Separation is delineated by vehicular routes. Rugby Road runs through the Area, with Hillmorton Lane delineating the southeastern edge,

and Newton Road and Newton Manor Lane to the west-northwest. The southern part of the proposed Area contains Houlton Way, which runs parallel to the Oxford Canal. Both of these routes are set within the proposed Area of Separation.

Urbanising Influences

192. From the observations of the whole area, the Council states the following (N.B. Underlining added by Richborough for emphasis):

'The ribbon development along Rugby Road has a clear urbanising influence. This is strongest closer to Rugby where there is development on both sides of the road, including terraced houses that are not dissimilar to those found in parts of the town, and weaker to the north where there is farmland to the west and expansive views of the countryside that separates Clifton upon Dunsmore from Rugby.

Aside from the Houlton Way Road, the assessment area to the south of the village is composed exclusively of farmland, the golf course, and watercourses, and is therefore considered to be reasonably free of urbanising influences.

The area to the west and northwest of the village is primarily composed of open farmland and natural and semi-natural space. There are some pockets of development, including Clifton Wharf, farm buildings, and isolated dwellings, however these are all considered to accord with a rural setting, and are therefore not considered to have an urbanising influence'.

193. Given the foregoing, Richborough notes the following relative to the LPA Methodology criteria for 'Urbanising Influences':

'It lacks any development, or the development which exists is rural in character'

194. Predominantly within the proposed Area, land use is open, agricultural land. The exception to this is to the south whereby Rugby Golf Club is within the proposed Area, as well as the Oxford Canal and Houlton Way which pass through, beyond which is the golf course.

'It lacks infrastructure associated with human activity'

195. The western part of the proposed Area is predominantly rural and agricultural within the gap to Rugby (between the village and the urban area of Brownsover). The exception is the southern part of the proposed Area where there are a number of man-made , infrastructure and land uses including Rugby Golf Club is within the proposed Area, as well as the Oxford Canal and Houlton Way which pass through, beyond which is the golf course. The main railway line and neighbouring employment-built form defines the southern boundary. The southern part of the proposed Area is more extensively influenced by infrastructure and man-made features.

‘It has natural or semi-natural land uses, such as woodland or wetlands’

196. The Oxford Canal and Houlton Way roadway pass through the southern part of the proposed Area, with Rugby Golf Club situated both of these man-made land uses. The main railway line and neighbouring employment-built form defines the southern boundary. The southern part of the proposed Area is more extensively influenced by infrastructure and man-made features.

The current function of Site 335/248

197. The evidence base makes it clear that Rugby to the west of Clifton upon Dunsmore is not physically and perceptually connected with the village. However, to the southwest, the ‘ribbon development along Rugby Road has a clear urbanising influence. This is strongest closer to Rugby where there is development on both sides of the road, including terraced houses that are not dissimilar to those found in parts of the town’ creating coalescence at a point where the experience of passing between Rugby and Clifton upon Dunsmore is not obvious and overt.

198. The Area of Separation Study (November 2025) highlights the gap between Rugby and Clifton upon Dunsmore, the Council notes a number of Key Characteristics of the Settlement Gap, which are as follows:

- *‘The undeveloped river valley which lays between the west of the village and the east of the town, extensive views of which can be seen from Rugby Road and which acts to provide a sense of travelling through the countryside on the approach to Clifton upon Dunsmore.*

- *The undeveloped farmland which lays between the south of the village and the north of the town as seen from Hillmorton Lane and Houlton Way, which helps to retain the rural character of the settlement gap.*
 - *Mature tree cover on the edge of the town which limits views of Clifton upon Dunsmore from the residential area around Staveley Way.*
 - *The disused railway line and mature trees that accompany it to the west of the village, which act as a feature of physical separation’.*
199. However, the evidence base does not recognise the significance and frequency of the man-made features to the southern part of the proposed Area of Separation. The combination of the existing golf course, Oxford Canal, Houlton Way roadway, as well as the neighbouring employment-built form and land uses and the enclosure of the Area by the main railway are all durable features that perceptually segregate the Area into small pieces. Additionally, to this, to the south of the village, landform falls away create a natural physical feature that further defines the wider southern Area from that around the village.
200. Given the foregoing, Richborough judges that Site 335/248 is situated within a land parcel which neighbours the village but is segregated away from the wider gap between the village and the urban conurbation of the town to the southeast and southwest. This is not the case for the land within the gap to the west and northwest which is open countryside defined by the settlement edge in each direction between the village and the town.

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.

201. Policy EN4 should be deleted from the Plan.

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

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

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

202. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.