

This response to the Regulation 19 consultation on the Proposed Submission Local Plan for Rugby Borough contains the following parts below:

- Part A providing my details;
- Part B1 on the Unjustified Dispersed Spatial Strategy;
- Part B2 on the Failure to Reduce Greenhouse Gas Emissions;
- Part B3 on the Damaging Green Belt Impact;
- Part B4 on Site 348, The Croft, Stretton on Dunsmore;
- Part B5 on Site 81, land west of Fosse Way, Stretton on Dunsmore;
- Part B6 on Site 6, Land east of Fosse Way, Stretton on Dunsmore;
- Appendix describing a case study of a real-world development where the assertions in the proposed Plan are not realised in practice.

Each Part B includes detailed references to evidence used in this response.

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" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Alan"/>	<input type="text"/>
Last Name	<input type="text" value="Yates"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="██████████"/>	<input type="text"/>
Line 2	<input type="text" value="████████████████████"/>	<input type="text"/>
Line 3	<input type="text" value="██████"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="██████████"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text" value="████████████████████"/>	<input type="text"/>

Part B1 – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: Alan Yates

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

Local Plan Paragraph	1.5 - 1.7	Local Plan Policy	S1	Policies Map	
Site ID					

4. 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"/>

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.

Unjustified Dispersed Spatial Strategy

The proposed Local Plan persists with a dispersed spatial strategy despite serious objections and lack of robust evidence to support this strategy. This strategy “*diversifies the location and size of housing sites*” and asserts that¹ “*This will secure more affordable housing (delivery of which has historically been weak) due to higher house prices and stronger development viability in rural parts of the borough.*” The Plan fails to justify how higher house prices lead to more affordable housing. If the theory is that builders can make greater profits on ‘executive homes’ in the countryside to enable them to include so-called affordable housing, this theory has repeatedly failed in practice. The greatest need is for rented affordable housing rather than affordable home ownership² and these residents are those most likely to also depend on efficient local transport and easy access to schools and to work and to competitive shopping options. Houses to buy in the rural villages fail to meet these needs.

In particular, the Plan offers no justification in response to the serious objection to the strategy documented in the previous consultation response from Warwickshire County

¹ Paragraph 1.7 of Proposed Submission Local Plan dated January 2026

² Sustainability Appraisal paragraph 5.2.10

Council³. In response to the question about the dispersed spatial strategy for new homes, WCC's response was '**disagree**'. The reasons WCC gave for disagreeing with the proposed dispersed strategy include:

- It does not support active travel;
- It would lead to increased travel from villages to larger urban centres;
- It would lead to increased transportation of students to secondary education;
- It would lead to increased trips by car to places of employment, training and higher education;
- It would add further burdens to limited social and health care infrastructure in rural areas.

The SA claims to be informed by consultation responses but, despite earlier objections, it continues to allocate houses in many rural areas in **all** growth scenarios⁴. Despite the number of greenfield allocations being lower⁵ than in the earlier consultation and despite increasing the number of growth scenarios to 8, there has still been no reasonable analysis of alternatives to growth for these rural villages⁶:

- Binley Woods
- Brinklow
- Clifton on Dunsmore
- Ryton on Dunsmore
- Stretton on Dunsmore
- Wolston
- Wolvey

Allocations in these least sustainable of chosen 'growth' communities is held constant in all scenarios - it appears to be 'a given' with no adequate assessment of reasonable alternatives. This is not justified. The NPPF specifies⁷ that adverse impacts on environmental objectives should be avoided and that alternatives options with reduced impact should be pursued but the proposed development in rural villages fails to achieve this.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the

³ Warwickshire County Council's consultation response dated April 2025 at [Statutory consultees - Rugby Borough Council](#) and confirmed in Sustainability Appraisal paragraph 5.2.43

⁴ Sustainability Appraisal, paragraphs 9.13.1-9.13.2

⁵ Sustainability Appraisal paragraph 5.2.39

⁶ Sustainability Appraisal Tables 5.1 and 5.2 and paragraph 5.4.111

⁷ NPPF paragraph 33

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.

There are several issues in the proposed plan that are interlocked so they cannot be resolved satisfactorily by individual changes.

The dispersed strategy should be changed to a strategy that directs development to brownfield sites and the urban area. Development must be constrained by the carbon budget. The Green Belt should be protected. Allocations in rural villages should be removed.

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Part B2 – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: Alan Yates

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

Local Plan Paragraph	Objective number 3	Local Plan Policy	CL1, CL2, CL3, CL4	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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Failure to Reduce Greenhouse Gas Emissions

The Plan objectives include the necessity to “Reduce carbon emissions”. The NPPF requires radical reductions in carbon emissions. But the SA concludes⁸ that “*it is difficult to conclude that built environment decarbonisation has been a strong focus of spatial strategy / site selection.*”

The proposed policies related to climate change are:

- net-zero buildings (CL1);
- renewable energy and low carbon technologies (CL2);
- water supply, quality and efficiency (CL3);
- climate adaptation (CL4)

These are necessary but they are not sufficient to **reduce** carbon emissions. The proposed net-zero buildings policy addresses only new buildings in operation but NOT the carbon cost of their development. The carbon assessment is confined⁹ to “*whether the emerging Rugby Local Plan draft Policy CL1 can be demonstrated necessary*”, again considering only operational emissions, not whether it is **sufficient** to meet emission targets. No policies are proposed to offset the significant carbon cost of

⁸ Sustainability Appraisal paragraph 9.6.3

⁹ Introduction in Carbon Budget Assessment; Net Zero Carbon Policy Support V2, August 2025

building large numbers of houses and warehouses or the increased transport emissions caused by usage of the new buildings, especially those in relatively unsustainable locations. Without these additional measures, the objective to reduce carbon emissions will not be achieved. This makes the proposed Plan unsound.

The SA flags a moderate or uncertain negative effect on climate change mitigation on all growth scenarios¹⁰. It recognises¹¹ that transport emissions are significant and also that *“there is a need to direct growth in line with accessibility objectives, to locations where there is good potential to reach key destinations by active or public transport”* but it fails to follow through with assessment of the impacts of growth in the rural villages. This failure is particularly unjustified in light of the WCC objection to the dispersed spatial strategy as outlined in Part B1; the SA recognises the county’s objections to other growth sites but makes no attempt to assess alternatives to growth in rural villages. As the SA considers growth in villages as constant across all assessed growth scenarios, the results are unjustified.

The Carbon Budget Assessment concludes¹² that *“If that rollout of improvements [over and above national plans such as the decarbonisation of the electricity grid] to existing housing in Rugby does not occur, there will be no space for new homes available in the housing sector carbon budget”*. There is no evidence that a robust and fully funded plan is in place in Rugby to make room within the carbon budget in order to enable the building of the proposed new housing. The proposed Plan is not consistent with national policy and is not justified.

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The dispersed strategy should be changed to a strategy that directs development to brownfield sites and the urban area. Development must be constrained by the carbon budget. The Green Belt should be protected. Allocations in rural villages should be removed.

¹⁰ Sustainability Appraisal paragraph 6.2.23

¹¹ Sustainability Appraisal paragraphs 6.2.51 (with my added emphasis) and 6.2.16

¹² Discussion section in Carbon Budget Assessment; Net Zero Carbon Policy Support V2, August 2025 (with my added emphasis)

Continue on a separate sheet /expand box if necessary)

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Part B3 – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: Alan Yates

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text" value="Allocations in the Green Belt"/>
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" 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.

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Damaging Green Belt Impact

The chosen dispersed spatial strategy allocates Green Belt land for development. This would require Green Belt boundaries to be altered and that would require exceptional circumstances. The Summary of Green Belt Changes (December 2025) lists:

- 12 proposed residential sites
- 3 further sites associated with proposed residential sites
- 3 proposed employment sites
- 3 further sites associated with proposed employment sites.

There is no explanation of how so many sites - 21 - can really be exceptional; it appears to be usual, which is the opposite of exceptional according to the dictionary. The NPPF outlines¹³ instances which could be exceptional, such as when an authority CANNOT meet identified needs THROUGH ANY OTHER MEANS. In the proposed Plan, Rugby **prefers** the proposed dispersed strategy even though it could meet needs through reasonable alternatives.

These Green Belt sites amount to a total of over 386 hectares of land proposed to be removed from the Green Belt. The cumulative damage to the Green Belt between Coventry and Rugby would be immense. Removal of land from the Green Belt here is

¹³ Paragraph 146 in NPPF, December 2024

not exceptional in time either, because recent impact was caused by the previous (adopted) local plan¹⁴.

The claimed benefits of the proposed housing allocations in the Green Belt are:

- Affordable housing delivery;
- Village Sustainability;
- Diversifying and speeding up housing delivery.

Rugby has consistently failed to meet its targets on affordable housing, mainly because viability claims have repeatedly been accepted as more important than the need for affordable housing. There is evidence of this on greenfield sites, both large and small. Yet the council makes an heroic assertion¹⁵ that greenfield sites at villages are best able to deliver affordable housing. It further asserts that Green Belt villages have the highest values and **therefore** the ability to deliver higher proportions of affordable housing. There is no evidence to support the unproven causality asserted; even if there was, creating houses for sale in rural areas is not the right way to solve the problem of affordable housing (as described in Part B1 above). A real-world case study is outlined in the Appendix (attached) showing how:

- viability claims undermine affordability policies;
- small sites do not necessarily lead to either faster housing delivery or diversity of types of houses;
- the resulting development lacks contribution to village sustainability but harms the Green Belt.

Rugby makes many claims about the claimed sustainability benefits of development in Green Belt villages but fails to analyse the delivery of affordable houses within recent developments in rural villages. The sustainability claims are not supported by evidence. For example, one such claim¹⁶ is that it would “*ensure the sustainability of rural primary schools*”. Yet it proposes three Green Belt allocations in a village where demand is already greater than supply at the school¹⁷. The sustainability claims amount to no more than dogma, rather than policy supported by robust evidence. Another example: there is no evidence that expansion of the villages that are more remote from urban centres leads to improved rural bus services for these rural villages.

The claims on diversifying and speeding up housing delivery continue this pattern of assertions. There is no evidence proving the claim¹⁸ that diversifying sites will also diversify the types of houses built. The assertion that diversification of sites will lead to opportunities for small builders is not established in practice; sites in Green Belt villages released in the previous (adopted) plan are being developed by large housebuilders. Other sites allocated in Green Belt villages in the previous plan still don't have planning

¹⁴ Confirmed in paragraph 1.4 of the Green Belt Exceptional Circumstances Topic Paper, December 2025

¹⁵ Paragraphs 2.117- 2.118 of the Green Belt Exceptional Circumstances Topic Paper, December 2025

¹⁶ Paragraph 2.124.5 of the Green Belt Exceptional Circumstances Topic Paper, December 2025

¹⁷ Sustainability Appraisal paragraph 5.2.49

¹⁸ Paragraph 2.132 of the Green Belt Exceptional Circumstances Topic Paper, December 2025

permission, undermining the claim that diversification of sites allocated leads to quicker development.

The claim that all other reasonable options have been examined is false. Rugby Borough is adjacent to both Northamptonshire and Leicestershire but studying these areas has been dismissed¹⁹. Sites such as Magna Park and DIRFT are major employment sites with expansion ambitions. In earlier phases of the Rugby Plan development, DIRFT was described as "a major site near to the town" linked to growth in HMOs in Rugby. Daventry is listed as a town centre in the proposed Plan. These neighbouring areas, which are not in the Green Belt, cannot be dismissed just because they are outside of an artificially defined housing market area constrained to Coventry and Warwickshire.

There is one further example of the failure to meet the exceptional circumstances test. One Green Belt allocation is a site²⁰ of just three houses. This is less than 0.03% of the claimed housing requirement. It is spurious accuracy to claim that the numbers of all other allocations are so accurate that an extra 3 dwellings could not be accommodated by any other means anywhere else in Rugby: not within windfalls? Not within the urban area? Not within large sites? Not on brownfield land? The rationale²¹ given for allocating this Site 6 is **because** it is in the Green Belt: "*Green Belt location means that allocation is proposed despite small site size because site could not come forward as windfall. This does not therefore double count with small site windfall allowance.*" In other words, if the site was not within the Green Belt, it would not have been allocated but would have been within the windfall allowance. So it is proposed to be taken out of the Green Belt because it is within the Green Belt. This reasoning is perverse.

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

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The dispersed strategy should be changed to a strategy that directs development to brownfield sites and the urban area. Development must be constrained by the carbon

¹⁹ Paragraph 2.140 of the Green Belt Exceptional Circumstances Topic Paper, December 2025

²⁰ Proposed Site 6 examined in more detail in Part B6

²¹ Rugby Stage 2 Site Assessment: Reasoning for allocating Site 6

budget. The Green Belt should be protected. Allocations in rural villages should be removed.

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

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Part B4 – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: Alan Yates

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	348				

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"/>

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Site 348, The Croft, Stretton on Dunsmore

Like several of the so-called Main Rural Settlements, Stretton on Dunsmore has a shop, a GP surgery, a pub and a primary school and has a few buses a day but this does not make it sustainable to anything like the degree of the main urban area. Stretton has poor access by non-car modes and remains extremely car dependent. The SA confirms²² that access to Coventry and Rugby is a key consideration even though there is no requirement to provide for unmet need from Coventry. Stretton's proximity to the A45 does not make travel by car sustainable. In fact, village centre congestion, unsuitable minor roads and problematic junctions make Stretton unsuitable for more traffic.

As recognised in the SA,²³ demand exceeds capacity in Knightlow Primary school in Stretton throughout the plan period. Further expansion of the village without a committed and funded plan to expand the school is contrary to the claimed sustainability benefit.

The proposed site is in the Green Belt in Stretton on Dunsmore, outside the established village boundary. This proposed allocation has been introduced late in the Plan cycle

²² Sustainability Appraisal paragraphs 5.4.8 and 5.4.77

²³ Sustainability Appraisal paragraph 5.2.49

as an alternative to Site 134 previously promoted. Both of these sites are adjacent to the Squires Road allocation in the current (adopted) Plan (DS3.9). Taylor Wimpey described the development of Site 134 as “*a natural extension of the existing residential allocation.*” Site 348 could also join up to the Squires Road development to fill in a triangle of house building from Plott Lane to School Lane (with one exception, described below). Whereas significant proposals in the Preferred Options were detailed in vision documents, there appears to be little detail available on Site 348 - this means a deficit in the opportunity for public scrutiny of this late addition.

When considering the merits of the Squires Road development proposed, and now being built, in the current (adopted) plan, the inspector’s report assessed²⁴ that the proposed new boundary for that development would “*form an effective permanent boundary to the Green Belt at this point.*” If either of the sites now proposed is now allocated, it would show that the assessment was incorrect - the revised Green Belt boundary is neither effective nor permanent. The proposed sites would increase the incursion into the Green Belt and its boundary would be even less defensible.

This progressive erosion of the Green Belt is made even worse by the proposal²⁵ to remove from the Green Belt the exception mentioned above: the remaining green field in the triangle now proposed for new houses. There is no valid justification for removing a further 1.76 hectares from the Green Belt. If this is done, its existing use as the school playing field would be put at risk by inviting even more housing development; this would reduce the quality of the school as well as removing valuable green space in the village. There is no evidence to support the claim that removal of the playing field would “*produce logical and defensible Green Belt boundaries*”.

Following the proposed developments, there would be no physical feature available to define a clear and permanent boundary in order to prevent further encroachment on the countryside. This would not comply with the NPPF²⁶.

Development of Site 348 would mean loss of agricultural land, some of which is of historic value as it retains its ridge and furrow heritage.

The analysis of Site 348 is unsound. Sometimes it is claimed to be suitable for about 30 dwellings and at other times 70²⁷. It is wrongly claimed to be in Ryton on Dunsmore.

The stated rationale²⁸ for selecting Site 348 is “*Development at this location accessed from School Lane is thought to reduce traffic routing within the village compared to other sites at this settlement. On this basis, the site is a proposed allocation.*” This basis is wrong because access to the A45 is left turn only, meaning that traffic from the site towards Rugby would have to drive right through the centre of the village (down School Lane, through the village centre, along Brookside, along the Fosse Way). In places, this route is narrow without footpaths and the proposed development would

²⁴Paragraph 189 in Inspector’s Report on Rugby Borough Local Plan dated 27 March 2019

²⁵Summary of Green Belt Changes, December 2025, Residential Allocations and Figure 6

²⁶NPPF paragraph 149f)

²⁷Stage 2 Site Assessment and SA paragraph 5.4.78, for example

²⁸Stage 2 Site Assessment, December 2025

increase traffic through the village centre conservation area that is often congested by parked cars already.

The analysis of Site 348 is unsound and its allocation would harm both the village and the Green Belt.

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

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Part B5 – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: Alan Yates

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	81				

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.

Site 81, land west of Fosse Way, Stretton on Dunsmore

Like several of the so-called Main Rural Settlements, Stretton on Dunsmore has a shop, a GP surgery, a pub and a primary school and has a few buses a day but this does not make it sustainable to anything like the degree of the main urban area. Stretton has poor access by non-car modes and remains extremely car dependent. The SA confirms²⁹ that access to Coventry and Rugby is a key consideration even though there is no requirement to provide for unmet need from Coventry. Stretton's proximity to the A45 does not make travel by car sustainable. In fact, village centre congestion, unsuitable minor roads and problematic junctions make Stretton unsuitable for more traffic.

As recognised in the SA,³⁰ demand exceeds capacity in Knightlow Primary school in Stretton throughout the plan period. Further expansion of the village without a committed and funded plan to expand the school is contrary to the claimed sustainability benefit.

²⁹ Sustainability Appraisal paragraphs 5.4.8 and 5.4.77

³⁰ Sustainability Appraisal paragraph 5.2.49

Site 81 would be accessed from the Fosse Way (B4455) near the bend between Meadow Close and the roundabout connecting Brookside to the Fosse Way. In the past, the Highways Authority have stated that they would not support any new accesses to be created off the Fosse Way due to it being a core component of the County's highway network in a strategic capacity. New developments there would increase traffic and exacerbate congestion on the Fosse Way both at Bretford Bridge and at the complex junction with the A423 and B4453 at Princethorpe.

Site 81 is located outside the established village boundary and in the Green Belt. If the Green Belt boundary was moved to facilitate the proposed new development, there is no further physical feature available to define a defensible boundary to prevent further encroachment on the countryside. This would not comply with the NPPF³¹.

A similar site (S16018) for 52 dwellings on 3.3ha was rejected during the previous plan development. It was considered as inappropriate for development, mainly on grounds of access and landscape impact. Site 81 remains inappropriate for development because of access issues, landscape impact, harm to the Green Belt and the unsustainable nature of the location.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

There are several issues in the proposed plan that are interlocked so they cannot be resolved satisfactorily by individual changes.

The dispersed strategy should be changed to a strategy that directs development to brownfield sites and the urban area. Development must be constrained by the carbon budget. The Green Belt should be protected. Allocations in rural villages should be removed.

³¹ NPPF paragraph 149f)

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

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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

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

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

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

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

To explain the interlocking nature of the issues raised.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

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

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Part B6 – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: Alan Yates

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	6				

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.

Site 6, Land east of Fosse Way, Stretton on Dunsmore

Like several of the so-called Main Rural Settlements, Stretton on Dunsmore has a shop, a GP surgery, a pub and a primary school and has a few buses a day but this does not make it sustainable to anything like the degree of the main urban area. Stretton has poor access by non-car modes and remains extremely car dependent. The SA confirms³² that access to Coventry and Rugby is a key consideration even though there is no requirement to provide for unmet need from Coventry. Stretton's proximity to the A45 does not make travel by car sustainable. In fact, village centre congestion, unsuitable minor roads and problematic junctions make Stretton unsuitable for more traffic.

As recognised in the SA,³³ demand exceeds capacity in Knightlow Primary school in Stretton throughout the plan period. Further expansion of the village without a committed and funded plan to expand the school is contrary to the claimed sustainability benefit.

³² Sustainability Appraisal paragraphs 5.4.8 and 5.4.77

³³ Sustainability Appraisal paragraph 5.2.49

As described in the section on Green Belt (Form B3), the rationale for allocating this site is irrational. Site 6 is estimated to accommodate just three dwellings. Inclusion of this site is not consistent with the PPG, as described in the Housing and Economic Land Availability Assessment (HELAA)³⁴. Sites with capacity for fewer than 5 dwellings should not be allocated.

Site 6 is located on the Fosse Way opposite Knob Hill in Stretton on Dunsmore. Knob Hill is one arm of an offset cross-roads (with Frankton Lane) in a dip on the Fosse Way (B4455). From the side roads, there is little time to see traffic on the Fosse Way approaching over the brow of the hill from the north even though the speed limit there is 30mph - this limit is widely breached presenting a persistent safety issue. Traffic coming from the south on the Fosse Way can legitimately approach over the brow of the hill at 60mph before (supposedly) slowing to 30mph just before the cross-roads. This already makes the area near the junction problematic.

New access on the Fosse Way in the vicinity of this problematic junction would add to safety concerns. In the past, the Highways Authority have stated that they would not support any new accesses to be created off the Fosse Way due to it being a core component of the County's highway network in a strategic capacity. New developments there would increase congestion on the Fosse Way both at Bretford Bridge and at the complex junction with the A423 and B4453 at Princethorpe.

Site 6 is in the Green Belt and currently it helps to constrain ribbon development along the Fosse Way. It is located outside the established village boundary on the far side of the Fosse Way from the village centre, leading to poor connectivity and public transport access. If the Green Belt boundary was moved to enable new development on the far side of the Fosse, there is no further physical feature available to define a clear and permanent boundary to prevent further encroachment on the countryside. This would not comply with the NPPF³⁵.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

³⁴ HELAA paragraph 4.6

³⁵ NPPF paragraph 149f)

There are several issues in the proposed plan that are interlocked so they cannot be resolved satisfactorily by individual changes.

The dispersed strategy should be changed to a strategy that directs development to brownfield sites and the urban area. Development must be constrained by the carbon budget. The Green Belt should be protected. Allocations in rural villages should be removed.

In particular, if Site 6 was not rejected, its rationale could be used for any small site in the Green Belt anywhere (as described in Form B3, the perverse logic that 'it should be included in the allocations because it could not be included in the windfall sites because it is in the Green Belt'). Allocation of Site 6 would set a dangerous precedent for any small site in the Green Belt.

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

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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

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

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

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

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

To explain the interlocking nature of the issues raised.

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.

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Appendix - a case study of a real-world housing development on a small site in a village in the Green Belt

This case study examines the outcome of a housing development on a small site in the Green Belt on the edge of Stretton on Dunsmore. The site is located near the A45 about 100 metres from the proposed Site 348 (The Croft) with an area of 0.5 hectares. It was previously in commercial use, built as a pub in the 1930s as shown in the photograph³⁶ below:



Its last use was as a restaurant before it was vandalised and damaged by fire. In 2012, a planning application was submitted for houses on the site (R12/1128), originally for 15 houses with a mix of types and sizes:

	2-bed terrace	2-bed detached	3-bed semi	3-bed detached	4-bed detached	5-bed detached
Original plan	3	2	2	1	5	2

This amounted to more than doubling the volume of built development on the site and was judged³⁷ to be "*significantly inappropriate development*" in the Green Belt. During a protracted plan process, viability claims were made and eventually the plan was approved for just 7 houses:

³⁶ As described in 'Stretton on Dunsmore - the Making of a Warwickshire Village' ISBN 0 9537462 0 8

³⁷ Officer's Report for R12/1128

	2-bed terrace	2-bed detached	3-bed semi	3-bed detached	4-bed detached	5-bed detached	6-bed detached
Original plan	3	2	2	1	5	2	0
Approved plan	0	0	0	0	0	2	5

The approved application still represented an 86% increase in cumulative built volume but **failed to include any affordable houses**. It failed to comply with policies in the local plan (e.g. policy H1 or Policy H2) but was eventually approved in detail in 2021 (R20/0363). The houses were finally built in 2023-24 and marketed as Edgeway Gardens with the least expensive house on sale at £750,000. A current view of the site is shown below:



It is clear that:

- It failed to deliver any affordable housing at all despite policies demanding this;
- The development took more than a decade, so did not contribute to the rapid increase in housing starts through small sites as expected in the proposed local Plan;
- There is very little diversification of house size and type;
- It represents a very substantial increase in cumulative built volume in the Green Belt, which is especially damaging because of the much greater height and density of the new buildings, reducing openness;
- The site is very car-dependent and has created no sustainability benefit to the village of Stretton on Dunsmore;

- It has caused harm to the Green Belt, intensifying ribbon development and reducing openness.

This real-world example shows that the assertions in the proposed Plan of the benefits of small sites in Green Belt villages are not realised in practice. There is evidence that building houses in villages in the Green Belt causes harm rather than benefit. The assertions in the proposed Plan are not based on robust evidence.