

# Regulation 19 Representation

**Rugby Borough Council Local Plan 2025–2042**

**Long Lawford Allocation (650 Dwellings)**

Prepared by Professor Rebecca Walker BAHons DipArch RIBA

## **Introduction**

This representation is submitted in response to the **Regulation 19 consultation** on the **Rugby Borough Local Plan 2025–2042**.

It objects to the proposed allocation of land at Long Lawford, including Site ID 316 and 253, on the grounds that the plan is **unsound and legally non-compliant**.

Under **Section 20 of the Planning and Compulsory Purchase Act 2004**, a Local Plan may only be found sound if it satisfies the tests set out in **paragraph 35 of the National Planning Policy Framework (NPPF, December 2024)**.

These require that the plan is:

- **Positively prepared** – providing a strategy which seeks to meet objectively assessed needs.
- **Justified** – based on proportionate evidence and the most appropriate strategy when considered against reasonable alternatives.
- **Effective** – deliverable over the plan period and based on effective joint working.
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the NPPF.

It is submitted that the proposed Long Lawford allocation fails these tests for the reasons set out below.

## **Summary of Objection**

This representation objects to the proposed allocation of land at Long Lawford within the Rugby Borough Local Plan 2025–2042 on the following grounds:

- Failure to meet the Tests of Soundness (NPPF Para 35)
- Failure to comply with the **Town and Country Planning (Local Planning) (England) Regulations 2012**, particularly in relation to **transparent and meaningful** public consultation regarding Site ID 253.
- Non-compliance with **National Planning Policy Framework (NPPF) paragraphs 142–160**, which emphasise the protection of Green Belt land.
- Failure to satisfy **NPPF paragraph 143(a) and (c)**: proposed allocations constitute urban sprawl and lead to the merging of settlements.
- Failure to satisfy **NPPF paragraphs 143(e), 145 and 147**, as exceptional circumstances for releasing Green Belt land have not been adequately demonstrated, particularly given the lack of maximisation of brownfield land.
- Failure to consider the importance of Green Belt land in the mitigation of Climate Change.

## Argument 1

### Unsound, Misleading and Procedurally Flawed Local Plan

#### Lack of Transparent Public Consultation Regarding Site ID 253

The plan-making process must comply with the requirements of the **Town and Country Planning (Local Planning) (England) Regulations 2012**, particularly with respect to transparent consultation and public engagement.

The **Rugby Borough Local Plan Preferred Option Consultation Document (March 2025)** stated that **Site ID 316**, located within the Green Belt at Long Lawford (19.75 hectares), would accommodate approximately **400 dwellings**.

Similarly, the **Rugby Borough Council Local Plan Consultation Statement (December 2025)** also refers exclusively to Site 316, confirming on page 71 that “*Site 316 will be taken to the Regulation 19 Plan.*”

However, the **Regulation 19 Local Plan 2025–2042 (January 2026)** introduces an additional site allocation (Site ID 253) comprising 21.6 hectares of additional Green Belt land. This site was not included in the earlier consultation documents and was introduced at a late stage in the plan-making process. As a consequence, the majority of the public were unaware that this additional site had been proposed.

Whilst we are aware that a site can be added at the Regulation 19 Stage, even if it wasn’t in the Regulation 18 draft, we question if it should be **considered transparent or procedurally sound**. The site may have been in the background, but was not clearly documented for housing.

The Regulation 18 stage is intended to allow stakeholders and the public to engage with the council’s emerging spatial strategy and potential site allocations. The omission of this site from the Regulation 18 consultation meant that interested parties had no opportunity to comment on its suitability at the formative stage of plan preparation.

The appearance of the site for the first time as a proposed allocation at Regulation 19 significantly limits meaningful public engagement because this stage is primarily intended for representations on the plan’s legal compliance and soundness rather than for exploring new strategic options.

Introducing a new Green Belt allocation at this late stage undermines the principle of transparent and iterative plan-making and raises significant concerns regarding:

- procedural fairness
- transparency in plan-making
- compliance with the consultation requirements of the 2012 Regulations.

This procedural issue alone calls into question the **compliance of the plan**.

Site ID 253 is described as accommodating approximately **250 dwellings**. However, this figure does not correspond with the Council's own residential density methodology. Based on the Council's stated **rural edge-of-settlement density assumption of 35 dwellings per net developable hectare**, the site could potentially accommodate **700–750 dwellings**.

The use of a significantly lower indicative dwelling number risks misleading the public regarding the true development potential of the site. While the Local Plan may reference an indicative low-density scheme, it is reasonable to expect that future planning applications may seek significantly higher densities.

The introduction of this additional allocation therefore represents a **substantial and inadequately consulted encroachment into the Green Belt**.

## Argument 2

### The Plan is Not Consistent with National Planning Policy: Harm to the Green Belt and Failure to Justify Exceptional Circumstances

#### Green Belt Protection

The Government attaches **great importance to Green Belt protection**.

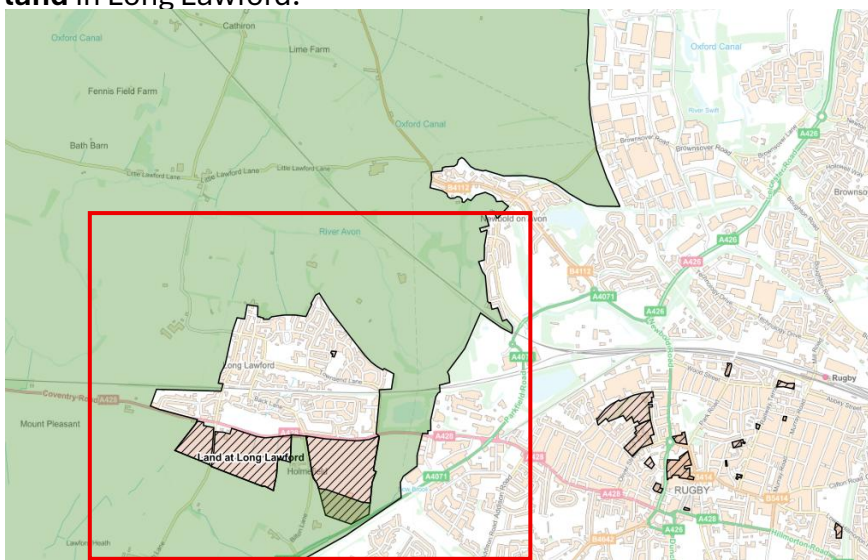
This is explicitly stated in **NPPF paragraph 142**, which confirms that the fundamental aim of Green Belt policy is to **prevent urban sprawl by keeping land permanently open**.

The essential characteristics of Green Belt land are **openness and permanence**.

The **National Planning Policy Framework (NPPF paragraph 143)** identifies five key purposes of the Green Belt:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Local Plan proposes the **removal of approximately 41.35 hectares of Green Belt land** in Long Lawford.



*Extract of Local Plan showing Long Lawford*

When viewed within the wider spatial context of Rugby, this allocation directly conflicts with the purposes set out in **NPPF paragraph 143**, particularly:

- **143(a)** – checking unrestricted sprawl
- **143(b)** – preventing the merging of settlements
- **143(c)** – safeguarding the countryside.

The ‘call for sites’ of which site ID253 forms part of is as shown below:



*Extract of Call for Sites plan*

The Council has indicated that a narrow strip of Green Belt will remain between Long Lawford and Rugby. However, such a residual strip offers **limited long-term protection** and could easily be removed through future plan reviews.

The scale of development proposed would represent the **functional merging of Long Lawford with the urban areas of New Bilton and Bilton**, fundamentally altering the character of the settlement.

Contrary to the NPPF (Para 143) the proposals therefore represent the very definition of **urban sprawl**, as they involve the rapid conversion of agricultural land into urban development that:

- expands the built-up area of Rugby westwards
- erodes the distinct identity of Long Lawford as a village
- encroaches significantly into open countryside

Below is the current view of the open ness of the Green Belt, which is actively used for farming. This site rises up a hill, which will further intensity the mass of urban sprawl and shows clear encroachment into the countryside.



Site 316

Below is a photos of site 253 which also rise up a hill. The impact on the countryside will be extremely intrusive.



Site 253

The proposed development in Long Lawford, will almost double the size of the village.

The Local Plan itself states (Policy S1A paragraph 1.15) that the settlement hierarchy seeks to direct development to locations with appropriate services and facilities.

The **National Planning Policy Framework (December 2024)** also emphasises that sustainable development should minimise reliance on private car travel and ensure that communities have access to essential services and facilities.

Long Lawford currently has a population of approximately **4,500 residents** and contains only limited services:

- one village shop
- one public house
- a playing field
- a small community centre and church
- one primary school with capacity for approximately **630 pupils**

The village lacks several essential services required to support a significant expansion in population:

#### **Healthcare provision**

There are no doctors' surgeries, dental practices, or pharmacies within the village.

#### **Education capacity**

There is only one primary school in the village. Without substantial expansion, it is unlikely that this facility could accommodate the additional demand generated by **650+ new dwellings**. There is also no early years provision.

#### **Transport and highway constraints**

Long Lawford is a linear settlement served primarily by a **single spine road connecting to Rugby town centre**. Existing congestion is already significant. During peak hours, the journey of approximately **2.4 miles to Rugby town centre can take up to 50 minutes**.

This indicates that the current road network is already under pressure and may not be capable of accommodating the scale of additional traffic generated by the proposed development.

While public transport connections to Rugby town centre exist, the planning balance should also consider the **availability of services within the settlement itself**. Many residents, particularly elderly residents, rely on local facilities within walking distance.

A **50-minute walk to Rugby town centre** cannot reasonably be considered to be within convenient walking distance for meeting everyday needs.

Accordingly, Long Lawford does not represent a **sustainable location for development at this scale**, and the proposed allocation fails to satisfy the sustainability objectives of national planning policy.

The sites does not comply with the NPPF, and should not pass the 'Grey Belt' test as they do not sit within a functioning settlement to meet their day-to-day needs by foot.

## Argument 3

### Failure of the Plan to Meet the Tests of Soundness;

### Failure to Demonstrate Exceptional Circumstances – Lack of Brownfield Site Maximisation

Under **NPPF paragraph 147**, Green Belt boundaries should only be altered where **exceptional circumstances** are fully evidenced.

### The Plan is Not Justified (NPPF paragraph 35)

To be justified, a plan must represent **the most appropriate strategy when considered against reasonable alternatives**, based on proportionate evidence.

#### Lack of Evidence Regarding Brownfield Capacity

The NPPF requires local authorities to prioritise previously developed land.

- **NPPF paragraph 125** – planning policies should make effective use of land.
- **NPPF paragraph 129** – substantial weight should be given to the value of using suitable brownfield land.
- **NPPF paragraph 147(a)** – before altering Green Belt boundaries, authorities must demonstrate that they have **fully examined all other reasonable options**, including maximising brownfield land.

The NPPF states that before concluding that exceptional circumstances exist, local planning authorities must demonstrate that they have **fully examined all other reasonable options for meeting development needs**, including:

#### Maximising the use of suitable brownfield sites and underutilised land.

There is insufficient evidence that Rugby Borough Council has fully explored brownfield development opportunities within the urban area before proposing Green Belt release.

Several sites listed on the Council's **Brownfield Land Register** remain undeveloped:

*(Nb only sites within the town centre have been documented)*

#### **(Site 2) Former Herbert Gray Collage, Little Church Street, CV2 1AW (0.74ha)**

This site has stood vacant since 2012; Expired permission R18/1811 for 78 extra care housing units, plus a 52-bed care home (**78 dwellings** plus care home).

#### **(Site 3) Former Newton Vehicle Rentals, 117 Newbold Road, CV21 2NZ (0.59ha)**

Vacant ready to build site: R17/2113 and R19/0902 Lapsed planning for **98** apartments with a request to increase to 122 units (withdrawn by agent).

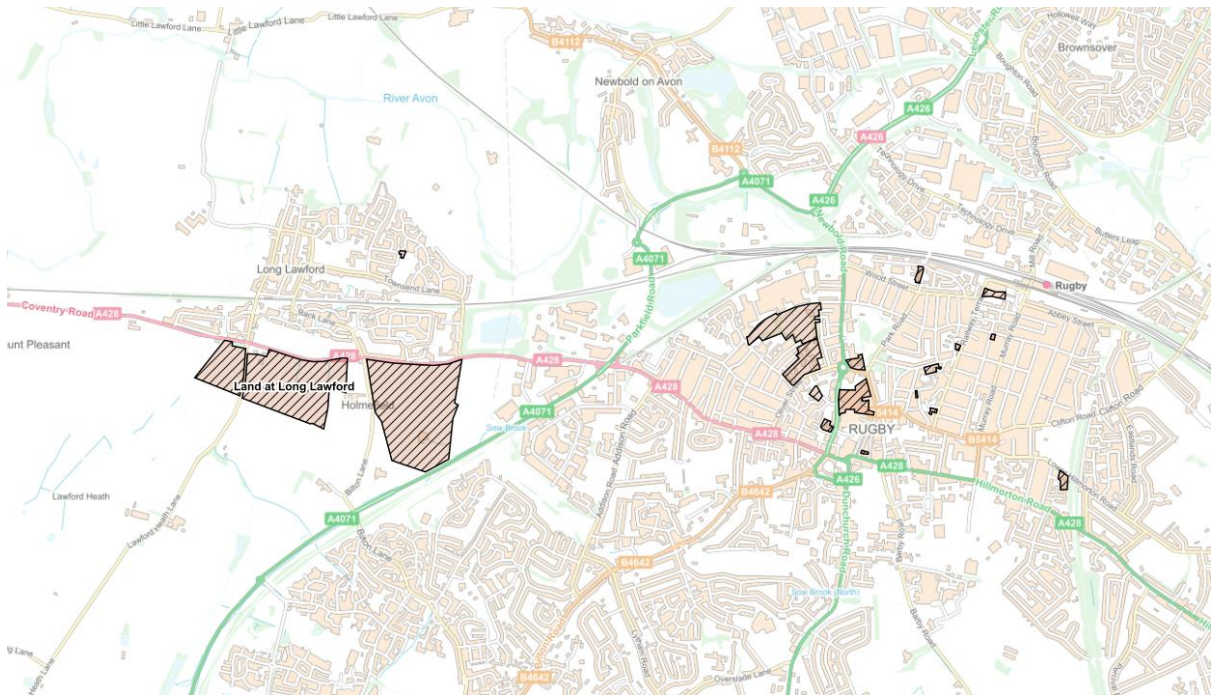
**(Site 4) 76, Buchanan Road, Rugby, CV22 6A (0.8ha)**

Expired permission for 8 apartments

**(Site 5) Brotherhood House, Gas Street, CV21 2TX (0.06ha)**

Expired permission for 9 dwellings

It is clear when comparing the proportion of housing on existing brown field sites in the town centre, to the declassification of the Green Belt in Long Lawford, the Council are proposing unnecessarily to bias their housing to Green Belt land.



*Extract of Local Plan showing Long Lawford compared to Rugby Town Centre*

**Additional Brownfield sites not documented in the Local Plan:**

**(Site 6) Cemex House, Evreux Way, Rugby CV21 2DT**

Cemex House, an existing 10 storey vacant office building, occupies a site of 0.65ha opposite the Town Hall. The site is in a prominent location and in the councils' own words "Cemex House is one of the first major buildings people see as they come into Rugby town centre and has been in a derelict site for far too long, so getting it back in use again is a key part of regenerating the town as a whole."

Planning permission has been granted for an Aldi supermarket on this site. There is an Asda supermarket less than 200 metres walk to the South. There are a number of other existing supermarkets and convenience store within walking distance.

Had this site been developed for housing, as an attractive exemplar of sustainable climate response architecture, if the Town Hall site at 0.52ha proposes 124 dwellings,

this larger site could contain **circa 150 new dwellings**, within a precedent of an existing 10 storey building. This would bring life and vitality to the town centre, in the most sustainable location.

**(Site 7) Land Adjacent to Topps Tiles, 65-67 Newbold Road, CV21 2ND**

0.045ha Vacant Site since pre 2018 with pre application advice sought (R18/1150)

4 houses or 8 flats could be built on this site (**8 dwellings**).

**(Site 8) Land to the South of 21 Boughton Road, Rugby, CV21 1BH**

Vacant site since pre-2020. Pre application advice sought for 8 no 2 bed houses and 8 no 3 bed houses (**16 dwellings**).

**(Site 9) 1 Pinders Lane, Rugby, CV21 2SW**

Pre application to be submitted by agent to convert this 0.35ha site to circa **5 dwellings**.

**(Site 10) Land to the South of Spring Street, Rugby**

R23/1115 Planning granted for 5 no dwellings and 4 no apartments. Why is this brownfield site not included in the Local Plan, as the owner was liaising with RBC Housing team (**9 dwellings**).

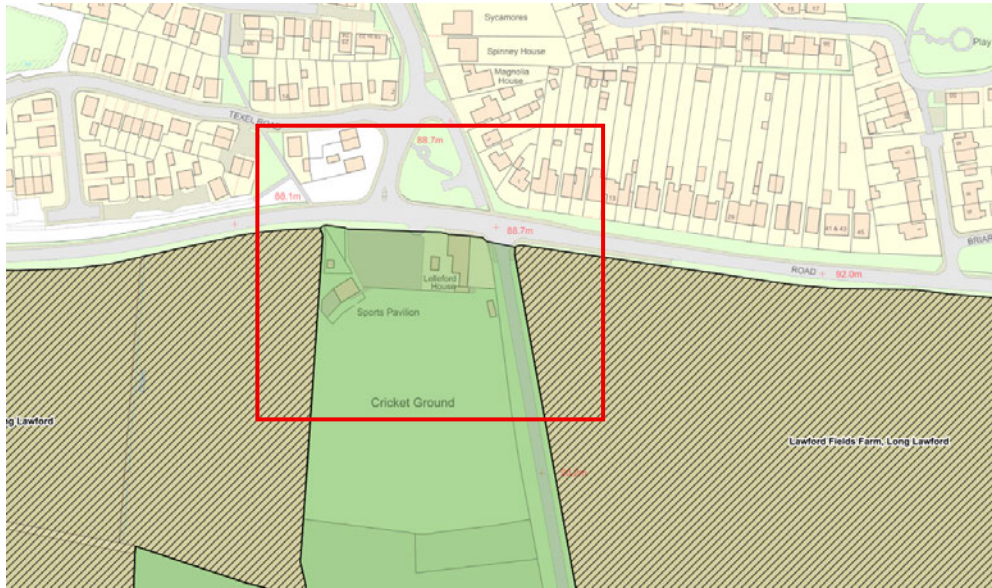
Taken together, these sites alone could provide **approximately 400 homes**, exceeding the proposed capacity of Site ID 253.

This clearly demonstrates that the Council has **not exhausted reasonable brownfield alternatives** before proposing the release of Green Belt land.

## Additional Brownfield Opportunity in Long Lawford

(Site 11) **Lelleford House, Long Lawford**, currently consists of a **tarmac car park**, which constitutes brownfield land (or potentially “grey belt”). However, it continues to be designated as Green Belt within the Local Plan. This site could reasonably accommodate approximately **5-7 dwellings**.

The failure to identify and integrate such sites further illustrates the **limitations and inconsistencies within the Local Plan evidence base**.



*Extract of plan showing Lelleford House, Long Lawford*

Below is a photograph of the clearly Grey Belt carpark, which is classified as Green Belt in the Local Plan, facing onto the Brambles housing estate, once also Green belt, a mass of red brick. This mass of urban form will run from the town centre and merge into the village should the 2 sites be allowed.



## **Failure to Proactively Deliver Housing**

**There are also concerns regarding the Council's ability to deliver housing on previously approved sites.**

For example:

### **Round Gardens (Sites 350)**

Planning permission was granted in 2019 for the demolition of tower blocks containing 189 flats, with a commitment to replace them with 221 new homes. Demolition was completed in 2022, yet the Local Plan now proposes only 70 homes on the site, 7 years after demolition. This much needed housing site has stood vacant for 7 years. We would also question why only 70 dwellings are now proposed? A multi storey option could house many more, in a vital sustainable location.

### **Site ID354: 92 Lower Hillmorton Road, Rugby**

A planning application for **34–40 dwellings** submitted in November 2022 remains undecided more than three years later.

### **Site (10) Land to the South of Spring Street, Rugby**

A planning application was submitted in December 2023 for the above site. Approval was not granted until April 2025, 1.5 years later.

These delays raise questions about the Council's ability to **proactively support and deliver development on sustainable brownfield sites.**

## Environmental Considerations

**NPPF paragraph 142** states that the Government attaches great importance to Green Belts, whose essential characteristics are **openness and permanence**.

Green Belt land also provides important environmental functions including:

- carbon capture and storage
- biodiversity support
- natural flood management

This 41.35ha of Green Belt, should be **considered with great importance** as stated in the NPPF.

Green belt land is vital natural infrastructure for tackling climate change. Existing green spaces in Green Belt are important for carbon capture and storage as well as supporting wildlife.

Promoting the redevelopment of brownfield land within the urban area aligns with recommendations from the **Intergovernmental Panel on Climate Change**, which emphasises the importance of **compact and efficient urban development**.

The Local Plan's reliance on Green Belt development rather than brownfield regeneration therefore appears inconsistent with sustainable planning principles.

Whilst the indicative master plan for site 253 states that it will contain open green spaces, as an architect and planner of 25 years I can foresee the developers will state in their planning application that it is not 'viable' to retain such green spaces and they will be removed. This is a common occurrence in planning applications.

## Flood Risk Concerns

While the Council's strategic reports indicate that the proposed sites are not subject to flooding, local experience suggests otherwise. As a resident living between the proposed sites for over twelve years, I can confirm that **significant flooding occurs annually across both locations**.

This local knowledge raises concerns regarding the adequacy of the Council's flood risk assessment. The report is strategic and bias.

## Affordable Housing Concerns

Under **NPPF paragraph 156**, developments involving Green Belt release should comply with the “**Golden Rules**”, including delivering **50% affordable housing** where applicable.

However, the nearby **Brambles development** (adjacent the site 316 planning reference R17/1089), which also involved the release of Green Belt land, was approved with only **15% affordable housing**, rather than the required **30%**.

The developer justified this reduction on viability grounds despite being a major national housebuilder with significant turnover. Subsequent applications have further amended affordable housing tenures.

This raises concerns regarding the **deliverability of policy-compliant affordable housing** on future Green Belt developments.

## Conclusion

For the reasons set out above, the proposed allocation of land at Long Lawford — particularly the late addition of **Site ID 253** — renders the Local Plan **unsound**.

The plan:

- fails to comply with statutory consultation requirements
- conflicts with key Green Belt protections within the NPPF
- promotes unsustainable development in a location with limited services
- does not adequately demonstrate exceptional circumstances
- fails to maximise available brownfield land

## Requested Action

Accordingly, the proposed **allocations (351 and 253)** should be **removed from the Local Plan**.

## Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

**Name of the Local Plan to which this representation relates:** Rugby Borough Council Proposed Submission Local Plan

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

This form has two parts –

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

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

### Part A

#### 1. Personal Details\*

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

#### 2. Agent's Details (if applicable)

Title	Mrs	
First Name	Rebecca	
Last Name	Walker	
Job Title	[REDACTED]	
(where relevant) Organisation	[REDACTED]	
(where relevant) Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
Line 4		
Post Code	[REDACTED]	
Telephone Number	[REDACTED]	

E-mail Address  
(where relevant)

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

Name or Organisation:

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

Local Plan Paragraph	S6	Local Plan Policy		Policies Map	
Site ID	253 316				

4. Do you consider the Local Plan:

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

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.

### **Regulation 19 Representation**

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- Non-compliance with **National Planning Policy Framework (NPPF) paragraphs 142–160**, which emphasise the protection of Green Belt land.
- Failure to satisfy **NPPF paragraph 143(a) and (c)**: proposed allocations constitute urban sprawl and lead to the merging of settlements.
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## **Argument 1**

### **Unsound, Misleading and Procedurally Flawed Local Plan**

#### **Lack of Transparent Public Consultation Regarding Site ID 253**

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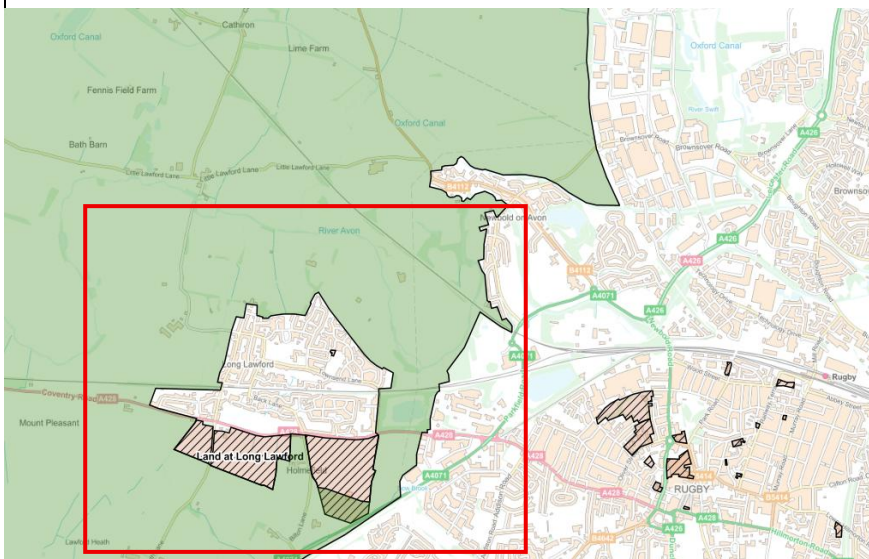
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*(Nb only sites within the town centre have been documented)*

#### **(Site 2) Former Herbert Gray Collage, Little Church Street, CV2 1AW (0.74ha)**

This site has stood vacant since 2012; Expired permission R18/1811 for 78 extra care housing units, plus a 52-bed care home (**78 dwellings** plus care home).

**(Site 3) Former Newton Vehicle Rentals, 117 Newbold Road, CV21 2NZ (0.59ha)**  
Vacant ready to build site: R17/2113 and R19/0902 Lapsed planning for 98 apartments with a request to increase to 122 units (withdrawn by agent).

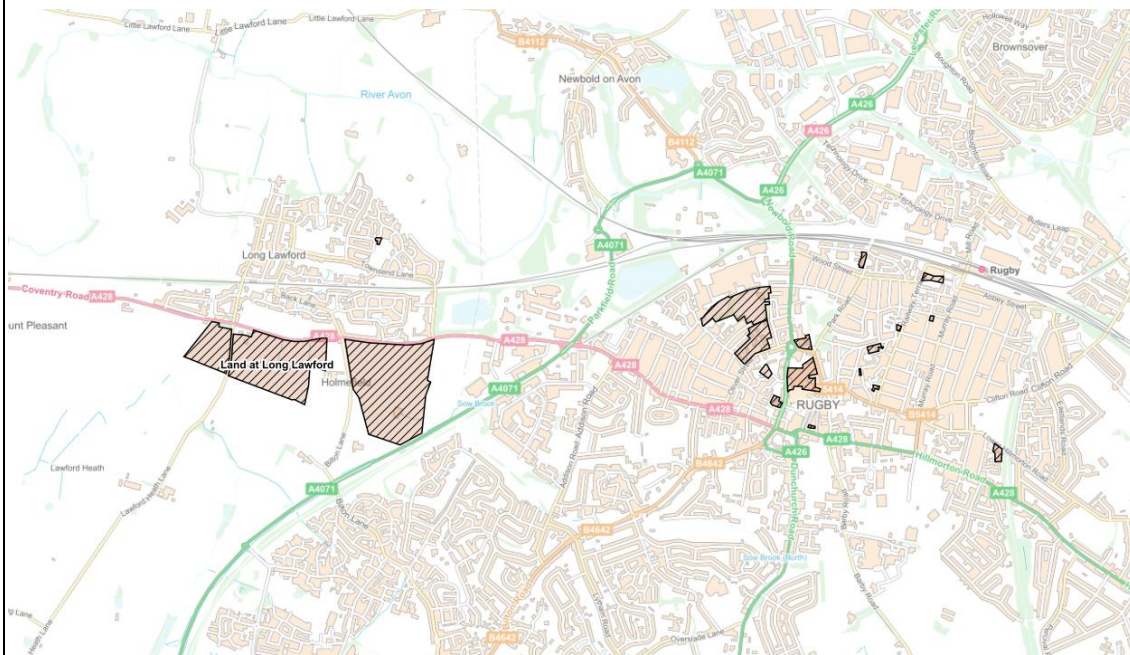
**(Site 4) 76, Buchanan Road, Rugby, CV22 6A (0.8ha)**

Expired permission for 8 apartments

**(Site 5) Brotherhood House, Gas Street, CV21 2TX (0.06ha)**

Expired permission for 9 dwellings

It is clear when comparing the proportion of housing on existing brown field sites in the town centre, to the declassification of the Green Belt in Long Lawford, the Council are proposing unnecessarily to bias their housing to Green Belt land.



*Extract of Local Plan showing Long Lawford compared to Rugby Town Centre*

**Additional** Brownfield sites not documented in the Local Plan:

**(Site 6) Cemex House, Evreux Way, Rugby CV21 2DT**

Cemex House, an existing 10 storey vacant office building, occupies a site of 0.65ha opposite the Town Hall. The site is in a prominent location and in the councils' own words "Cemex House is one of the first major buildings people see as they come into Rugby town centre and has been in a derelict site for far too long, so getting it back in use again is a key part of regenerating the town as a whole."

Planning permission has been granted for an Aldi supermarket on this site. There is an Asda supermarket less than 200 metres walk to the South. There are a number of other existing supermarkets and convenience store within walking distance.

Had this site been developed for housing, as an attractive exemplar of sustainable climate response architecture, if the Town Hall site at 0.52ha proposes 124 dwellings, this larger site could contain **circa 150 new dwellings**, within a precedent of an existing 10 storey building. This would bring life and vitality to the town centre, in the most sustainable location.

**(Site 7) Land Adjacent to Topps Tiles,65-67 Newbold Road, CV21 2ND**

0.045ha Vacant Site since pre 2018 with pre application advice sought (R18/1150)  
4 houses or 8 flats could be built on this site (**8 dwellings**).

**(Site 8) Land to the South of 21 Boughton Road, Rugby, CV21 1BH**

Vacant site since pre-2020. Pre application advice sought for 8 no 2 bed houses and 8 no 3 bed houses (**16 dwellings**).

**(Site 9) 1 Pinders Lane, Rugby, CV21 2SW**

Pre application to be submitted by agent to convert this 0.35ha site to circa **5 dwellings**.

**(Site 10) Land to the South of Spring Street, Rugby**

R23/1115 Planning granted for 5 no dwellings and 4 no apartments. Why is this brownfield site not included in the Local Plan, as the owner was liaising with RBC Housing team (**9 dwellings**).

Taken together, these sites alone could provide **approximately 400 homes**, exceeding the proposed capacity of Site ID 253.

This clearly demonstrates that the Council has **not exhausted reasonable brownfield alternatives** before proposing the release of Green Belt land.

## **Additional Brownfield Opportunity in Long Lawford**

**(Site 11) Lelleford House, Long Lawford**, currently consists of a **tarmac car park**, which constitutes brownfield land (or potentially “grey belt”). However, it continues to be designated as Green Belt within the Local Plan. This site could reasonably accommodate approximately **5-7 dwellings**.

The failure to identify and integrate such sites further illustrates the **limitations and inconsistencies within the Local Plan evidence base**.



*Extract of plan showing Lelleford House, Long Lawford*

Below is a photograph of the clearly Grey Belt carpark, which is classified as Green Belt in the Local Plan, facing onto the Brambles housing estate, once also Green belt, a mass of red brick. This mass of urban form will run from the town centre and merge into the village should the 2 sites be allowed.



## **Failure to Proactively Deliver Housing**

**There are also concerns regarding the Council's ability to deliver housing on previously approved sites.**

For example:

### **Round Gardens (Sites 350)**

Planning permission was granted in 2019 for the demolition of tower blocks containing 189 flats, with a commitment to replace them with 221 new homes. Demolition was completed in 2022, yet the Local Plan now proposes only 70 homes on the site, 7 years after demolition. This much needed housing site has stood vacant for 7 years. We would also question why only 70 dwellings are now proposed? A multi storey option could house many more, in a vital sustainable location.

### **Site ID354: 92 Lower Hillmorton Road, Rugby**

A planning application for **34–40 dwellings** submitted in November 2022 remains undecided more than three years later.

### **Site (10) Land to the South of Spring Street, Rugby**

A planning application was submitted in December 2023 for the above site. Approval was not granted until April 2025, 1.5 years later.

These delays raise questions about the Council's ability to **proactively support and deliver development on sustainable brownfield sites.**

## **Environmental Considerations**

**NPPF paragraph 142** states that the Government attaches great importance to Green Belts, whose essential characteristics are **openness and permanence**.

Green Belt land also provides important environmental functions including:

- carbon capture and storage
- biodiversity support
- natural flood management

This 41.35ha of Green Belt, should be **considered with great importance** as stated in the NPPF.

Green belt land is vital natural infrastructure for tackling climate change. Existing green spaces in Green Belt are important for carbon capture and storage as well as supporting wildlife.

Promoting the redevelopment of brownfield land within the urban area aligns with recommendations from the **Intergovernmental Panel on Climate Change**, which emphasises the importance of **compact and efficient urban development**.

The Local Plan's reliance on Green Belt development rather than brownfield regeneration therefore appears inconsistent with sustainable planning principles.

Whilst the indicative master plan for site 253 states that it will contain open green spaces, as an architect and planner of 25 years I can foresee the developers will state in their planning application that it is not 'viable' to retain such green spaces and they will be removed. This is a common occurrence in planning applications.

## **Flood Risk Concerns**

While the Council's strategic reports indicate that the proposed sites are not subject to flooding, local experience suggests otherwise. As a resident living between the proposed sites for over twelve years, I can confirm that **significant flooding occurs annually across both locations**.

This local knowledge raises concerns regarding the adequacy of the Council's flood risk assessment. The report is strategic and bias.

## **Affordable Housing Concerns**

Under **NPPF paragraph 156**, developments involving Green Belt release should comply with the "**Golden Rules**", including delivering **50% affordable housing** where applicable.

However, the nearby **Brambles development** (adjacent the site 316 planning reference R17/1089), which also involved the release of Green Belt land, was approved with only **15% affordable housing**, rather than the required **30%**.

The developer justified this reduction on viability grounds despite being a major national housebuilder with significant turnover. Subsequent applications have further amended affordable housing tenures.

This raises concerns regarding the **deliverability of policy-compliant affordable housing** on future Green Belt developments.

## Conclusion

For the reasons set out above, the proposed allocation of land at Long Lawford — particularly the late addition of **Site ID 253** — renders the Local Plan **unsound**.

The plan:

- fails to comply with statutory consultation requirements
- conflicts with key Green Belt protections within the NPPF
- promotes unsustainable development in a location with limited services
- does not adequately demonstrate exceptional circumstances
- fails to maximise available brownfield land

## Requested Action

Accordingly, the proposed **allocations (351 and 253)** should be **removed from the Local Plan**.

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.

Removal of site ID 253 and 316 from the Local Plan and retention of their Green Belt status.

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

