



Our Ref: P8107/SS/hr
 Date: 13th March 2026

Proposed Submission Consultation
 Development Strategy Team
 Rugby Borough Council
 Town Hall
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 Rugby
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Dear Sir/Madam

RE: Rugby Local Plan Review – Proposed Submission Consultation

Harris Lamb Planning Consultancy has been instructed by Taylor Wimpey (TW) to submit these representations in response to the Regulation 19 consultation being undertaken by Rugby Borough Council.

The first things we noticed when reviewing the Regulation 19 plan is that there have been a number of notable changes to the plan following the Regulation 18 consultation. In some locations there has been a complete change in approach, and it is difficult to reconcile such a large shift in direction. Below we set out our objections to one such change which impacts on TW’s land interest to the west of Dunchurch, part of which was previously proposed to be part of a larger housing allocation (ref. 341), but this allocation has now been remove and this site and the wider area now form part of a proposed Area of Separation.

Our Response to the Regulation 18 Plan

Dunchurch as a sustainable location to deliver housing

Through the Regulation 18 consultation we supported the identification of Dunchurch as a Main Rural Centre and a sustainable location to deliver housing and this remains the case.

Dunchurch has all the services and facilities to support additional housing and we identified that the South West Rugby SUE will link Dunchurch to Rugby, further enhancing its sustainable credentials.

Dunchurch remains outside of the Green Belt and TW consider it remains sustainable location to deliver additional homes.

Supported proposed housing allocation 341 with an proposed amendment

TW’s land interested covered the southern part of proposed allocation 341, although through our representations to the Regulation 18 consultation we identified that the proposed allocation would benefit significantly from the inclusion of the land to the south east, which is also controlled by TW. The additional land would link the allocation to Dunchurch, providing vehicular, cycle and/or pedestrian links into the village.

BIRMINGHAM
 0121 455 9455

STOKE-ON-TRENT
 01782 272555

NOTTINGHAM
 0115 947 6236

WORCESTER
 01905 22666



Whilst proposed allocation 341 has been removed from the plan, TW continue to support the allocation of the wider the site with the addition of the land connecting it to Dunchurch.

A proposed residential allocation for Dunchurch – Land off Sandford Way

In the Reg 19 plan, there are no allocations attributed to Dunchurch despite its status a Main Rural Centre. As an alternative to the allocation previously proposed, TW consider that a distinct residential allocation on its land interest would provide the best option for a residential allocation at Dunchurch.

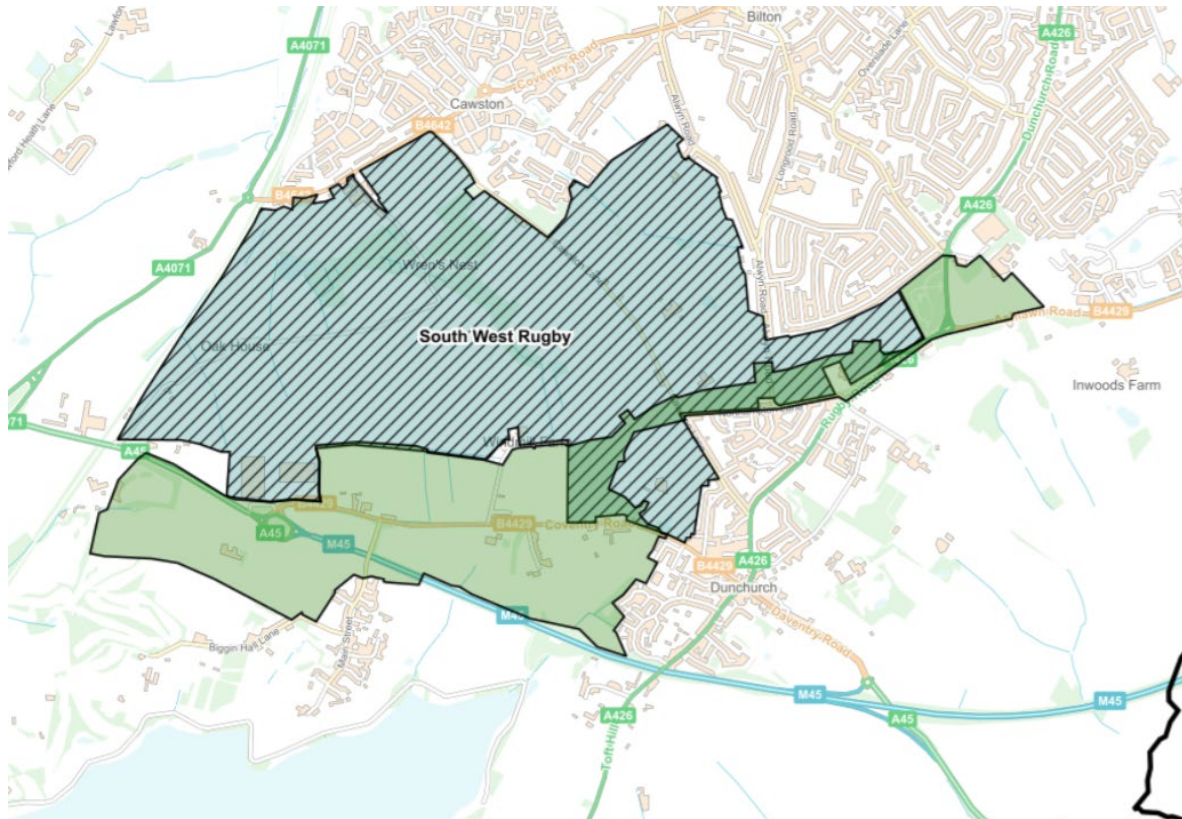
This site was given Site ID 41 in the Site Option Assessment and for ease of reference I attach TW's Call for Sites submission for this site. The attached masterplan shows this site and presents an indication for how it might come forward, although it should be noted that, at that time, the masterplan was prepared in the context of this site potentially coming forward as part of a wider residential allocation with the land with the grey wash to the northwest. Consequently, if TW's land came forward in isolation we would envisage a slightly different arrangement and a different treatment of the western edge of the site, with the inclusion of enhanced landscaping to soften the development edge.

As an allocation:

- This site could deliver around 107 to 122 dwellings with a net density of 35 and 40 dph respectively;
- It will be delivered in full within the first 5 years of the plan, delivering a policy compliant level of affordable housing. TW are a national housebuilder with strong local knowledge due to their involvement with the South West Rugby SUE and they are confident that there will be demand for this site;
- It would be located on the south west of the settlement and would not impact on the relationship between Dunchurch and the Rugby, which is located to the north of Dunchurch;
- The site is in Flood Zone 1 and there are no issues with surface water than could not be addressed through normal design measures associated with delivering a sustainable urban drainage system;
- There are no environmental designations on the site;
- Vehicle, pedestrian and cycle links can be provided through Sandford Way. TW's highway consultant has reviewed this and there is more than sufficient space to deliver a safe and efficient access solution. There are also no wider concerns about the potential of the wider highway network accommodating the vehicle flows from this site, subject to normal considerations; and
- It would be walkable to the services, facilities and public transport links provided by the village.

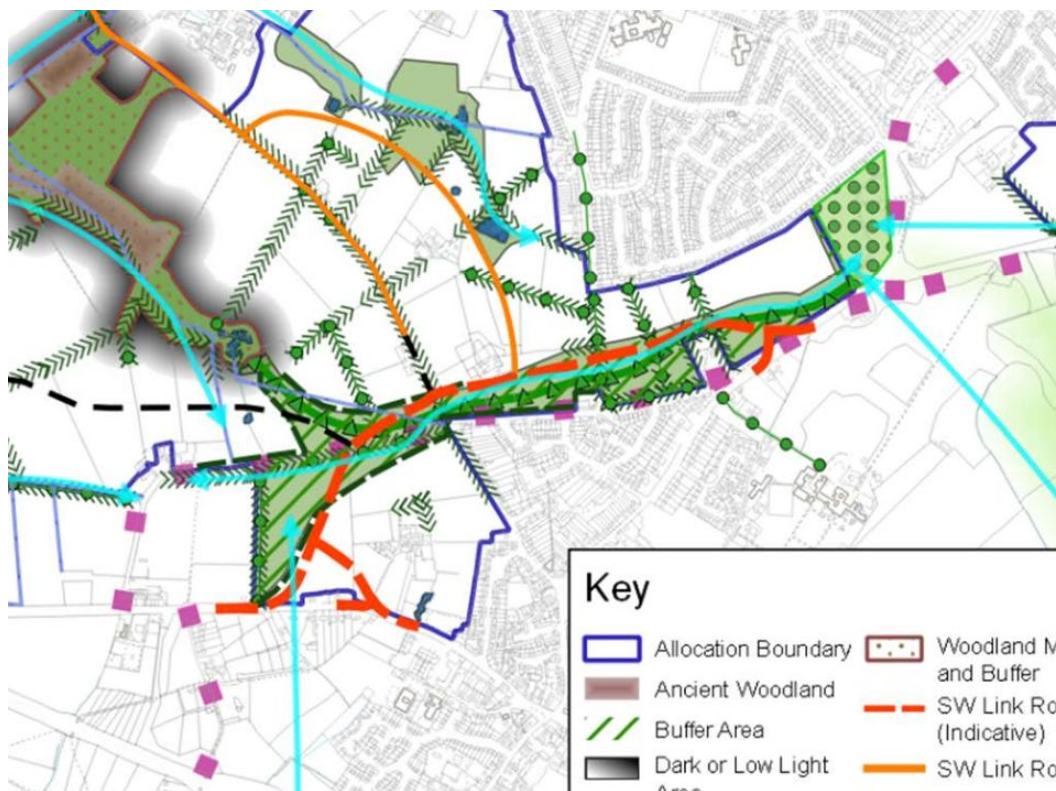
Objection to the Proposed Area of Separation

Our objection focuses on the proposed Area of Separation highlighted green in the plan extract below, which is proposed to maintain the separation between Rugby and Dunchurch and Thurlaston. The blue/turquoise wash with the diagonal lines is the South West Rugby SUE in the adopted plan which is proposed to be taken forward into the new plan.



There are four main things that stand out from the plan, none of which support the proposed Area of Separation:

1. The South West Rugby SUE directly adjoins and wraps around the entire northern and north western side of Dunchurch. There is no separation between them and the result will be the integration of Dunchurch into Rugby. This relationship has previously been supported through the local plan examination and TW are not stating that the South West Rugby SUE allocation should be altered, but TW cannot in this context understand the rationale for trying to maintain there is separation between the Rugby and Dunchurch when one adjoins the other. The built development within the SUE is proposed to directly adjoin the north west corner of Dunchurch. Whilst in the South West Rugby SPD (see extract below) identifies that the small slither of land proposed to be in the Area of Separation along the northern edge of Dunchurch consists of the SW Link Road (denoted by the red, dotted line) with grassed areas either side and a narrow 'Continuous Tree Corridor' (denoted by the green triangles). It is difficult to reconcile how this narrow strip with a road and a couple of lines of trees constitutes an Area of Separation when someone with a strong arm could throw an American football to their friend living on the side of the strip and the character of the land will be fundamentally altered.



2. The proposed Area of Separation goes through the South West Rugby SUE. We cannot recall having seen this before. Areas of Separation and large urban extensions have always been distinct designations for obvious reasons. In this case, the area is in the SUE because it is a functional part of the SUE, being the location of part of the development (proposed road) and part of the Green Infrastructure Strategy. This being different to an area being kept in its current agricultural state to maintain the character of the smaller settlement and provide a clear visually and physical break between the two.
3. The remainder of the Area of Separation to the west of Dunchurch does nothing to maintain the area of separation with Rugby, which is to the north. The closest part of Dunchurch to Rugby will always be the part of the South West Rugby SUE that directly adjoins it. It is not possible to come closer than this.
4. The B4429 and M45 provides a clear break between Thurlaston and Rugby, which negate the need for an Area of Separation. Thurlaston could and would remain a distinctly separate settlement even if development came further south in the future.

There are no policies or guidance on which to assess Areas of Separation, because they are not included in national policy or guidance. That said, Areas of Separation are included in local plans in other parts of the country and paragraph 4.8 of the Council’s Areas of Separation Study Report November 2025 seeks to set out some broad parameters gleaned from other local plan examinations for local designations. These include the following and we set out our comments against them in blue:

- Supporting evidence should take into account potential new boundary features that may alter the risk of settlement coalescence in future (e.g. major infrastructure);

The supporting evidence in this instance is the Area of Separation Study, but this does not fully consider the scale or nature of the South West Rugby SUE. What we mean by this is that it recognises the SUE is likely to “diminish” the gap with Dunchurch, but does not acknowledge the SUE will directly adjoin Dunchurch. Similarly, it identifies that the “strip

of undeveloped farmland and woodland to the north of Dunchurch, which acts to provide some limited sense of separation between the two settlements when travelling between them”, but does not acknowledge that the character of the strip proposed in the Area of Separation will be fundamentally altered with the provision of a road, tree belt and grass land associated with the SUE development. These are important omissions and change the assessment of the relationship between Rugby and Dunchurch.

- Designations to prevent settlement coalescence should only include land that plays a role in maintaining settlement separation rather than other purposes such as protecting the setting of historic environment assets;

TW consider that most of the land proposed in the Area of Separation plays little or no role in preventing coalescence between Rugby and Dunchurch. Indeed, this is difficult when the two are already proposed to coalesce at part of the committed SUE development. This is particularly true for TW’s land interest which is located on the south-western side of the settlement.

The Area of Separation study states the following in relation to the land to the west of Dunchurch:

“The development of the sites in the area immediately to the west of Dunchurch (41, 42, 90, 97, 285) would diminish the degree of physical separation between the western boundary of the village and the southern boundary of the town (inclusive of South West Rugby). Although there is already some limited ribbon development in this area (along Coventry Road) which is strongly associated with the village, this is currently interspersed between open land which contributes to the rural setting of the village and a sense of arrival and departure when travelling between Dunchurch and Symmetry Park (which shall form part of Rugby once South West Rugby is built out). In isolation, the impact of the development of the smaller sites (42, 90, 285) would likely be lower than that of the larger sites (41 and 97).”

This simply is not the case. For example, TW’s site is approximately 1.2 km from Symmetry Park at its closed point and there is not intervisibility. Similarly, it could be developed and not change the experience of road users on the Coventry Road. Other parcels are equally as far away from Symmetry Park and there is intervening development as identified in the extract above which would notably limit the perception of any change in separation between the settlements. Consequently, we do not consider that an Area of Separation is needed or justified between Rugby and Dunchurch.

- Local designations that preclude certain types or scales of development must be based on evidence, such as a landscape sensitivity study;

For the reasons stated above TW do not consider that the evidence supports the proposed designation, particularly in relation to separation between Rugby and Dunchurch.

- Local designations should be focused on protecting specific areas or features – not all rural areas outside settlement boundaries.

The proposed designation does not relate to all areas outside of the settlement boundary, but this does not mean that the designation is needed or that the designation is justified.

In summary, TW does not consider that the proposed Area of Separation is necessary or justified. Rugby is already proposed to coalesce with Dunchurch, and developing the parcels to the west would not change this and any potential impact would likely be negated by the pockets of development that already exist on Coventry Road and would enclose the proposed developments. The Area of Separation should either be removed or significantly reduced in size to focus on the relationship between Rugby and Thurlaston (albeit we have our reservations about the need for this as well).

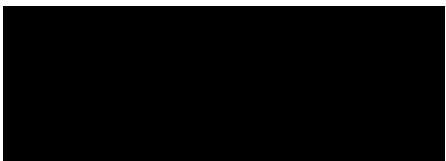
Policy EN4 - Areas of Separation

Taking the merits for the proposed Areas of Separation to one side, TW support the inclusion of section B and C within Policy EN4. It is important that in these locations that local designations such as this do not prohibit development which is not otherwise harmful to purpose of the designation (i.e. keeping the settlements separate). However, there are two amendments that we consider are necessary for this policy to be found sound:

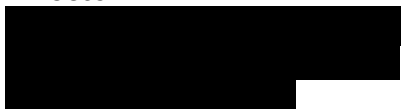
1. Under Section B – the reference to other “existing developments” should be deleted. The Areas of Separation have been proposed with these developments in place and so the focus going forward should be on the impact of the change in the area, not an established feature which already contributed to the character of the area when the designation was made, and
2. Under Section C – the reference to having “an urbanising influence” should be deleted. This does not relate to the designation, which is proposed to keep settlements separate. For example, I have worked on developments in Areas of Separation that were on the edge of a settlement and would have had an urbanising effect, but did not diminish the physical or visual separation, thereby not undermining the purpose of the designation.

We hope that you find these comments useful and constructive. Should you wish to discuss any of the matters raised and / or need anything further from us to assess the potential allocation of TW’s land please do not hesitate to contact me.

Yours sincerely



Sam Silcocks BSc (Hons) MA MRTPI
Director



Encs:

Appendix 1 : Masterplan
Appendix 2 : Call for Sites Submission


**APPENDIX 1:
LAND OFF SANDFORD WAY - MASTERPLAN**

Accommodation Schedule

Site Area: 6.14 hectares
 Undeveloped Land: 3.08 hectares
 Net Developable: 3.06 hectares
 Number of Homes: 122 homes
 Net Density: 40 homes/ha
 Gross Density: 20 homes/ha

Key

-  Site Boundary
-  Existing Trees
-  Proposed Trees (Indicative)
-  Existing Hedgerows
-  Green Infrastructure
-  Built Frontage
-  Rear/Front Gardens
-  Square/Raised Table/Focal Space
-  Primary Street
-  Secondary Street
-  Shared Surface Street
-  Shared Private Drives
-  Existing Access Road
-  Footpath
-  Existing Public Right of Way
-  Vehicle Gateway (Primary Access)
-  Pedestrian Gateway
-  Potential Secondary Access

 n*ORTH

0m 20m 40m 60m 80m 100m

Scale 1:2500 (@A2)

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e*SCAPE
 urbanists

Project Title
 Land at Sandford Way, Dunchurch

e*SCAPE Job No.
 023-028

Client
 Taylor Wimpey Strategic Land

Drawing Number Revision
 023-028-003 REV A

Drawing Title
 Illustrative Masterplan

Scale Date
 1:2500 @ A2 Jan '24



**APPENDIX 2:
LAND OFF SANDFORD WAY – CALL FOR SITES SUBMISSION**

Call for Sites Proforma – Land to the West of Sandford Way

Housing and Economic Land Availability Assessment (HELAA)

Call for Sites Proforma

- Please complete this form if you would like to suggest proposals for future land use and development within Rugby Borough on sites capable of delivering 5 or more homes, or sites larger than 0.25ha.
- The sites will be assessed as part of the HELAA and used as an evidence base document for the Local Plan preparation process.
- Please complete a separate form for each site. Complete each section clearly and legibly to the best of your knowledge. If you require more space, please use Section 9, or append additional pages.
- You must attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site and details of site ownership.

Data Protection Disclaimer

Details submitted to the council as part of a call for sites will help inform the HELAA and assist in identifying land for development to contribute to a land supply to meet local need. The submitted information will not be confidential as it will be published as part of a comprehensive land assessment via published reports available for public consumption. This information will also be shared with other parties, including employees of the council, other council departments and third parties, such as the Planning Inspectorate and other Local Planning Authorities.

Details provided in Section 1 will be kept and stored confidentially by the Council. Details in Section 2, the names of which should match those provided in Section 1, will be made publicly available as established above. As such, only names of organisations/agents/applications will be made public where it has been clearly declared through this submission form. No other details, such as addresses or contact information, will be made available.

By submitting this form to the Council, you are providing consent for us to retain your details on our Planning Policy as part of the Call for Sites process, the HELAA and to enter your details to our consultation database so that we may contact you in future to advise on the Local Plan preparation process.

1. Your Confidentially Held Details

Title	Sam	Name	Silcocks	
Organisation (if relevant)	Harris Lamb		Representing	Taylor Wimpey UK Limited
Address	[REDACTED]			
Postcode	[REDACTED]	Telephone	[REDACTED]	
Email	[REDACTED]			
Signature	[REDACTED]			
Date	[REDACTED]			

2. Your Publicly Viewable Details	
Name/Organisation	Harris Lamb
Status in relation to site	Planning Consultant
Representing (if applicable)	Taylor Wimpey UK Limited

3. Site Location			
Site Name	Land to the West of Sandford Way		
Site address (inc. postcode if known)	Land to the West of Sandford Way, Dunchurch		
OS Grid Easting	447838	OS Grid Northing	271072
Total Site Area	6.14 hectares	Developable Area	3.06
<p>Please attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site. The area of the site you wish to be formally assessed should be enclosed by a red line. Any other relevant land under your ownership should be enclosed by a blue line</p>			

4. Site ownership (please mark as appropriate and/or provide details)				
Do you own the site?	Yes – sole owner			
Is the site available?	Yes – immediately			
Have you notified the landowner/other landowners that you have submitted the site?			N/A	
Other relevant information e.g. is there a promotion / option agreement, is a developer on board etc.			The Site is owned by Taylor Wimpey	

5. Site Constraints (on site or at boundary – please mark as appropriate and/or provide details)	
Current/previous use	Pastoral Field
Adjacent land uses	
Planning History	None

Existing Infrastructure	All can be provided through the existing residential streets to the east			
Access from Highway	Yes – Classified Road			
Highway Works	New access onto Sandford Way			
Ransom Strips/ third party land required etc.	No			
Legal Issues	No			
Existing Occupiers	Agricultural tenant with rolling 2 month tenancy			
Public Access/Rights of Way	National Cycle Route 41 runs along, but outside the western boundary of the site, which links to Draycote Water to the south and Rugby to the north.			
Ecology/Wildlife Designations and other known issues				No
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	Along existing field boundaries	Retained and enhanced where possible		
Land Contamination /	No known contamination	Phase 2 Ground Investigations will be undertaken		
Heritage				No

Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)			
Flooding			
Other Physical Constraints (flooding, topography)			No
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc)			No
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)			No
Other Knowns Issues/Constraints			

6. Site Accessibility (please provide distance as measured from the middle of the site “as the crow flies” and utilise journey planner to determine walking time)			
Distance to closest bus stop (m/km)	320m	Walking time to closest bus stop (mins)	
Distance to closest amenities (m/km)	590m	Walking time to closest amenities (mins)	
Distance to closest rail station (m/km)	Rugby 6.7km	Walking time to closest rail station (mins)	
Any known issues with public transport – frequency of services etc	No, frequent service to Rugby and Leamington	Any known issues with amenities e.g. limited capacity at schools, GPs etc	None known
Other			

accessibility issues relevant to the nature of the proposal			
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7. Previous site promotional work (please cross reference with Section 5 where relevant)

Has any work been undertaken to promote the site and/or to overcome constraints?		No
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If yes, please provide more details and copies of reports where available:

However, Taylor Wimpey would welcome the opportunity to work with the Council on any matters that they consider require further investigation at this time.

Have any viability appraisals been undertaken?		No
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If yes, please provide more details and provide copies of reports where available:

However, Taylor Wimpey have undertaken their own feasibility assessment and are confident that they can deliver this site should an allocation be forthcoming

Are there any specific or immediate intentions to start development?	Yes	No
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If yes, please provide more details (such as Pre-application discussions)

A planning application will be submitted on confirmation of a residential allocation.

8. Proposal Details (please mark as appropriate and/or provide details)

Description of Proposed Development	122 dwellings with associated infrastructure, open space and landscaping			
Proposed Land Use	Residential			
Site capacity/density (homes/floor space)	122 dwellings Gross Density: 20dph Net Density: 40dph	Details of mixed/other land uses		
Potential Development			In control of developer	
Development time scales	Short term (within 5 years)	Medium term (6-10 years)	Long term (11-15 years)	Beyond (16+ years)

Development Timescale/Phasing (incl. build-out rates)	One phase – 3 years from the adoption of the allocation (1 year planning; 2 year build out)			

9. Additional information e.g. relevant evidence, other constraints and challenges, market desirability, planned infrastructure, opportunities etc				
<p>The site is owned by a national housebuilder who are confident the site will sell well.</p> <p>This is a non – Green Belt site and offers something different to the large Sustainable Urban Extensions to Rugby</p> <p>Dunchurch is well served by existing services and facilities, which will be enhanced by South West Rugby.</p>				

10. If the site fits the criteria for a brownfield site are you happy for us to include it on the relevant LPA brownfield land register (tick as appropriate)				
N/A				