



7 July 2026

RUGBY BOROUGH COUNCIL

A meeting of Rugby Borough Council will be held in the Council Chamber at the Town Hall, Rugby at 7.00pm on Wednesday 15 July 2026.

Members of the public may also view the meeting via the livestream available on the Council's website.

Dan Green
Chief Executive

A G E N D A

PART 1 – PUBLIC BUSINESS

1. Apologies for absence.

2. Minutes.

To approve the minutes of the meeting held on 17 June 2026.

3. Declaration of Interests.

To receive declarations of -

(a) disclosable pecuniary interests as defined by the Council's Code of Conduct for Councillors;

(b) other registrable interests as defined by the Council's Code of Conduct for Councillors; and

(c) non-registrable interests as defined by the Council's Code of Conduct for Councillors.

4. To receive the Mayor's Announcements.

5. Questions pursuant to Standing Order 10.

6. To receive the reports of Cabinet and Committees which have met since the last meeting of the Council and to pass such resolutions and to make such orders thereon as may be necessary:

(a) Cabinet – 29 June 2026

- (1) Rugby Town Centre Public Realm Priority Project – Growth and Investment Portfolio.
- (2) The Benn Hall – Capital Programme Refurbishment – Partnerships, Health and Wellbeing Portfolio.
- (3) Rugby Art Gallery and Museum Development - Partnerships, Health and Wellbeing Portfolio.
- (4) Capital Funding for the purchase of Council Fleet – Environment and Climate Portfolio.
- (5) Great Central Walk Bridge Structural Remediation - Environment and Climate Portfolio.

7. To receive and consider the reports of officers.

- (a) Local Plan submission for examination and strategic environmental assessment - report of the Strategic Director – Place.
- (b) Appointment of Section 151 Officer – report of the Monitoring Officer.
- (c) Decision taken in exceptional circumstances – report of the Monitoring Officer.

8. Notices of Motion pursuant to Standing Order 11.

(a) "That this Council:

1. Recognises the critical issue of veterans facing homelessness and the need for immediate action to support those at risk;
2. Requests that Cabinet investigates how the Council might gain access to funding available through The National Plan to End Homelessness, including the £159 million grant referenced in national announcements;
3. Requests that Cabinet brings forward proposals for a comprehensive support programme for veterans at risk of homelessness, addressing housing assistance, mental health support, and job training, for consideration within the Council's approved budgetary framework, and in accordance with the Budget and Policy Framework Procedure Rules where any change to existing resource allocation is proposed;
4. Calls upon Cabinet to ensure that relevant departments collaborate and consult with veteran organisations, non-profits, and charities to enhance access to services;
5. Requests that Cabinet examines all available mechanisms within existing housing legislation, guidance and policy that could be used to better support veterans and members of the Armed Forces community;
6. Requests that Cabinet considers whether any amendments to the Council's Housing Allocations Policy or associated procedures could strengthen support for veterans whilst remaining compliant with statutory requirements;
7. Requests a report be delivered back to the relevant scrutiny committee and thereafter to Cabinet for consideration."

Proposer: Councillor Kyle Stewart
Seconded: Councillor Devenne Kedward

(b) "That this Council:

1. Recognises that fly tipping is a blight on our local communities, and a potential hazard to people and the environment;
2. Requests that Cabinet, working with the relevant portfolio holder and officers, provides costings for the roll-out of a bulky waste amnesty scheme on a trial basis, with results to be correlated against fly-tipping reports recorded during the trial period;
3. Requests that Cabinet directs officers to undertake an urgent review of all logged reports of fly tipping, and to produce a remediation plan to clear the existing backlog, within existing budgetary provision;
4. Requests that Cabinet introduces a KPI tracking the number of fly-tipping reports, the time taken to respond to the complainant, and the time taken to clear the waste following a report;
5. Requests a report be delivered back to the relevant scrutiny committee and thereafter to Cabinet for consideration, on the performance of the proposed trial, and the feasibility of a longer-term provision of the service."

Proposer: Councillor Kyle Stewart
Seconded: Councillor Andrew Glowacki

9. Motion to exclude the public under Section 100(A)(4) of the Local Government Act 1972

To consider the following resolution:

"under Section 100A(4) of the Local Government Act 1972 the public be excluded from the meeting for the following item on the grounds that it involves the likely disclosure of exempt information defined in paragraph 3 of Part 1 of Schedule 12A of the Act, and that in all the circumstances of the case the public interest in maintaining the exemption outweighs the public interest in disclosing the information."

PART 2 – EXEMPT INFORMATION

1. To receive and consider the reports of officers.
(a) Decision taken in exceptional circumstances – private report of the Monitoring Officer.

QUESTIONS AT COUNCIL

A Councillor may ask a question at the meeting by giving notice in writing of the question to the Chief Executive no later than midday on Thursday 9 July 2026. The rules relating to Questions are set out in Part 3a of the Council's Constitution.

REPORT OF CABINET

29 June 2026

PRESENT:

Councillors Robinson (Chair), C Edwards, S Edwards, McKenzie, Mistry, Pimm and Roodhouse.

Councillors Gillias, Poole, Stewart and Ward were also in attendance.

1. RUGBY TOWN CENTRE PUBLIC REALM PRIORITY PROJECT

Cabinet considered the report of the Strategic Director - Place concerning Council approval for the allocation of monies from the Town Centre Budget to advance project 1 of the Public Realm Masterplan (2025) to RIBA stage 4 (final design). The report is available here:

[Cabinet 29 June 2026 report - Rugby Town Centre Public Realm Priority Project](#)

Recommendation of Cabinet

Cabinet decided to recommend to Council that £0.314m (revenue) of the Town Centre Budget be allocated to progress priority projects 1 within the Public Realm Masterplan (2025) to RIBA stage 4.

Recommended that – the recommendation of Cabinet be approved.

2. THE BENN HALL – CAPITAL PROGRAMME REFURBISHMENT

Cabinet considered the report of the Strategic Director - Place concerning a capital budget request for the for a refurbishment programme for The Benn Hall. The report is available here:

[Cabinet 29 June 2026 report - The Benn Hall - Capital Programme Refurbishment](#)

Recommendation of Cabinet

Cabinet decided to recommend to Council that –

- (1) a supplementary General Fund capital budget of £0.179m be approved and added to the 2026/27 capital programme for the refurbishment of the Benn Hall, to be financed through borrowing; and
- (2) delegated authority be given to the Assistant Director Leisure & Wellbeing to enter into necessary contracts following procurement process.

Recommended that – the recommendation of Cabinet be approved.

3. RUGBY ART GALLERY AND MUSEUM DEVELOPMENT

Cabinet considered the report of the Strategic Director - Place concerning Council approval for the submission of an application to the National Lottery Heritage Fund for the modernisation and re-development of Rugby Art Gallery and Museum including the required match funding as set out within the body of the report. The report is available here:

[Cabinet 29 June 2026 report - Rugby Art Gallery and Museum Development](#)

Recommendation of Cabinet

Cabinet decided to recommend to Council that –

- (1) delegated authority be given to the Assistant Director Leisure and Wellbeing to submit an application to the National Lottery Heritage Fund and progress through outlined grant phases if successful;
- (2) if National Lottery Heritage Funding is obtained match funding of £2m be funded from the business rates equalisation reserve for the capital re-development of Rugby Art Gallery and Museum be approved; and
- (3) delegated authority be given to the Assistant Director Leisure and Wellbeing to submit an application to funding bodies in relation to the RAGM Redevelopment project to secure additional grant funding, including the Clore Duffield Foundation.

Recommended that – the recommendation of Cabinet be approved.

4. CAPITAL FUNDING FOR THE PURCHASE OF COUNCIL FLEET

Cabinet considered the report of the Strategic Director – Operations and Transformation concerning proposed funding for the purchase of the Council's fleet. The report is available here:

[Cabinet 29 June 2026 report - Capital Funding for the Purchase of Council Fleet](#)

Recommendation of Cabinet

Cabinet decided to recommend to Council that a supplementary General Fund capital budget of £0.992m be approved and added to the capital programme for 2026/27 for the procurement of replacement vehicles to be financed through borrowing.

Recommended that – the recommendation of Cabinet be approved.

5. GREAT CENTRAL WALK BRIDGES STRUCTURAL REMEDIATION

Cabinet considered the report of the Strategic Director – Operations and Transformation together with an addendum and additional appendix showing an equality impact assessment, concerning proposed capital funding for structural monitoring, vegetation clearance, and critical remediation of bridges along the Great Central Walk. The report is available here:

[Cabinet 29 June 2026 report - Great Central Walk Bridges Structural Remediation](#)

Recommendation of Cabinet

Cabinet decided to recommend to Council that a supplementary General Fund capital budget of £1.925m be approved and added to the 2026/27 capital programme for bridge improvements along the Great Central Walk, to be financed through borrowing.

Recommended that – the recommendation of Cabinet be approved.

**COUNCILLOR LOUISE ROBINSON
CHAIR**

AGENDA MANAGEMENT SHEET

Report Title:	Local Plan submission for examination and strategic environmental assessment
Name of Committee:	Council
Date of Meeting:	15 July 2026
Report Director:	Strategic Director - Place
Portfolio:	Growth and Investment
Ward Relevance:	All
Prior Consultation:	Leadership Team; Portfolio Holder for Growth and Investment
Contact Officer:	Neil Holly, Development Strategy Manager
Public or Private:	Public
Report Subject to Call-In:	No
Report En-Bloc:	No
Key Decision:	Yes
Corporate Priorities:	This report relates to the following priority(ies): ☒ A Healthier Rugby – To support people to live healthier, longer, and more independent lives. ☒ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre. ☒ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change. ☒ A Fairer Rugby – To reduce inequalities and improve housing across the Borough. Corporate Strategy 2025-2035 ☐ This report does not specifically relate to any Council priorities but
Summary:	The report seeks reaffirmation of the decision of Council of 27 January 2026 to submit its local plan for examination. The report summarises the sustainability appraisal of the local plan and summarises responses to the Regulation 19 consultation.

As detailed in the body of the report, in light of ongoing litigation elsewhere in the country, it is considered prudent based on legal advice to consider the responses and, if appropriate, to reaffirm the decision to submit the plan.

This action will protect the council from potential claims or challenge that it has not complied with The Environmental Assessment of Plans and Programmes Regulations 2004.

**Local Government
Reorganisation Implications:**

If the recommendation were not to be approved and the Council were instead to decide to proceed to withdraw the local plan from examination then it is unlikely there would be sufficient time available for an amended local plan to be reconsulted upon and resubmitted for examination before the 31 December 2026 deadline for submitting plans for examination under the legacy system as set out in Paragraph 4(4) of Schedule 1 to The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026.

Plan-making under the new system would not be able to be completed ahead of the local government reorganisation date in Warwickshire of 1 April 2028. Thereafter, a decision as to whether to continue with a local plan (at whatever stage it had reached) would be for the successor unitary authority.

A successor unitary authority would under Regulation 19 of The Local Government (Structural Changes) (Transitional Arrangements) (No. 2) Regulations 2008 as amended by The Local Government (Structural Changes) (General) (Amendment) Regulations 2018 be required to adopt a local plan for the whole of its area within a period of five years starting with the reorganisation date.

In the interim, the development plan would continue to be the Local Plan 2011-2031 (adopted 2019). This plan would become increasingly out-of-date meaning it would be given less weight in decision making exposing the area to speculative development.

Financial Implications:

The costs of the local plan examination will be met from within existing budgets.

As noted above, withdrawing the plan from examination would necessitate the commencement of work on a new local plan under the new system. This would require commissioning new/updated evidence.

Risk Management/Health and Safety Implications:

A Local Plan Risk Register was reported to Scrutiny Committee on 16 September 2025: <https://rugby.gov.uk/web/quest/l/60895758>

Environmental Implications:

A climate change and environmental impact assessment was attached to the 6 January 2026 cabinet report. That report is reattached as appendix 9.

The proposed submission local plan is supported by a sustainability appraisal (Appendix 3) prepared as required by Section 19(5) of the Planning and Compulsory Purchase Act 2004 and a Habitat Regulations Assessment (Appendix 4). The Sustainability Appraisal also meets the requirement for a strategic environmental assessment in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004.

See the main body of this report for further information in relation to the sustainability appraisal.

Legal Implications:

The Local Plan was submitted to the Secretary of State for independent examination in accordance with Regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012 and section 20 of the Planning and Compulsory Purchase Act 2004.

Under Section 20 of the 2004 Act, the purpose of the independent examination is to determine whether the local plan satisfies the relevant legal requirements of the 2004 Act and 2012 Regulations and whether it is 'sound'.

Relevant legal requirements include compliance with The Environmental Assessment of Plans and Programmes Regulations 2004 and this is considered in the main body of this report.

The assessment of soundness is made having regard to government planning policy and guidance. The tests of soundness are set out in paragraph 36 of the National Planning Policy Framework. To paraphrase, they are that the plan is positively prepared (i.e. meets assessed development needs); is justified as an appropriate strategy taking account of reasonable alternatives and based on proportionate evidence; is effective i.e. deliverable over the plan period; and is consistent with national policy.

Only after planning inspector(s) appointed by the Secretary of State have completed independent examination and found the plan to meet the legal requirements and to be sound can it be adopted by the council.

If the plan is found sound and is adopted by the council, the new Local Plan would supersede the existing Local Plan 2011-2031 (adopted 2019).

Equality and Diversity:

An Equalities Impact Assessment was prepared for the 6 January 2026 cabinet report. This report is reattached as Appendix 10.

Options:

The options are, having considered the responses to the Regulation 19 consultation, to either:

- (1) Reaffirm the decision of Council of 27 January 2026 to submit the local plan for examination; or
- (2) Under section 22 of the Planning and Compulsory Purchase Act 2004 withdraw the local plan from examination.
- (3) Do nothing

Recommendation:

That, having considered the responses to the Regulation 19 consultation, the Council reaffirms its decision of 27 January 2026 to submit to the Secretary of State for independent examination the Submission Local Plan and the other submission documents including the Regulation 19 representations and a summary of those representations.

Reasons for Recommendation:

As detailed in the body of the report, it is considered prudent for Council to consider and if felt appropriate reaffirm its decision to submit the

plan for examination having considered the responses to the Regulation 19 public consultation.

The barrister advising the Council on the local plan examination has recommended that this step be taken to mitigate any risk that may result from a future High Court decision against another Council.

This will ensure that the Council can demonstrate that the sustainability appraisal report on the local plan and opinions expressed on this and the draft plan were taken into account at all stages of plan preparation prior to its adoption. Therefore, it will help the Council demonstrate compliance with The Environmental Assessment of Plans and Programmes Regulations 2004.

Council - 15 July 2026

Local Plan submission for examination and strategic environmental assessment

Public Report of the Strategic Director - Place

Recommendation

That, having considered the responses to the Regulation 19 consultation, the Council reaffirms its decision of 27 January 2026 to submit to the Secretary of State for independent examination the Submission Local Plan and the other submission documents, including the Regulation 19 representations and a summary of those representations.

1 Executive Summary

- 1.1 The report seeks reaffirmation of the decision of Council of 27 January 2026 to submit its local plan for examination.
- 1.2 The report summarises the sustainability appraisal of the local plan and summarises responses to the Regulation 19 consultation.
- 1.3 In light of ongoing litigation elsewhere in the country, it is considered prudent based on legal advice to consider and, if appropriate, reaffirm the decision to submit the plan.
- 1.4 This will protect the Council from any potential claims that it has not complied with The Environmental Assessment of Plans and Programmes Regulations 2004.

2 Appendices

- 2.1 This report includes the following appendices:

- Appendix 1 – Submission Local Plan
- Appendix 2 – Submission policies map
- Appendix 3a – Sustainability Appraisal report
- Appendix 3b – Sustainability Appraisal report non-technical summary
- Appendix 4 – Habitats Regulation Appropriate Assessment
- Appendix 5 – Regulation 22 Consultation Statement
- Appendix 6 – Addendum to Regulation 22 Consultation Statement

- Appendix 7 – Submission covering letter
- Appendix 8 – Schedule of suggested modifications
- Appendix 9 – Climate change and environmental impact assessment
- Appendix 10 – Equality impact assessment

3 Background

- 3.1 On 26 January 2026 [Council resolved](#) to publish the Proposed Submission Local Plan, Policies Map, Sustainability Appraisal and other supporting documents (together the “proposed submission documents”) for six weeks’ consultation.
- 3.2 Council resolved to delegate authority to the Chief Officer for Growth and Investment in consultation with the Portfolio Holder for Growth and Investment after the close of the public consultation to submit to the Secretary of State for independent examination the proposed submission documents, together with copies of the representations received in response to the consultation and a summary of the main issues raised in those representations.
- 3.3 Council also delegated to the Chief Officer for Growth and Investment to (if required) prepare a list of proposed changes to the plan needed to address issues raised in the Regulation 19 consultation responses and submit the same to the Secretary of State.
- 3.4 The public consultation took place between Friday 30 January and Friday 13 March 2026. All responses to the consultation were published on the council’s website on 27 April 2026 and can be accessed here: <https://www.rugby.gov.uk/w/proposed-submission-local-plan-consultation-responses>
- 3.5 A report of the main issues raised in the consultation was prepared and is **Appendix 6** to this report. A schedule of proposed modifications to the plan, in response to the representations, was prepared and is **Appendix 8**. The Council cannot modify the plan without repeating the Regulation 19 consultation. Instead, the need for modifications to the plan will be determined by the inspectors through the examination process.
- 3.6 On 27 April 2026 Rugby Borough submitted to the Secretary of State for examination the proposed submission documents, together with the representations received, the report on those responses, the proposed modifications and other documents as detailed in the submission covering letter (**Appendix 7**).
- 3.7 At the time of writing, inspectors have been appointed to conduct the examination, but no timetable for the examination has yet been published. The examination website can be accessed here: <https://www.localplanservices.co.uk/rugbylocalplanexamination>

4 Why is Council being asked to reaffirm its decision to submit the plan for examination?

- 4.1 Council's decision to resolve to publish the proposed submission local plan for examination and approve its subsequent submission for examination was not an unusual one. Several other local authorities including Milton Keynes Council, Portsmouth City Council, Camden Council and South Gloucestershire Council that have recently submitted their plans for examination followed the same procedure and plans which followed that procedure have successfully passed examination and been adopted (for example, recently Uttlesford District).
- 4.2 However, it has come to the attention of officers that there is a currently live judicial review claim against Oxford City Council in respect of it following the same procedure. That claim is R (Friends of the Fields, Iffley) v Oxford City Council and has been reported in the planning press.
- 4.3 Reporting of the claim indicates that the claimants argue that by simultaneously resolving to publish its local plan for consultation and thereafter submit it for examination, Oxford City Council was in breach of Regulation 8 of The Environmental Assessment of Plans and Programmes Regulations 2004. The 2004 Regulations give effect in English law to EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.
- 4.4 Regulation 8 requires that before any plan is adopted account shall be taken of the environmental report prepared under the Regulations (this is the sustainability appraisal report) together with opinions expressed in response to consultation on the draft plan and that report.
- 4.5 The claimants argue that this requirement doesn't just apply on adoption of the plan, but also at the point of its submission to the government for independent examination. They argue that by resolving to submit its plan for examination before taking account of the responses to the Regulation 19 consultation, Oxford City Council was in breach of Regulation 8. It is understood that Oxford City Council contests that claim.
- 4.6 On 22 May 2026 the claimants were given leave by the High Court to continue with their claim on the basis that it is "arguable". The date of the substantive hearing on the claim is not known but may be several months away. The claimants may not be successful in their claim.
- 4.7 The claim against Oxford City Council is on a novel point of law that hasn't been litigated before. It is not made clear in either the 2004 Regulations nor the 2012 Local Planning Regulations that the requirement to take into account consultation responses applies at the point of resolving to submit a plan for examination for examination, and it has been common practice to resolve to submit plans for examination prior to the Regulation 19 consultation.
- 4.8 Officers consider that the approach taken by Council was both reasonable based on established practice and lawful. However, counsel has advised the Council to consider and (if felt appropriate) reaffirm its decision to submit the plan for examination having considered the responses to the public consultation.

- 4.9 This will ensure that the Council can demonstrate that the sustainability appraisal report and opinions expressed on this and the draft plan were taken into account at all stages of plan preparation prior to its adoption. This would protect the Council from the possible consequences of the future Oxford City Council High Court decision. **Update** on 26 June 2026 the Friends of the Fields, Iffley v Oxford City Council claim was settled on the basis that Oxford City Council would hold a new council meeting to consider submission of the plan in light of its Regulation 19 consultation responses. This reflects the approach recommended by the RBC's barrister.
- 4.10 The remainder of this report summarises the Sustainability Appraisal report (**Appendix 3** which is the environmental report prepared pursuant to the 2004 Regulations) together with the responses to the Regulation 19 consultation.
- 4.11 Other salient points about the proposed submission local plan and its preparation were set out in the report to Cabinet of 6 January which was subsequently considered by Council on 26 January. Those points are not repeated here, but this report should be read in conjunction with that report which can be accessed here: [Cabinet 6 January 2026 report - Rugby Local Plan 2025-2042 Regulation 19 consultation and submission](#)

5 The Sustainability Appraisal report

- 5.1 The Sustainability Appraisal (SA) report was included in the papers for the 6 January 2026 cabinet and 26 January 2026 council meetings. The SA report is the environmental report required to be prepared under the 2004 regulations.
- 5.2 The SA report was prepared on behalf of the Council by AECOM. It assessed the spatial strategy of the submission Local Plan as well as the 'reasonable alternatives' to that spatial strategy against a range of sustainability topics including access to infrastructure, communities, economy, homes, historic environment, landscape and transport, drawing on the findings of the Local Plan evidence base. It also provides an appraisal on the sustainability of other policies within the plan.
- 5.3 Regarding the employment strategy, the report identified four growth scenarios i.e. alternative approaches to meet the Borough's need. These were 1) the proposed submission approach; 2) replacing Walsgrave Hill with Prologis/Mountpark, Ryton-on-Dunsmore; 3) replacing Walsgrave Hill with North of Houlton; 4) replacing Walsgrave Hill with 2 sites in Thurlaston.
- 5.4 The appraisal identified pros and cons across all scenarios to be considered by the Council but noted that scenario 4 performed particularly poorly in isolation. The Council weighed up the findings and concluded that the strong performance of scenario 1 in terms of transport and economy/employment is significant and is therefore the best option for sustainable development.
- 5.5 Regarding the housing strategy, the report considered each settlement with potential for allocations in turn as well as possible urban extensions to Rugby or new settlements to identify eight different growth scenarios for housing. These were 1) the proposed submission approach; 2) replacing greenfield allocations at Long Lawford with omission sites in Dunchurch and Hillmorton; 3) replacing

greenfield allocations at Long Lawford with omission site North West Rugby (Cosford); 4) replacing greenfield allocations at Long Lawford with omission sites in Dunchurch, Hillmorton and North West Rugby (Cosford); 5) the proposed submission approach plus omission sites in Dunchurch and Hillmorton; 6) the proposed submission approach plus the omission site North West Rugby (Cosford); 7) the proposed submission approach plus the omission sites in Dunchurch and Hillmorton and North West Rugby (Cosford); 8) the proposed submission approach plus the omissions sites in Dunchurch and Hillmorton and Lodge Farm.

- 5.6 The appraisal identified pros and cons across all scenarios to be considered by the Council but noted that scenario 1 performed well in some areas, but other scenarios performed better in terms of biodiversity, communities, and homes. Scenario 8 including Lodge Farm did not perform well in many categories. Scenarios with higher growth at Long Lawford performed better in terms of transport and access to community infrastructure. Scenarios with higher growth at Dunchurch and Hillmorton also performed well. The Council concluded that a higher overall growth scenario is not advantageous and that the proposed submission approach represents a sustainable and appropriate spatial strategy.
- 5.7 It was not considered that there were any reasonable alternative approaches to the proposed strategy for gypsy and traveller site allocations.
- 5.8 The appraisal of wider plan policies assessed the potential impact of the plan against a baseline in which development takes place without an up-to-date local plan. It identified significant positive effects for economy/employment and homes; moderate or uncertain positive effects for access to infrastructure, communities/health/wellbeing, and transport; and moderate or uncertain negative effects for resources of the plan compared to the baseline. Neutral effects were predicted for other aspects, including biodiversity, historic environment, landscape and water. The report also noted the scope to make some albeit limited modifications to the plan during the examination.

6 Summary of Responses to the Regulation 19 consultation

- 6.1 680 respondents submitted representations to the Regulation 19 consultation. This included 46 group representations submitted on behalf of a list of named respondents. The Council therefore received representations submitted by or on behalf of 6025 individuals or other entities.
- 6.2 533 representations were made by residents or other individuals, 67 were made by landowners or site promoters, 30 were made by other organisations, 19 were made by parish councils, eight were made by statutory consultees, and three were made by neighbouring authorities.
- 6.3 The policies and sites which attracted the most responses are summarised in the tables below. The key issues raised in respect of each of these policies and sites and all other policies of the plan are summarised in Appendix 6 to this report.

Policy	No of. Responses	Key issues
S1 settlement hierarchy	7 representations obo 7 respondents supported 157 representations obo 907 respondents objected	- Continued identification of villages as main rural settlements - Restrictions on scale of development outside the town
S2 Strategy for homes	9 representations obo 9 respondents supported 115 representations obo 1,163 respondents objected	- Affordable housing delivery - Supporting economic growth - Housing requirement figure is too high or too low - Plan period length
S4 Sites for Gypsies and Travellers	6 representations obo 299 respondents supported 2 representations obo 113 respondents objected	- Green Belt - Insufficient number of pitches planned for - Distribution of pitch allocations is uneven
S6 Residential allocations (not including site specific comments)	24 representations obo 322 respondents supported 205 representations obo 956 respondents objected	- Green Belt - Infrastructure provision - Inclusion/omission of specific sites
S7 Employment allocations (not including site specific comments)	3 representations obo 3 respondents supported 31 representations obo 143 respondents objected	- Green Belt - Inclusion/omission of specific sites
CL2 Renewable energy and low carbon technology	No representations in support 93 representations obo 143 respondents objected	Identification of land near Houlton as potentially suitable for wind turbine development
W1 Protection of community facilities	114 representations obo 1,809 respondents supported 12 representations obo 12 respondents objected	Retention of Coventry Stadium, Brandon for speedway, stock car racing and other community uses
EN3 Rainsbrook Valley landscape of elevated sensitivity	15 representations obo 898 respondents supported 14 representations obo 312 respondents objected	- Designation area to be expanded/contracted - Justification and evidence - Wording to be strengthened/loosened
EN4 Areas of separation	14 representations obo 897 respondents supported	- Designation area to be expanded/contracted - Justification and evidence

Policy	No of. Responses	Key issues
	13 representations obo 15 respondents objected	• Wording to be strengthened/loosened

Site	No of. Responses	Key issues
121 Walsgrave Hill	No representations in support 11 representations obo 117 respondents objected	• Landscape • Heritage impact • Green Belt
64 Coton Park East	1 representation obo 1 respondent supported 52 representations obo 641 respondents objected	• Impact on residential area • Traffic and highways • Green space
17 South West Rugby	No representations in support 5 representations obo 889 respondents objected	• Scale of allocation • Impact on surrounding area
337 West Farm and Home Farm, Brinklow	1 representation obo 1 respondent supported 36 representations obo 306 respondents objected	• Green Belt • Infrastructure provision • Traffic and highways • Heritage impact
315 Land south of Rugby Road, Brinklow	No representations in support 57 representations obo 328 respondents objected	• Green Belt • Infrastructure provision • Traffic and highways • Heritage impact
59 Newton Manor Lane, Brownsover	3 representations obo 4 respondents supported 29 representations obo 558 respondents objected	• Infrastructure provision • Traffic and highways • Flood risk
253 Lawford Fields Farm, Long Lawford	2 representations obo 2 respondents supported 17 representations obo 532 respondents objected	• Green Belt • Infrastructure provision • Traffic and highways
316 Land at Long Lawford	No representations in support 14 representations obo 529 respondents objected	• Green Belt • Infrastructure provision • Traffic and highways • Scale of proposal
39 Dyers Lane, Wolston	No representations in support	• Green Belt • Infrastructure provision

Site	No of. Responses	Key issues
	14 representations obo 242 respondents objected	
136 North of Warwick Road, Wolston	1 representation obo 1 respondent supported 20 representations obo 248 respondents objected	• Green Belt • Infrastructure provision • Suitability for older persons' accommodation
358 Land at Coventry Road, Wolvey	1 representation obo 1 respondent supported 170 representations obo 176 respondents objected	• Green Belt • Infrastructure provision • Car dependency
309 Land north of B4109, Wolvey	1 representation obo 1 respondent supported 206 representations obo 212 respondents objected	• Green Belt • Infrastructure provision • Car dependency • Ecology

- 6.4 As noted above, responses were received from a number of organisations including duty to cooperate partners. As is detailed in Appendix 7, statements of common ground were subsequently entered into with Historic England, Natural England, the Environment Agency, Highways England, Severn Trent Wayer, NHS Coventry and Warwickshire Integrated Care Board, Warwickshire County Council and all neighbouring district councils. The statements of common ground can be viewed on this page: <https://www.rugby.gov.uk/w/local-plan-evidence-base#additional-documents-produced-after-the-regulation-19-consultation>
- 6.5 At the time of plan submission statements of common ground were not yet concluded with Stratford on Avon District Council – the statement is agreed but is still awaiting signature – and Historic England – this is now signed and will be added to the examination website by the time this report is published.
- 6.6 There are no significant outstanding matters of disagreement with the organisations with whom statements of common ground have been entered into except for Historic England. Historic England maintains an objection to the Walsgrave Hill employment allocation based on harm to the setting of Coombe Abbey Registered Park and Garden. The Council's position is that the public benefits of the site allocation, including the delivery of a new blue light route to University Hospital and the creation of a 75ha country park alongside Coombe Abbey, outweigh the heritage harm. If members resolve to reaffirm submission of the plan, this will be a matter considered by the inspectors examining the plan.

Name of Meeting: Council

Date of Meeting: 15 July 2026

Subject Matter: Local Plan submission for examination and strategic environmental assessment

Originating Department: Place

DO ANY BACKGROUND PAPERS APPLY

☒ **YES**

☐ **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
	Local Development Scheme https://rugby.gov.uk/w/local-development-scheme
	Cabinet 6 January 2026 report - Rugby Local Plan 2025-2042 Regulation 19 consultation and submission
	Local Plan Regulation 19 consultation responses: https://www.rugby.gov.uk/w/proposed-submission-local-plan-consultation-responses

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Appendix 1 – Submission Local Plan

The submission local plan can be accessed on the following link:

<https://www.rugby.gov.uk/documents/20124/62549387/Proposed+submission+local+plan+January+2026.pdf/5ec2da73-f1b6-9659-9922-b445aebe0b88?t=1769686285982>

Appendix 2 – Submission policies map

The submission policies plan can be accessed on the following links:

<https://www.rugby.gov.uk/documents/20124/62549387/Rugby+Borough+and+Rugby+Town+Policies+Maps.pdf/eccb0cca-5ccd-7704-6356-4ebfe1daa8b5?t=1769682953840>

<https://www.rugby.gov.uk/documents/20124/62549387/Inset+Policies+Maps.pdf/60236ca3-f255-3502-a5c0-039b83b20075?t=1769683016767>

Sustainability Appraisal (SA) of the Rugby Borough Local Plan

SA Report

December 2025

Quality information

Prepared by	Checked by	Verified by	Approved by
EH, Senior Consultant	Mark Fessey, Associate Director	Ian McCluskey, Associate Director	Nick Chisholm-Battern, Technical Director

Prepared for:
Rugby Borough Council

Prepared by:

AECOM Limited
The Colmore Building
20 Colmore Circus Queensway
Birmingham, B4 6AT
United Kingdom

aecom.com

© 2025 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") in accordance with its contract with Rugby Borough Council (the "Client") and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of Contents

1. Introduction	1
2. The plan scope	2
3. The SA scope	10
Part 1: Work to date	12
4. Introducing Part 1	13
5. Defining growth scenarios.....	14
6. Growth scenarios appraisal	56
7. The preferred approach	74
Part 2: SA findings at this stage?	75
8. Introducing Part 2	76
9. Appraisal of the Proposed Submission Local Plan	78
Part 3: Next steps.....	91
10. Plan finalisation.....	92
11. Monitoring	92
Appendix I: Regulatory requirements	93

1. Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Rugby Borough Local Plan being prepared by Rugby Borough Council.
- 1.1.2 Once adopted, the plan will set a strategy for growth and change up to 2042, allocate sites to deliver the strategy, and establish policies against which planning applications will be determined.
- 1.1.3 SA is a process for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.¹

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives” with a particular focus on appraising “significant effects”.
- 1.2.3 More specifically, the SA Report must:
 - explain **work to date** and, in particular, appraisal of ‘reasonable alternatives’;
 - present an appraisal of **current proposals**, i.e. the Draft Plan; and
 - explain **next steps**.
- 1.2.4 The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.3 This SA Report

- 1.3.1 The current consultation is on the final draft (‘proposed submission’) version of the plan. It is held under Regulation 19 of the Local Planning Regulations and follows a consultation in early 2025 on an early draft version of the plan under Regulation 18.
- 1.3.2 As such, this is the formal SA Report and supersedes the previous report.

Structure of this report

- 1.3.3 This SA Report is structured in three parts covering “work to date”, “an appraisal of the current proposals”, and “next steps”.
- 1.3.4 Ahead of Part 1, there is a need for two further introductory sections:
 - Section 2 – introduces the plan scope.
 - Section 3 – introduces the SA scope.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2024). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘proposed submission’ plan.

2. The plan scope

2.1 Introduction

- 2.1.1 The aim here is to briefly introduce the context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion below); the plan period; and the objectives that are in place to guide plan preparation.

2.2 Context to plan preparation

- 2.2.1 Rugby Borough Council (RBC) began preparing a new Local Plan in **2022**, following adoption of the current Local Plan in 2019 and in the context of a requirement to review local plans every five years. An 'Issues and Options' consultation was held in **2023** followed by consultation on an early draft version of the plan in early **2025**.
- 2.2.2 Work in 2023 was undertaken in the context of the 2021 NPPF and a draft new NPPF that was then adopted in December 2023. The current Government then adopted a new NPPF in December 2024, and a new draft NPPF is now anticipated in 2025.
- 2.2.3 Central to both the previous and new versions of the NPPF is a requirement for authorities to take a positive approach to development, with an up-to-date local plan that provides for development needs, including Local Housing Need (LHN), as far as is consistent with sustainable development.
- 2.2.4 The Borough's **LHN** is understood from the Government's standard method, which previously generated a figure of 525 dwellings per annum (dpa) and now – post December 2024 – generates a figure of 636 dpa. This is a modest increase compared to some other neighbouring areas, although Coventry now sees a reduced LHN.
- 2.2.5 Under the new NPPF there remains flexibility to evidence a **housing requirement** set below LHN, such that unmet need is generated, but there is a new emphasis on local plans providing for LHN in full, and also on collaborating with neighbouring authorities in respect of any unmet need. Rugby Borough can provide for its LHN in full, including recognising that the rate of delivery has been at or above the current LHN over recent years, and unmet need from elsewhere is a matter for ongoing consideration.
- 2.2.6 Also, a highly significant consideration for the Local Plan is providing for needs in respect of **employment land**, which are very high after having accounted for an established need for the Borough to make a significant contribution to needs that have been established for the region and sub-region through detailed work over recent years.
- 2.2.7 It is also important to be clear that there is an urgency in respect of providing for established developments needs through the Local Plan, in that ahead of a new Local Plan that provides for needs there is a risk of not being able to defend against speculative applications and, in turn, poorly located / uncoordinated growth.
- 2.2.8 To summarise the discussion so far, there is: A) 'top down' pressure to adopt a Local Plan given that the adopted Local Plan dates from 2019 and looks ahead only to 2031, whilst the NPPF expects plans to be reviewed every five years and look ahead 15 years (including in terms of providing for development needs); and B) 'bottom up' pressure in the sense of a need to ensure that growth comes forward in a plan-led way, i.e. such that the Borough can avoid potentially problematic 'planning by appeal'.
- 2.2.9 Finally, there is a need to adopt a Local Plan that delivers on **wide-ranging objectives** regardless of pressure from central government or concerns about avoiding planning by appeal (under the presumption in favour of sustainable development). For example:
- Providing for housing need is not only of great importance in-and-of itself, but also due to wide-ranging secondary benefits, for example in terms of affordable housing and supporting the local economy.

- Plan-led housing growth creates an opportunity to strategically target infrastructure investment such that the benefits of growth are realised in a way that far exceeds what can otherwise be achieved.
 - A local plan is an opportunity to consider development viability in a strategic way, such that a considered approach can be taken to policy 'asks' including housing mix, affordable housing, net zero development, biodiversity net gain, space standards, accessibility standards and more.
- 2.2.10 The Local Plan is also a key opportunity to ensure a strategic approach in respect of a range of other key issues, including providing for Gypsy and Traveller accommodation needs (which are significant), town centre regeneration (including accounting for changes to permitted development rights), and the design of new developments (including factoring in matters relating to space standards, accessibility standards, building energy performance and housing mix). These are all matters that have been a focus of plan-making and SA going back to the Issues and Options stage in 2023.

2.3 The plan area

- 2.3.1 The Borough of Rugby is located within the County of Warwickshire, at the eastern edge of the West Midlands, bordering the counties of Northamptonshire and Leicestershire within the East Midlands.
- 2.3.2 Around two thirds of the Borough's population lives within the town of Rugby, with the other settlements firmly classified as villages (the largest have a population of ~3,000). Coventry is then located adjacent to the west and is a major sub-regional centre in terms of employment, community facilities, retail and leisure; whilst the north of the Borough links closely to the towns of Nuneaton (Warwickshire) and Hinckley (Leicestershire). It should be noted that the intention is for Warwickshire to become a unitary authority (or potentially two unitaries) as part of local government reorganisation.
- 2.3.3 The Borough is very well-connected in transport terms, most notably by road but also by rail. Three motorways intersect the Borough, plus the M1 runs adjacent to the east. There is good motorway connectivity to Coventry to the west (and Birmingham beyond), Leicester to the northeast, and Northampton to the southeast (and Milton Keynes beyond). However, the far south of the Borough is a less well-connected rural area (between Rugby and Daventry), and the central north area is also less well-connected (noting the lack of an M6 junction between Rugby and Coventry).
- 2.3.4 With regards to rail connectivity, Rugby is the only station within the Borough, but from here there are very good services to Coventry / Birmingham, Northampton and Milton Keynes / London. Also, a new Rugby Parkway Station is proposed for the southeast edge of the town (south of Houlton).
- 2.3.5 The adopted Local Plan (2019) directed the great majority of growth to Rugby town – see Figures 2.1 and 2.2 – although there was also modest growth directed to select 'main rural settlements'. Seven out of the nine main rural settlements are located within the West Midlands Green Belt (all bar Clifton upon Dunsmore and Dunchuch) but there were judged to be "exceptional circumstances" to justify limited Green Belt release.
- 2.3.6 Taking the **committed Rugby strategic urban extensions** in turn:
- Houlton – to the southeast was allocated in the Core Strategy (2011) as 'Rugby Radio Station' and this allocation was taken forward into the adopted Local Plan (2019), by which time the site was under construction. Total capacity is ~6,000 homes (~1,300 now occupied) plus there is an employment area and new extensive infrastructure including a secondary school (opened in 2021). However, viability challenges have greatly limited potential to deliver affordable housing.
 - Southwest Rugby – was the primary new allocation proposed by the adopted Local Plan (2019), with the plan supporting ~5,000 homes in total across 12 sites (land ownership parcels), plus major new employment land, road infrastructure (a 'Spine Road Network') and wider infrastructure including a secondary school.

A Supplementary Planning Document (SPD) was adopted in 2021 but was then updated in 2024 to reflect latest understanding of infrastructure costs and related delivery challenges. Employment land has now come forward at the southern edge of the site (adjacent to the M45 Junction), but the majority of the site remains unpermitted (although applications are being progressed, as discussed [here](#)).

- Eden Park (Rugby Gateway) – to the northwest was permitted and underway by the time of the Local Plan’s adoption, following a Core Strategy allocation. The extensive employment land element adjacent to the M6 junction delivered early, and the residential elements are coming forward in phases. Alongside 1,300 homes the scheme will deliver a primary school and a community hub.
- Coton Park East – to the northeast was allocated through the adopted Local Plan (2019) for 800 homes, a smaller employment area and a flexible school site (at least a 1fe primary; at most an all through school). Also, the plan explains that the site “... presents the opportunity to extend the existing Coton Park area, providing further housing and employment development. Houses have been built in this area for over 10 years and this final extension... will assist with achieving short term housing supply targets as well as steady delivery in the midterm.” An SPD was then adopted which discussed, amongst other things, new bus and cycle routes, and a small part of the residential has now delivered. However, the land owner is now seeking to bring forward the remainder of the site for employment land.

2.3.7 The next matter for consideration, by way of orientation, is the location of strategic employment sites, which are shown in Figure 2.3. The figure is taken from the Issues and Options consultation document (2023) and additionally shows potential broad areas to explore for new employment land allocations, typically adjacent to existing sites.

2.3.8 Taking the locations highlighted by Figure 2.3 in turn:

- Southeast Coventry – this is a key cross border strategic employment area shared with both Coventry City Council and Warwick District Council. In particular, it should be noted that the South Warwickshire Local Plan Preferred Options consultation document (2025) identifies a large Major Investment Site, to include a new Gigafactory on the current airport site. Within Rugby Borough, Prologis Park near Ryton-on-Dunsmore is a major employment area (primarily though not solely for ‘logistics’) that has delivered over recent years, and there is a case for expansion as part of a coordinated strategy and subject to wide-ranging factors including constraints relating to transport, Green Belt and the River Avon.
- East Coventry – this area is not currently well-connected in transport terms but there is a pending Development Consent Order (DCO) for a new strategic junction onto the A46. There are also significant constraints (over-and-above Green Belt) relating to Coombe Abbey. The proposal here, known as Walsgrave Hill, would involve a large employment area to the north of Coombe Country Park stretching north to the motorway junction at the NE edge of Coventry. It was discussed as a notable omission site within the Rugby Local Plan Inspector’s Report (2019).
- NE Coventry – this is a key area given the M6 / M69 junction. The sector to the southwest falls within Coventry and is a long-standing employment area, whilst the sector to the northwest falls within Rugby Borough but has not been promoted as available, potentially reflecting more challenging connectivity. To the northeast a major new site was recently [permitted](#) by RBC (Crown Fields Farm); and to the southeast is Ansty Park – a major manufacturing and research and development (R&D) centre that has developed over recent years, and where expansion is an option – as well as the aforementioned Walsgrave Hill site.
- South of Hinckley – employment land at the southern edge of Hinckley (north of the A5) is long-standing, and then a logistics centre was recently delivered to the east of the M69 / A5 junction (in Hinckley and Bosworth Borough). The majority of land in this area is available for development, either for employment or a new settlement, but this is potentially not a sequentially preferable location for growth, and there are constraints/challenges including sensitive Green Belt.

- Magna Park – is a long-standing and very large-scale logistics centre located adjacent to the east of the Borough, within Harborough District. The Park is in the process of expanding to around double its historic extent, with all development within Harborough District. Virtually all land immediately adjacent to Magna Park within Rugby Borough is being promoted for employment development, but the Coventry Green Belt constrains part of this land. Expansion within the Borough was not flagged as a foremost option at the Issues and Options stage (2023).
- North Rugby – northwest Rugby is a long-standing large industrial area, and then land to the north of Rugby, adjacent to M6 J1, has been developed for strategic logistics uses over recent years. As discussed above, whilst Coton Part East is a strategic residential-led allocation in the adopted Local Plan (2019), the landowner is now seeking a new allocation focused on employment land. A new NW Rugby strategic urban extension is also being promoted, which could deliver significant employment land, although this is Green Belt and there are wider challenges.
- East Rugby – Daventry International Freight Terminal (DIRFT) was delivered in the 1990s and then DIRFTII was permitted in 2005, which involved a ~50% expansion, followed by DIRFTIII permitted in 2014 and now nearing completion, whilst DIRFT IV is now proposed. All of DIRFT is within West Northamptonshire, but adjacent to Rugby Borough, and closely linked to the new community at Houlton (discussed above). A major new employment area is also being promoted to the north of Houlton (see Figure 2.3), but this would be separated from Houlton by a flood plain and there is a need to consider the in combination impacts of growth on A5.
- SW Rugby – as discussed above, a major new employment area (Symmetry Park) is now nearing completion as the first phase of the committed SW Rugby strategic urban extension. Also, the adopted Local Plan identified land adjacent to the north of Symmetry Park as a reserve site, such that now supporting its allocation through the new Local Plan is a clear option to explore, including as it would help to fund the new infrastructure needed to realise the SW Rugby vision in full. Furthermore, the majority of land to the south, in the vicinity of the junctions onto the strategic road network, is being promoted for employment land.

2.3.9 This discussion has sought to introduce the plan area with reference to existing, recent and committed development sites and strategic employment areas (where expansion is almost invariably an option). However, there are, of course, numerous wider strategic spatial issues and opportunities that are important for orientation. These are a focus of discussion in subsequent sections of this report, but key points to note here are:

- Rugby town centre – must be a focus of the new Local Plan, as was recognised at the Issues and Options stage, including recognising changes to the context surrounding planning for town centres. A Rugby Regeneration Strategy was published in 2022, and delivering new homes is one priority.
- Landscape and green / blue infrastructure (GBI) – detailed work has also been completed to understand varying landscape character and sensitivity, as discussed further below. Also, the adopted Local Plan includes a GBI policy map that highlights priority areas including an extensive area to the east / south east of Coventry and numerous river corridors (with a concentration at Rugby town).
- Green Belt – a two stage Green Belt Assessment (GBA) has recently been completed with a particular focus on identifying ‘grey belt’. The Stage 1 assessment identifies large swathes of the rural area as provisional grey belt, whilst land adjacent or in proximity to a main settlement requires detailed consideration before identifying any provisional grey belt, which is the focus of Stage 2.
- Strategic Transport Assessment – this is another recent evidence study. It models various growth scenarios, accounting for modal shift and mitigation assumptions, and so is inevitably complex, but here the following identified “sensitive locations” can be noted: 1) A5/A426/Gibbet Hill Roundabout; 2) A426/A4071 Avon Mill/Hunters Lane (an improvement scheme is proposed); 3) A426/Boughton Road Roundabout; 4) Rugby Gyrratory; and 5) A45/A46 Toll Bar End junction.

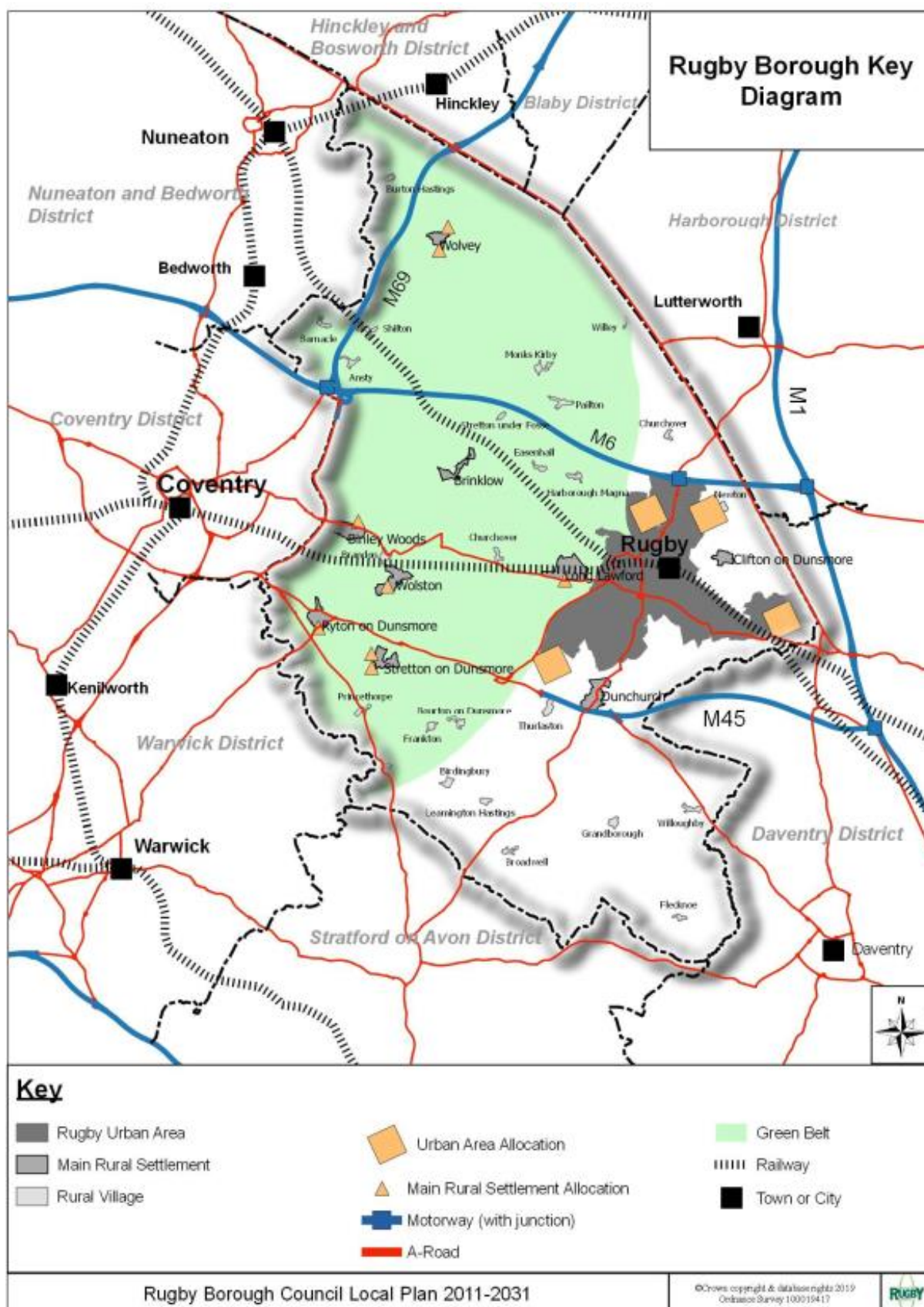
Figure 2.1: The adopted Local Plan Key Diagram

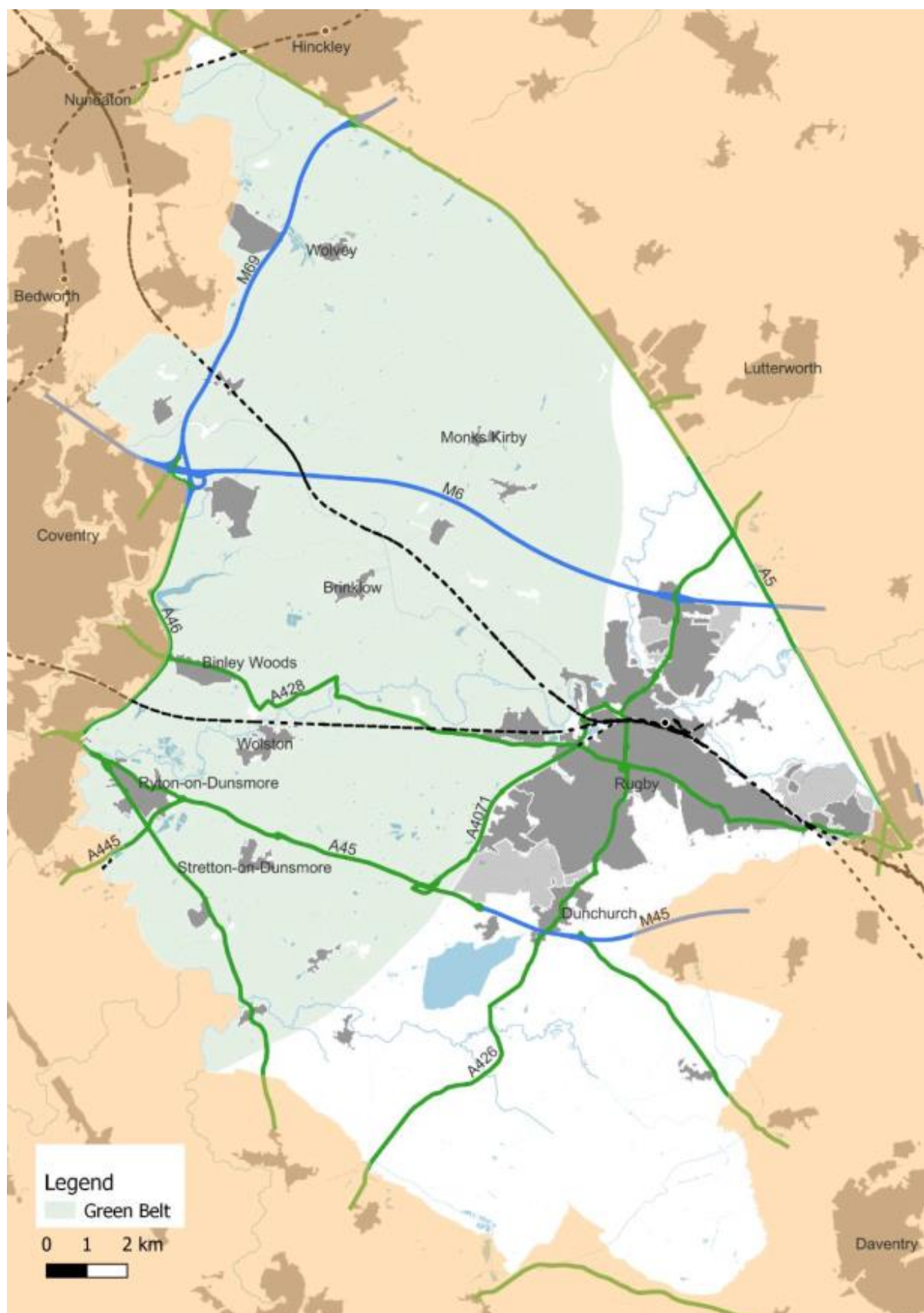
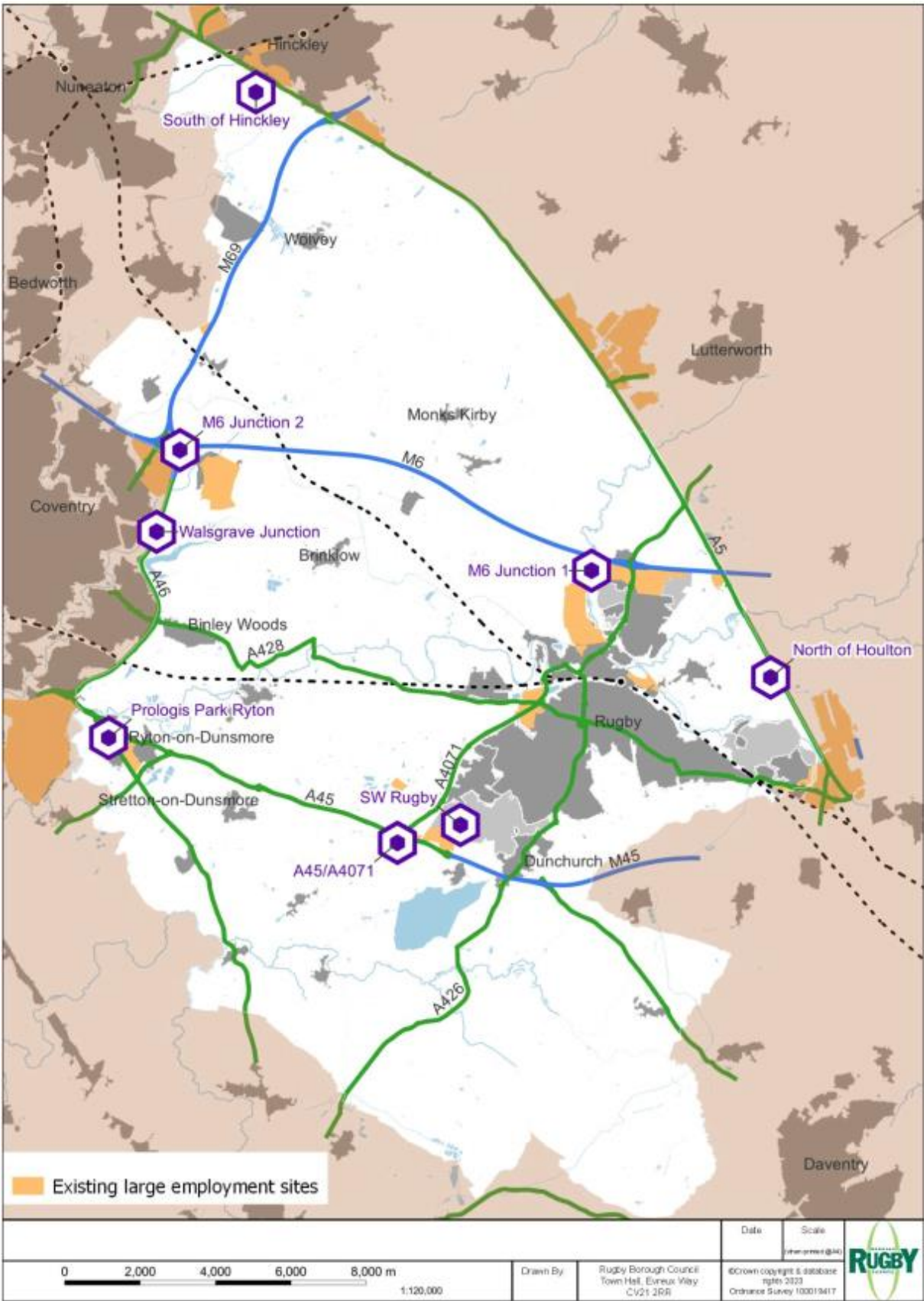
Figure 2.2: A figure from the I+Os document showing committed strategic urban extensions

Figure 2.3: Existing employment areas and employment growth options (from the I+Os stage)



2.4 The plan period

2.4.1 The plan period is 2025 to 2042, in light of NPPF paragraph 22 which states:

“Local plans] should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead...”

2.4.2 With regards to the start of the plan period ('base date'), whilst there can be an argument for setting a base date at the start of the plan-making process and then applying this as a 'firm footing' for all subsequent work, it is increasingly seen as good practice to set a base date as close as possible to the point of plan finalisation. For example, an Inspector's Letter relating to the North Norfolk Local Plan Examination (dated 24 May 2024) stated: *“Turning to the base date of the plan, this should correspond to the date from which the housing needs of the district are quantified. As set out in paragraph 12 below, this should be April 2024.”* In some instances it can be argued that an earlier base date is necessary to account for poor housing delivery in the years prior to adoption of a new local plan, but this is not a relevant consideration for Rugby Borough. Also, and in any case, the Government's standard method for calculating housing need accounts for past delivery through an affordability uplift.

2.4.3 With regards to the plan end date, whilst at the Regulation 18 Draft Plan proposed to plan to 2045 as a proactive approach particularly mindful that the West Midlands Strategic Employment Sites Study (WMSESS; 2024) provides evidence for future development needs to 2045 and 2050, the proposal now is to plan to 2042. This is in line with NPPF paragraph 22 (see above) in that there is limited case for identifying “larger scale developments such as new settlements or significant extensions...” through the new local plan. However, it is acknowledged that there do remain options for 'strategic growth locations' of this nature that warrant consideration for potential inclusion in the plan. This is a matter that is a focus of discussion below.²

2.4.4 Finally, an important point to note here is that, as of the start of the plan period (1st April 2025) there was known to be 8,843 homes supply from 'commitments', which comprises sites with planning permission or an existing allocation that can likely be rolled forward into the new Local Plan (albeit there is always a need for proportionate work to confirm that this is the case, as there is feasibly the potential to remove support for an allocation). Within this figure, around 6,500 homes are committed across two strategic urban extensions to Rugby, namely South West Rugby and Houlton (and focusing only on supply to 2042, recognising that both sites are set to still be delivering post 2042). There is also a very significant amount of committed employment land.

2.4.5 As such, a key aim for the local plan is to identify housing and employment land supply over-and-above commitments (also a windfall assumption for housing)³ sufficient to deliver on the identified needs / requirements (where the distinction is a matter that has been introduced above and is discussed below). A further important consideration is then identifying supply to meet Gypsy and Traveller accommodation needs.

² A further argument for a shorter plan period relates to impending local government review (LGR), in that decisions about longer-term growth in Rugby Borough might be better taken by a successor unitary authority post LGR, informed by the new spatial development strategies introduced under the Planning and Infrastructure Bill 2025.

³ The windfall assumption is the assumed level of supply from sites not allocated in the Local Plan, which in Rugby Borough means sites of fewer than 5 homes, typically in urban areas.

2.5 Plan objectives

2.5.1 It is important to set objectives to guide the plan-making process. Also, plan objectives are a key input to the SA process, because ‘reasonable alternatives’ must be defined taking account of “the objectives... of the plan.” The plan objectives are as follows:

- Support the diversification and growth in sustainable locations of Rugby Borough’s economy in line with the Economic Strategy
- Support the revival of Rugby town centre
- Reduce emissions and adapt to climate change
- Raise design standards
- Deliver infrastructure-led growth
- Facilitate a greener, more biodiverse borough

3. The SA scope

3.1 Introduction

3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) nor the scope of reasonable alternatives (discussed in Part 1).

3.1.2 The aim here is to introduce the reader to the broad scope of the SA. Further information is presented in a Scoping Report that was published for consultation in 2023; however, it is important for the SA scope to remain flexible, responding to the emerging plan / reasonable alternatives and latest evidence. The SA scope – i.e. understanding of key sustainability issues and objectives, in light of contextual factors and baseline trends – is discussed within the appraisal sections below as appropriate.

Consultation on the scope

3.1.3 The regulatory requirement is that: *“When deciding on the scope and level of detail of the information that must be included in the [SA Report], the responsible authority shall consult the consultation bodies.”* As such, the consultation bodies – the Environment Agency, Historic England and Natural England – were consulted on the SA scope in 2023 (at the time of the Issues and Options consultation). All three consultation bodies provided comments, which are referenced within the appraisal sections below.

The SA framework

3.1.4 The outcome of scoping work in 2023 was an SA ‘framework’ comprising 24 objectives grouped under 18 topics. The aim of an SA framework is to ensure suitably focused and concise appraisal, and, in this light, in early 2025 (ahead of the Draft Local Plan consultation) it was considered appropriate to make some adjustments to the framework.⁴ The SA framework is unchanged at the current time – see Table 3.1.

⁴ Specifically, whilst no objectives were deleted, several were edited, and it was considered appropriate to group the objectives under 13 topic headings, with a view to ensuring an appraisal that is suitably structured, in terms of balancing a need to be both: A) systematic; and B) concise and accessible, with minimal repetition of points or discussion of ‘non-issues’. Table 3.1 within the Interim SA Report published alongside the Draft Local Plan in early 2025 explained the changes that had been made to the framework, but there is no need to represent that information at the current time.

Table 3.1: The SA framework

Topic	Objective
Accessibility (to community infrastructure)	• Ensure good access to schools and other services / facilities • Improve the quality and accessibility of leisure opportunities • Protect and enhance the quality of public areas and green spaces
Air quality	• Reduce air pollution and ensure air quality continues to improve
Biodiversity	• Conserve and enhance biodiversity
Climate change mitigation	• Address climate change by reducing greenhouse gas emissions • Increase energy efficiency and the proportion of energy generated from renewable sources
Climate change adaptation	• Reduce the risk of flooding and the resulting detriment to public well-being, the economy, and the environment • Address wider climate change impacts including overheating
Communities, health and well-being	• Improve health and wellbeing • Reduce poverty and social exclusion • Provide opportunities for interaction • Reduce crime and disorder • Ensure the vitality and viability of Rugby town centre
Economy and employment	• Increase investment in Rugby's economy including to facilitate sustainable regeneration • Ensure high and stable levels of employment so all can benefit from economic growth • Provide opportunities for residents to work locally in line with 'sustainable transport' objectives • Ensure the vitality and viability of Rugby town centre
Historic environment	• Protect and enhance the historic environment
Homes	• Ensure that everyone has the opportunity to live in a decent and affordable home
Landscape and townscape	• Protect and enhance the countryside, particularly valued landscapes • Ensure a high quality townscape incorporating good design principles for buildings and surrounding spaces
Resources	• Protect productive agricultural land • Improve efficiency in land use through the re-use of previously developed land and existing buildings • Support sustainable resource consumption and waste management
Transport	• Reduce the need to travel and reduce the effects of traffic on communities • Facilitate modal shift away from use of the private car to other forms of travel including walking, cycling and public transport
Water	• Maintain and improve water resources and water quality, including accounting for wastewater treatment

Part 1: Work to date

4. Introducing Part 1

4.1 Overview

4.1.1 As discussed, work has been under way since 2022. However, the aim here is not to relay the entire backstory, nor to provide an ‘audit trail’ of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2025 ahead of the current Regulation 19 publication stage. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with – see **Section 5**
- present an appraisal of the reasonable alternatives – see **Section 6**
- explain the Council’s reasons for selecting the preferred option – see **Section 7**

4.1.2 Presenting this information aligns with the requirement to report an appraisal of reasonable alternatives and “an outline of the reasons for selecting the alternatives...”

4.2 Reasonable alternatives in relation to what?

4.2.1 The requirement is to examine reasonable alternatives (RAs) taking account of “the objectives and geographical scope of the plan”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites**, to provide for objectively assessed needs alongside delivering on wider plan objectives. Establishing a spatial strategy is invariably a central objective of any local plan.⁵

4.2.2 Given the objectives of any local plan, spatial strategy alternatives can perhaps more accurately be described as **alternative key diagrams**, where the key diagram is a reflection of established development requirements, spatial strategy and site selection. Alternative key diagrams can then be termed ‘**growth scenarios**’ as a shorthand.

4.2.3 In short, a focus on reasonable alternatives (RAs) in the form of ‘growth scenarios’ ensures a focus on mutually exclusive alternatives that go to the heart of the local plan.⁶

4.2.4 Housing and employment land are key matters to explore across growth scenarios, and providing for Gypsy and Traveller accommodation needs is a further consideration.

What about site options?

4.2.5 Whilst individual site options clearly generate interest, they are not RAs in the context of most local plans. Were the objective to allocate one site, then site options would be RAs, but that is rarely the case for local plans. Rather, the objective is to allocate a package of sites and so RAs must be in the form of alternative packages of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining RA growth scenarios (Sections 5.3 & 5.4).

What about other aspects of the plan?

4.2.6 As well as establishing a spatial strategy, allocating sites etc, the plan also seeks to establish thematic policies as well as site-specific policies. These can be broadly described as development management (DM) policies. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified following discussion with Officers. DM policies are discussed further in Part 2.

⁵ Another consideration is that to be ‘reasonable’ alternatives must be meaningfully different to the extent that they vary in terms of **significant effects**, where significance is defined in the context of the plan (taken as a whole). A focus on key diagram RAs (‘growth scenarios’) guarantees that this will be the case and so negates the need for a process of screening what should and should not then be a focus of subsequent work to explore (i.e. define, appraise and consult upon) RAs. It is also important to note that appraising a draft proposal versus the ‘do nothing’ option does not equate to an appraisal of RAs, because do nothing is the baseline and there is a separate requirement, as part of the SA process, to appraise the draft plan against the baseline.

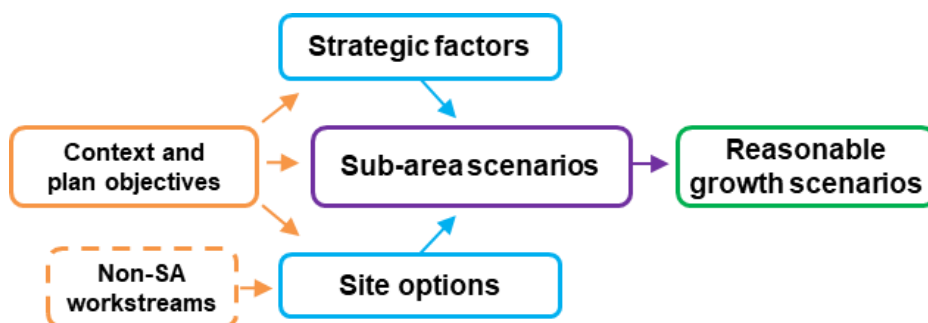
⁶ This is important in light of the regulatory requirement, when read at face value, suggests a need to appraise and consult upon alternative plans; specifically, the requirement is to appraise and consult upon: “... the plan and reasonable alternatives”.

5. Defining growth scenarios

5.1 Introduction

- 5.1.1 The aim here is to discuss the process that led to the definition of reasonable alternatives (RAs) in the form of growth scenarios in 2025.

Figure 5.1: A standard broad process to define RA growth scenarios



- 5.1.2 This process is described across the following sub-sections:

- Section 5.2 – considers strategic factors ('top down').
- Section 5.3 – considers individual site options ('bottom up').
- Section 5.4 – draws upon the preceding two sections to consider growth options/scenarios for individual sub-areas within the Borough in turn.
- Section 5.5 – combines sub-area scenarios to form RA growth scenarios.

A note on limitations

- 5.1.3 This section does not present an appraisal of reasonable alternatives but rather describes the process that led to the definition of reasonable alternatives. The work reported here is a means to an end (reasonable alternatives) which, in turn, has a bearing on the extent of work that is proportionate, also recalling the legal requirement, which is to present an “**outline** of the reasons for selecting alternatives...” [emphasis]

5.2 Strategic factors

Introduction

- 5.2.1 The aim of this section is to explore strategic factors (issues and options) with a bearing on the definition of RA growth scenarios. Specifically, this section of the report explores:

- Quantum – how much development is needed (regardless of capacity)?
- Broad spatial strategy – broadly where is more/less suited to growth; also, what growth typologies are supported, e.g. large ('strategic') sites versus smaller sites?

Quantum

- 5.2.2 This section sets out understanding of development needs in respect of housing, employment land and Gypsy and Traveller accommodation in turn. In each case, in addition to setting out understanding of objectively assessed need (NPPF para 11), the aim is to also explore high level arguments for the Local Plan providing for a quantum of growth either above or below objectively assessed need.

Housing

- 5.2.3 A central tenet of local plan-making is the need to **A)** objectively establish housing needs ('policy-off'); and then **B)** develop a response to those needs through the local plan ('policy-on'). [Guidance](#) explains: *"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement..."*
- 5.2.4 With regard to (A), the NPPF states that local housing need (LHN) should be established via an assessment "conducted using the standard method". With regard to (B), most local authorities respond to LHN by setting a housing requirement that equates precisely to LHN; however, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.
- 5.2.5 For Rugby Borough the Government's standard methodology establishes an **LHN** figure of 636 dwellings per annum (dpa), or 10,812 homes in total over the plan period.
- 5.2.6 There is little question of setting the housing requirement at a figure **below LHN** (i.e. not providing for LHN in full, leading to unmet need), given the relatively limited nature of constraints affecting the Borough, including accounting for the new designation of grey belt that is discussed further below. Also, it is important to note that the Borough has been delivering housing at a rate at or above LHN over recent years.
- 5.2.7 With regard to a housing requirement set **above LHN**, NPPF para 67 explains: *"The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment."*
- 5.2.8 With regard to unmet need, this is an ongoing consideration, recognising that the adopted Local Plan (2019) makes provision for unmet need from Coventry.⁷ However, the emerging Coventry Local Plan is expected to make provision for LHN in full,⁸ and there is little risk of unmet need from elsewhere.⁹
- 5.2.9 With regard to the possibility of a housing requirement set above LHN on the basis of "growth ambitions...", this is not considered to be a significant consideration. Whilst the delivering a high employment growth strategy is a clear option for the Local Plan, support for any such option would not necessarily suggest a need for commensurately high housing growth, because the aim of the high employment growth strategy would be in part to provide for needs arising *sub-regionally*. Specifically, the 'Homes – Jobs Alignment Paper' (2025) produced on behalf of Coventry and Warwickshire local authorities demonstrates that: A) the key geography for considering the balance of new housing and new employment land is Coventry and Warwickshire; and that B) assuming employment land needs are met within this sub-region then there will be comfortably sufficient housing growth to provide for the necessary workforce. The Paper concludes:

⁷ Policy DS1 explains that the requirement is 12,400 homes *"including 2,800... to contribute to Coventry's unmet needs."*

⁸ The submission version of the Coventry Local Plan (2025) states: *"The Local Housing Need for Coventry for the period 2021-2041 is therefore 29,100 (1,455 per annum) and this will be delivered fully within Coventry's administrative area."* It then goes on clearly to state that the housing requirement is 29,100 homes and that the total identified supply is 31,954 homes (i.e. there is a healthy 'supply buffer'). Furthermore, subsequent to the plan being finalised (in late 2024) the Government published the new standard method, which assigns Coventry a lower housing need figure of 1,388 homes per annum.

⁹ The Leicester Local Plan is nearing adoption and generates very significant unmet need, but a preferred broad approach to addressing this unmet need has been agreed amongst the Leicestershire local authorities. No requests have been received in respect of providing for unmet housing need from Leicester. It is noted that the Leicester Local Plan looks only to 2036, such that there will likely be further unmet need to be dealt with in the near future (following a plan that looks further ahead, e.g. to 2045) and, as part of this, there could be pressure for growth in the vicinity of Hinckley, which links closely to Rugby Borough. However, there is also a need to factor in the context of Local Government Reorganisation (LGR) and Devolution.

Aside from Leicester, it is recognised that there are major challenges dealing with unmet housing need arising from Greater Birmingham, but attention focuses within an established housing market area that does not include Coventry or Rugby. The Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA; 2022) was clear that: *"Both Stratford-on-Avon and North Warwickshire districts sits across the Coventry & Warwickshire and Greater Birmingham Housing Market Areas. These authorities will therefore need to consider unmet needs from Birmingham in setting housing targets within their respective local plans alongside any unmet needs from within the Coventry & Warwickshire HMA."*

“Considering the sensitivity analyses undertaken, there is sufficient workforce available to support the jobs growth envisaged even with no growth in in-commuting and no changes in economic participation.

Drawing the evidence together, the evidence points to a broad alignment between homes and jobs within the sub-region; but with the potential for growth in economic participation over the coming decades to support some additional employment growth. The latter essentially represents a degree of potential labour supply flexibility.

Overall, the evidence points to no need to plan for housing provision above the standard method within the HMA.”

5.2.10 Two final high level considerations with a bearing on the question of whether there is a need to explore ‘higher growth’ scenarios at this stage are as follows:

- Affordable housing need – is quite high as a proportion of LHN, such that a housing requirement set at LHN would not provide for affordable housing need in full (recognising that affordable housing is delivered by market led housing schemes at a rate limited by development viability), and it can also be noted that Coventry’s affordable housing need is very high as a proportion of LHN.¹⁰ Specifically, the Updated Housing Needs Evidence for Rugby Borough (2025) identifies a net need for affordable housing of 338 homes p.a., although if those already housed are excluded this reduces to 202 homes p.a., which is equivalent to 32% of the standard method LHN figure (636 per year). The study also notably concludes:

“The analysis has taken account of local housing costs... along with estimates of household income. The evidence indicates that there is an acute need for affordable housing... The majority of need is from households who are unable to buy OR rent and therefore points particularly towards a larger and more acute need for rented affordable housing than for affordable home ownership.”

The Government’s Planning Practice Guidance (PPG) states that a boost to the housing requirement “*may need to be considered where it could help deliver the required number of affordable homes*”. However, boosting a housing requirement in order to provide more fully for affordable housing need is a complex matter (see further discussion within the Development Needs Topic Paper, 2025).

As a final point, it can be noted that a previous study, namely the Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA; 2022) did not suggest a need to boost the housing requirement in Rugby Borough:

“In setting housing [requirements] in individual local plans, the affordable housing evidence is also relevant. In the northern part of the sub-region in particular – in North Warwickshire and Nuneaton and Bedworth – this supports the case for considering [a housing requirement > LHN] in order to boost... affordable housing.”

- Recent rates of delivery – over the past 10 and 20 year periods Rugby Borough’s housing stock has grown at a rate significantly above the average for the West Midlands and for England as a consequence of past policy decisions, particularly the identification of Rugby in the 2008 Regional Spatial Strategy for the West Midlands as a “sub-regional focus”. High rates of recent growth do serve as an indication that the market could potentially deliver high growth scenario (e.g. compared to many parts of the country where standard method LHN is far in excess of recent rates of housing delivery). However, there is no reason to suggest that the past policy position from 2008 remains extant and, in absence of a strategic policy position regarding Rugby as a growth location, there is little reason to suggest that recent high growth indicates a case for continued high growth.

¹⁰ For context, the Proposed Submission Coventry Local Plan (2024) requires affordable housing at a rate of 25%, and Policy DS2 (The Duty to Co-operate and partnership working) states: “*In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city’s wider housing needs being met.*”

Employment land

- 5.2.11 As an initial point, attention can focus on industrial land, as whilst there is a need for additional office space (including R&D space) over the plan period, this is quite modest and is set to be comfortably met by new supply from sites that are already committed (specifically, sites with planning permission).
- 5.2.12 Focusing on industrial land, there is a distinction between:
- Need for industrial land on smaller sites – comprising land within use classes E(g)(iii) (industrial processes which can be carried out in a residential area without detriment to amenity), B2 (general industrial) and B8 (storage and distribution) which is delivered on sites of less than 25 hectares in area. This need is calculated based on past completion trends for Rugby Borough and was originally calculated in the HEDNA before being updated through the Alignment Paper to take account of additional more recent completions trend data. The Alignment Paper calls industrial need on smaller sites “non-strategic” site need. To be clear, this category of need includes a need for large units that are built on smaller sites.
 - Need for industrial land on larger sites – this comprises floorspace for B2, B8 and classes E(g)(iii) uses that is constructed on sites of 25ha or more, which can be described as “strategic sites”. This need derives from the West Midlands Strategic Employment Sites Study 2024 (WMSESS), and specifically its apportionment of part of the regional need to opportunity area 7 (Figure 5.2).¹¹ This apportionment is based on factors including access to the strategic road network, an assessment of junctions, access to labour and occupier market insights.
- 5.2.13 Focusing on need for strategic sites, there is a strong case to suggest that the entire opportunity area 7 apportionment from the WMSESS should be provided for in Rugby Borough given: A) a clear lack of capacity in Coventry; B) only a small part of Warwick District is within the opportunity area, and this is already allocated for development through the Coventry Gateway and Coventry Airfield schemes; and C) Nuneaton and Bedworth’s Local Plan is at a very advanced stage.
- 5.2.14 Taking this into account, the Development Needs Topic Paper (2025) sets out that:
- The gross need for strategic sites is 791,525sqm (226ha) and for non-strategic sites is for 232,600sqm (58ha) such that total gross need is 1,024,125sqm or 284ha.
 - After existing committed supply the net need for strategic sites is 310,711sqm (89ha) and for non-strategic sites is for 219,171sqm (55ha) such that total net need is for 529,882sqm or **144ha**.
- 5.2.15 Two further considerations that suggest a need to remain open to higher growth are: A) the Coventry Local Plan is set to generate an unmet need for non-strategic sites of 9ha; and B) the above figures are to 2042, but the WMSESS looks to 2045 rather than 2042.

Gypsy and Traveller accommodation

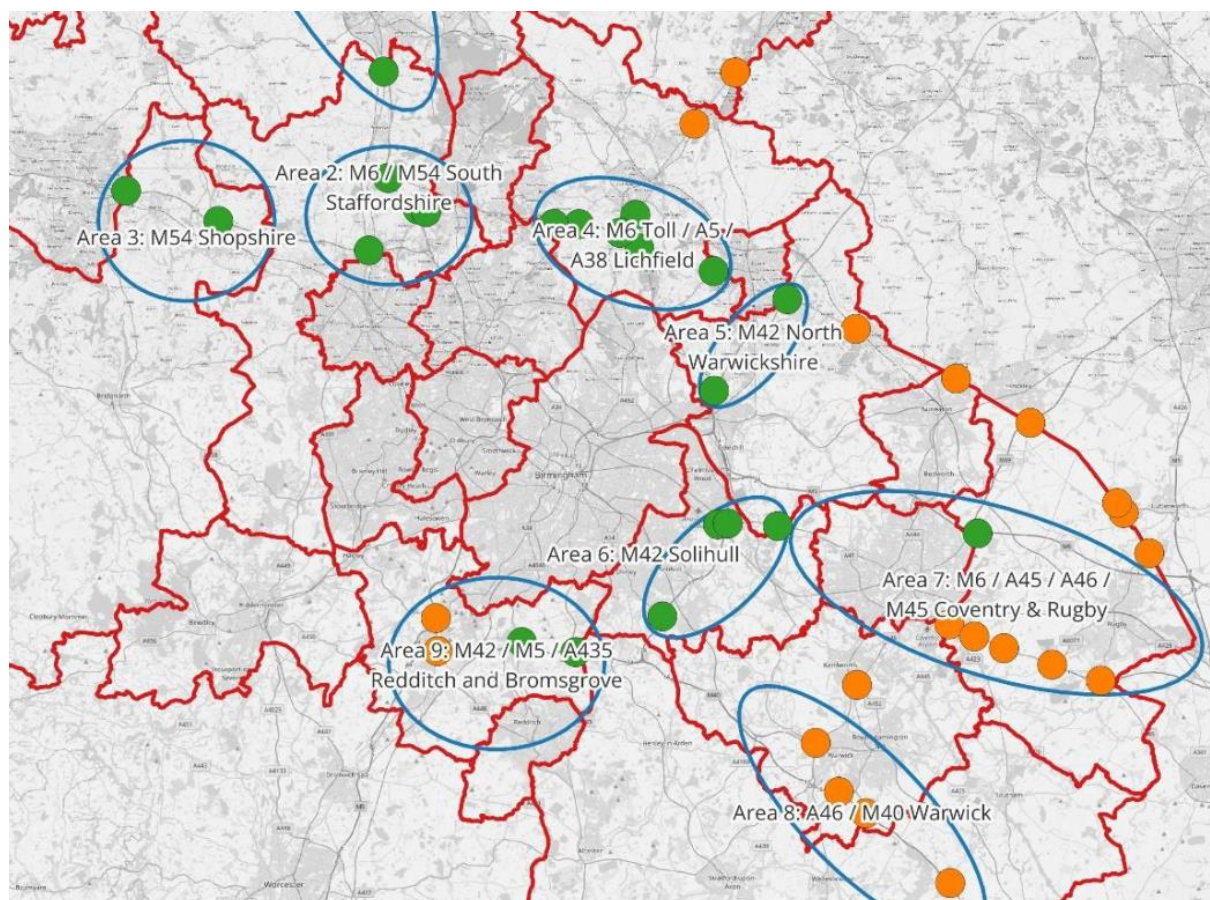
- 5.2.16 The Gypsy and Traveller Accommodation Assessment 2025 (GTAA) identifies a need for 94 pitches (1 April 2024 to 31 March 2042), but since completion of the assessment, planning permission has been granted for 14 further pitches. Also, the GTAA identifies the potential for household dissolution to provide a supply of 9 pitches. As such, there is a residual need for 71 pitches, which is significant.
- 5.2.17 The Local Plan must seek to proactively identify a supply of land to provide for this need; however, there is also the potential to set suitably permissive development management policy aimed at supporting supply from well located windfall sites over the plan period, plus there will be the potential to boost supply through local plan reviews.

¹¹ The WMSESS was preceded by the Coventry and Warwickshire HEDNA in 2022 and then followed by a Coventry and Warwickshire Alignment Paper in November 2024, which considered implications of the WMSESS for the sub-region.

Conclusion on growth quanta

- 5.2.18 Beginning with housing, the strategic case for formally exploring growth scenarios that would involve a housing requirement set above LHN is overall not strong. At the Draft Plan stage earlier in 2025 the proposal was to set the housing requirement at LHN and there were limited strong arguments made for higher growth through the consultation. However, it is nonetheless prudent to test the possibility of higher growth, including recognising that the proposal is now to plan for a reduced plan period (to 2042). A lengthened plan period (e.g. 2045 as per the proposal at the Draft Plan stage) would result in an increase to housing need (e.g. three additional years would mean a need for 1,908 additional homes) and so there would be a need for commensurate additional supply in order ensure that the housing requirement can be set at LHN.
- 5.2.19 With regard to employment land (industrial land) there is a clear case for providing for the need figure discussed above which includes a significant contribution to sub-regional needs (N.B. this is a residual figure after having accounted for existing supply from completions and commitments). This is a high growth strategy, but it is in line with the proposed approach from the Draft Plan stage, which was broadly well received. There is limited strategic case for significantly lower or higher growth scenarios.
- 5.2.20 Finally, the Local Plan must also take steps to proactively identify new supply of Gypsy and Traveller pitches, although there is also the potential to assume some supply from windfall sites, assuming suitably permissive development management policy.
- 5.2.21 The question of growth quanta to reflect across the RA growth scenarios is returned to within Section 5.5 after having considered spatial strategy and supply options.

Figure 5.2: Strategic employment site opportunity areas (also two categories of SRN junctions)



Broad spatial strategy

5.2.22 The aim of this section is to explore ‘broad spatial strategy’ issues, opportunities and options, building upon the introductory discussion presented in Section 2. It is important to re-emphasise that this amounts to an early high level discussion.

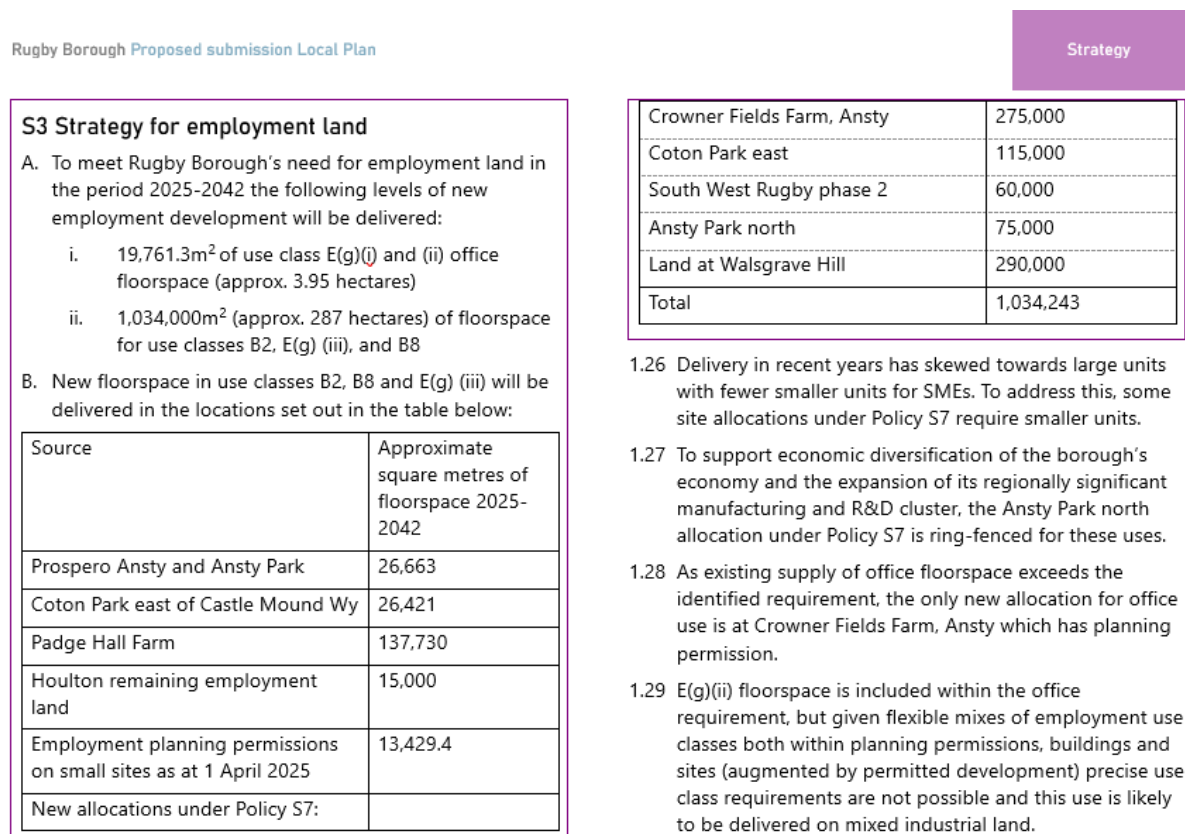
5.2.23 This sections considers:

- Employment land
- Housing
- Gypsies and Travellers pitches

Employment land

5.2.24 The situation is complex, and so the most straightforward approach is to introduce the proposed strategy at the current time and then consider high-level arguments for potentially taking an alternative approach. Figure 5.3 shows the proposed strategy.

Figure 5.3: The current proposed employment land strategy



5.2.25 An initial point to note is that the total proposed supply to 2042 exceeds total need to 2042 – accounting for both ‘local need’ for non-strategic sites and an apportionment of ‘larger than local’ need for strategic sites – by 10,118sqm. Within this total supply it is understood that needs can be met for both non-strategic sites and strategic sites.

5.2.26 Planning for the local need plus the larger than local need for strategic sites represents a high growth strategy, whilst 10,118sqm represents a healthy ‘supply buffer’ and/or this figure could be considered as making a contribution to unmet need from Coventry.

5.2.27 There is little strategic case for questioning the preferred approach of: **A)** planning to 2042 rather than to 2045; **B)** seeking to provide for the full area 7 strategic need to 2042; and **C)** not seeking to provide for unmet need from Coventry in full (recognising that other authorities in the sub-region are also well placed to contribute).

- 5.2.28 Next there is a need to consider the distribution of strategic employment site allocations to deliver on the full area 7 strategic need.
- 5.2.29 The WMSESS recommended that provision for strategic sites in area 7 should include: A) 2-3 larger B8/mixed sites of circa 50ha; and B) 1-2 smaller B1/B2 sites.¹²
- 5.2.30 With regards to (A), the proposed supply (Figure 5.3) involves three sites of 50+ hectares in area 7, namely Padge Hall Farm, Crowner Fields Farm and Walsgrave Hill such that the recommendation is set to be met. Taking the sites in turn:
- **Padge Hall Farm** – is a cross-border permitted site located in the far northwest of the Borough, linking closely to Hinckley and Nuneaton. There is detailed permission for 55,740sqm B8 and outline permission for 80,610sqm B8 or B2.
 - **Crowner Field Farm, Ansty** – is located to the north east of M6 J2 and to the north of Ansty Park. It has permission for the creation of an employment-led headquarters campus, and the applicant was Frasers Group plc.
 - **Walsgrave Hill** – is located to west / south west of Ansty Park and directly to the east of Coventry. It is a key site for ongoing consideration noting that it was not a proposed allocation within the Regulation 18 Draft Local Plan.
- 5.2.31 Moving on to (B), the first point to note is that **Ansty Park North** is around 18.75ha and is overall a strongly performing site, particularly as it will deliver only E(g)(ii)/(iii)/B2 uses (i.e. not B8). It was an allocation at the Draft Plan stage, was held constant across the RA growth scenarios at that stage (i.e. it featured as an allocation across all the scenarios) and was broadly well received through the consultation.
- 5.2.32 The allocation of Ansty Park potentially meets the recommendation for 1-2 smaller sites of circa 25ha for B1/B2 in area 7. In addition, there are two further proposed allocations at or below 25 ha in size in area 7, namely **Coton Park East** and **South West Rugby Phase 2**, and both are somewhat committed such that there is little or no doubt that they do warrant allocation (the equivalent discussion in the Interim SA Report at the Draft Plan stage presented a detailed discussion before arriving at this conclusion). However, both sites would likely deliver primarily B8 as opposed to a mix of employment uses (Coton Park East is proposed to deliver 4,000sqm of smaller units). A further consideration is that capacity of SW Rugby requires careful consideration on account of adjacent biodiversity constraint, namely [Cawston Spinney](#) ancient woodland.
- 5.2.33 The discussion above serves to highlight that the proposed strategy has clear merit. However, there does remain a need to remain open to potential reasonable alternatives.
- 5.2.34 In this regard, the first matter for consideration is the possibility of allocating **Prologis Park West and Mountpark**, at Ryton-on-Dunsmore, which was a proposed allocation in the Draft Local Plan but is now an omission site. It is located on the south east edge of Coventry and was proposed to deliver 350,000sqm of employment space. It is well located in a number of respects, particularly from an agglomeration perspective (SE Coventry is a major regional hub for logistics, manufacturing and R&D); however, the issue is road junction capacity, with the Strategic Transport Assessment (2025) identifying the development would have a significant adverse impact on queuing at the Tollbar End A45/A46 interchange. The current proposal is to replace the site with Walsgrave Hill, which performs better in transport terms whilst being able to deliver a very similar scheme and in many ways sharing locational characteristics in terms of an edge of Coventry location and agglomeration benefits (Ansty Park is adjacent). Whilst there is no possibility of allocating both sites, it is reasonable to remain open to the possibility of allocating 'Prologis/Mountpark' instead of Walsgrave Hill, i.e. the Draft Plan approach. As part of this, it is important to note that as a larger site it could potentially boost the Local Plan's contribution to Coventry's unmet need recognising that, whilst it would be B8 led, the effect of edge of Coventry manufacturing / R&D agglomeration is to suggest very good potential to also deliver non-B8 uses (as per Walsgrave Hill).

¹² The HEDNA 2022 similarly recommended: "...whilst B8 demand is very strong... there is a need for separate allocations for B1c/B2 where land is delineated from sites going for B8 in order to support the manufacturing sector."

5.2.35 The other omission sites that were a focus of attention within the Interim SA Report at the Draft Plan stage (specifically the other sites that were ‘variables’ across the RA growth scenarios) were: A) **North of Houlton** (Site 130); and B) two sites southwest of Rugby / west of Dunchurch / north of **Thurlaston** (Sites 18 and 133). The key point to note is that these sites are located outside of the West Midlands Green Belt and, as such, there is a need to consider the possibility of allocating one of these sites in place of Walsgrave Hill, which is within the Green Belt and has been confirmed as mostly *not* grey belt through the Green Belt Assessment (2025). However, the location of both North of Houlton and the two Thurlaston sites away from Coventry is a major factor that weighs against allocation, including as they would be likely to deliver predominantly B8.

5.2.36 The next omission sites for consideration are then those associated with **Magna Park**, which is a major logistics centre located on the A5 to the north of Rugby, closely linked to the M1. The Interim SA Report at the Draft Plan stage gave careful consideration to the possibility of allocation, but ultimately ruled this out as a possibility, i.e. such that the option of an employment allocation here did not feature in the RA growth scenarios at that time. The situation is broadly unchanged, and the current Green Belt Exceptional Circumstances Topic Paper explains matters as follows (emphasis added):

“The size of the land promoted at Magna Park means that this could, if allocated, remove the need for Green Belt employment allocations.

Disadvantages of the non-Green Belt options have been touched on above in the context of the discussion of commuting patterns. These concerns are particularly acute in relation to Magna Park given that site is removed from both Rugby and Coventry and draws 57% of its current workforce from Leicestershire...

Allocating a large employment site at Magna Park rather than the proposed Green Belt allocations close to Coventry would give rise to significant long-distance car commuting from Leicester, Coventry, Nuneaton, Hinckley and Rugby. The need for commuting from this wider labour catchment would be increased by the existing proposals to expand Magna Park included in the Harborough District Regulation 19 Local Plan.

The consequences of the further expansion of Magna Park in Rugby Borough for the highway network are discussed in the Strategic Transport Assessment which states:

“... it is clear that significant development trip volumes are expected at the A5/Cross in Hand roundabout... In addition to this, a significant amount of the trips to/from this site are predicted to route through the A426/A5 Gibbet Hill Roundabout. Given the capacity constraints that already exist at this junction, it is likely that the volume of additional traffic... would cause severe impacts on the SRN in this area.

Considering the above existing constraints, the lack of realistic cycling and walking opportunities, and limited bus service provision, combined with the significant trip generation predicted for this site, it is likely that there would be highway capacity issues associated with delivering this site which would be difficult to mitigate against.”

The operators of Magna Park, GLP, have a track record of delivering bus provision for staff. However, the distances involved mean this would not be as convenient as for sites close to the edge of Coventry and, in contrast to those locations, active travel would not be possible.

The NPPF advises that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (para 110). Further expansion of Magna Park would not be compatible with this objective.

*At present, Magna Park is restricted by its planning permissions to being a B8 storage and distribution location. The site promoter has indicated that there is considerable scope and occupier interest in moving away from this and hosting more B2 or research and development uses in an expanded park. **However it is not realistic for Magna Park will be able to deliver the same diversity and growth in advanced manufacturing and research and development uses that could be delivered by the proposed allocations at Ansty Park and Walsgrave Hill, for the following reasons:***

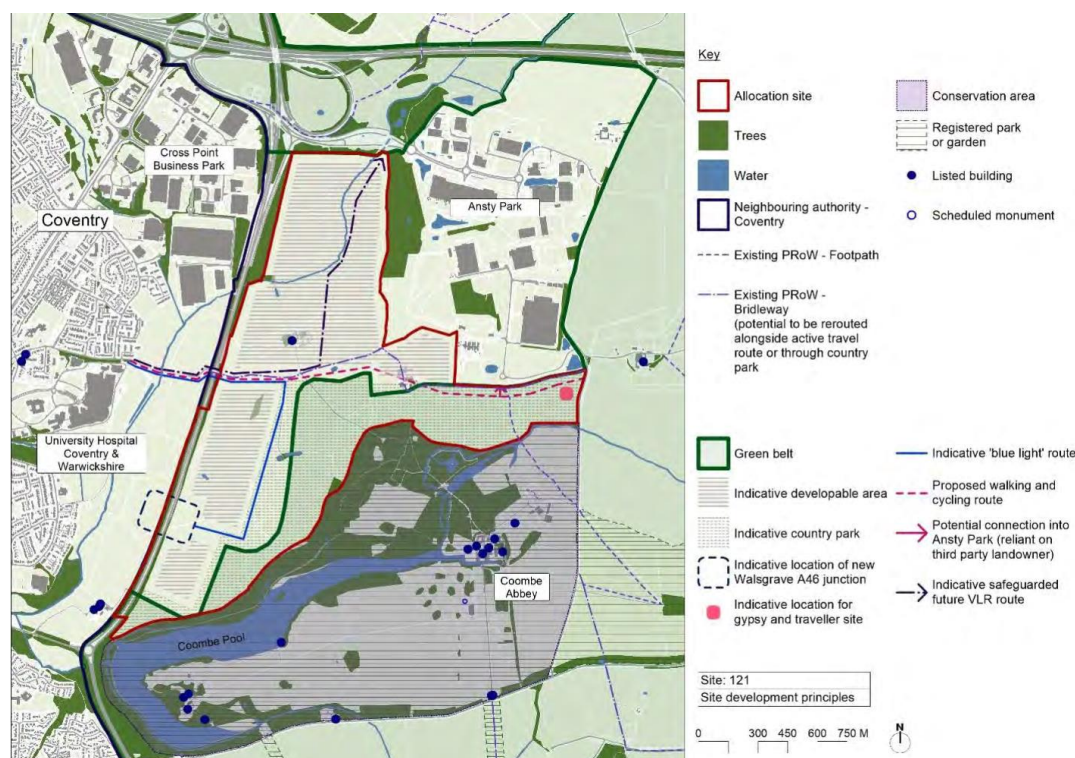
- *The WMSESS emphasises the importance to manufacturers of access to larger urban labour pools from which Magna Park is distant.*
- *Magna Park lacks the proximity to Coventry and Warwick universities...*
- *As the park at present is a logistics location, there are not the opportunities for clustering and synergies that exist on the edge of Coventry given the presence of existing important manufacturers and research institutes there...."*

5.2.37 There are also further employment omission sites and a number of these were discussed within the Interim SA Report, but all are sequentially less preferable to the sites discussed above, such that they need not be discussed further here.¹³ Prologis Park West and Mountpark, Ryton-on-Dunsmore ('Prologis/Mountpark') is the key omission site for consideration within the Green Belt, whilst the key omission sites outside of the Green Belt are: A) North of Houlton; and B) the two sites at Thurlaston (Site 18 and Site 133). Allocating the two Thurlaston sites in place of Walsgrave Hill would mean an overall lower growth scenario, but this is a reasonable scenario to test.

5.2.38 In **conclusion**, this section has gone beyond considering matters relating to employment land broad spatial strategy by also considering specific site options. This is necessary because the two matters (broad spatial strategy and site options) are highly interlinked. The outcome of this discussion is that four RA growth scenarios emerge:

- Scenario 1 – the proposed submission approach (Figure 5.3)
- Scenario 2 – Scenario 1 but with Walsgrave Hill replaced by Prologis/Mountpark
- Scenario 3 – Scenario 1 but with Walsgrave Hill replaced by North of Houlton
- Scenario 4 – Scenario 1 but with Walsgrave Hill replaced by 2 sites at Thurlaston.

Figure 5.4: The concept masterplan for Walsgrave Hill (adjacent to Ansty Park)



¹³ Para 5.2.42 of the ISA Report discussed broad locations for strategic employment sites and then there was a detailed discussion of options across paras 5.4.84 to 5.4.95 including a concise list of ruled out options, namely: Site 114 (NW Rugby); Site 253 (SE of Long Lawford); Site 94 and Site 141 (M69 J1); Site 121 and other sites near M6 J2; Site 321 (south of Hinckley); Site 71, Site 138 and others at Ryton-on-Dunsmore; Site 331 (north of Magna Park); and Site 31 (south of Magna Park). A shortlist of smaller employment omission sites was also presented; however, the clear view now is that there is limited strategic case for any such allocations, given the potential for needs to be provided for via smaller units coming forward as part of mixed strategic employment sites. One small site of note is Site 53 at Ryton-on-Dunsmore, which the Site Assessment Topic Paper (2025) explains "could be an option for a small-scale employment... allocation in a neighbourhood plan."

Housing

5.2.39 Whilst the Interim SA Report at the Draft Plan stage presented a lengthy discussion here, a more concise discussion is now appropriate for the following reasons:

- The residual number of homes that needs to be provided for in order to enable the housing requirement to be set at LHN, after having accounted for supply from commitments and a windfall assumption, is quite modest, and there are limited arguments for a housing requirement set above LHN (as discussed).
- Specifically, need is understood to be 10,812 homes in total over the period 2025 to 2042 (636 dpa) such that the residual need is **1,969 homes** having accounted for supply from commitments and a windfall assumption ($7,993 + 850 = 8,843$ homes).
- This residual need figure is slightly lower than at the Draft Plan stage (total LHN has gone down, due to a reduced plan period, but so has supply from commitments) and, furthermore, numerous of the Draft Plan allocations are now quite firmly supported in light of the consultation and wider evidence updates. Equally, some sites considered for allocation at the Draft Plan stage are now quite firmly ruled out of contention, in light of consultation and wider evidence updates.
- Furthermore, since the Draft Plan stage detailed work has been completed to significantly boost supply from urban allocations. Specifically, there are now 16 urban area allocations with a total capacity of 703 homes, which compares to 3 allocations for 195 homes at the Draft Plan stage. There is clear support for / little or no basis to question this new boost to urban supply and, in turn, the residual housing requirement to provide for via greenfield allocations essentially reduces to **around 1,300 homes** (i.e. a much lower figure than at the Draft Plan stage).¹⁴
- The overall implication that there are fewer choices now in respect of broad spatial strategy relative to the situation at the Draft Plan stage.

5.2.40 At the Draft Plan stage perhaps the key driving factor, in terms of broad spatial strategy, was to direct growth in line with the settlement hierarchy whilst ensuring a diverse portfolio of allocations, in terms of site type and geographical location. As part of this there was a strong focus on smaller greenfield sites that: A) are able to deliver early and have low delivery risk, such that they help to ensure a robust five year housing land supply and, in turn, help to minimise the risk of the Borough facing “the presumption”; and B) have strong development viability credentials such that they are able to deliver the full policy quota of affordable housing alongside delivering on wider requirements / expectations, for example in respect of infrastructure. To some extent this amounted to support for “**dispersal**”; however, it is important to recall that the overall land supply for the plan period is dominated by commitments (7,993 homes) and that the committed supply involves a major focus on supply from strategic urban extensions to Rugby.

5.2.41 To elaborate on the policy support for a strong element of ‘dispersal’ in respect of new proposed allocations, it is important to be clear that the aim is to avoid the mistakes of the past, in that a previous strong focus on supply from strategic urban extensions to Rugby has led to issues (this is also a common issue faced by other local plans nationally). Specifically, there have been unforeseen delays to delivery that have impacted the Borough’s ability to maintain a five year housing land supply and the sites in question have all faced viability challenges such that ability to deliver affordable housing, alongside delivering on wider requirements, has been severely limited (e.g. Houlton is delivering zero affordable). There are also wider arguments for dispersed smaller sites, e.g. supporting SME builders and supporting village-specific objectives.

¹⁴ It is important to be clear that this is “residual need” figure is simply the difference between: A) LHN over the plan period; and B) supply from commitments, urban sites and a windfall assumption. This is the figure that must be provided for through allocations in order to arrive at a total supply figure that precisely aligns with LHN. However, in practice there is a need to identify additional supply from allocations such that total *exceeds* LHN, e.g. by 5% or 10%. A ‘supply buffer’ of this nature is important as a contingency for unforeseen delivery issues, i.e. with a view to ensuring that the housing requirement can be delivered in practice year on year (particularly in the early years of the plan period, ahead of a new local plan to boost supply). A strong focus on supply from existing committed sites and smaller greenfield sites suggests the need for a lower supply buffer (e.g. 5%), but the new focus on supply from urban allocations suggests the need for a larger buffer, e.g. 10%.

- 5.2.42 With regards to the possibility of one or more new strategic allocations (e.g. sites delivering several hundred homes or more), it is important to be clear that there are a wide range of theoretical arguments to be made in support of such sites, such that the aim of the discussion here is not to rule out the possibility of one or more allocations. Rather, the aim is to highlight that the high level case for supporting one or more such sites through the Rugby Local Plan is not as strong as is often seen elsewhere.
- 5.2.43 It is acknowledged that the County Council is supportive of concentrating growth at strategic sites as is the Coventry and Warwickshire NHS Integrated Care Board. This is a matter discussed further below under the 'New Settlement' heading in Section 5.4.
- 5.2.44 To summarise the discussion above, there are now relatively few 'headline' choices in respect of broad spatial strategy, given: A) a reduced residual need figure to be met through greenfield allocations; B) latest evidence on the merits of specific sites, including strong support for certain of the Draft Plan allocations; and C) continued strong support for distributing new allocations in line with the settlement hierarchy and ensuring a strong element of dispersal (to ensure a balanced overall supply portfolio).
- 5.2.45 Final considerations here are then in respect of a number of important updates to the evidence base since the Draft Plan stage. Five topic areas are discussed in turn.
- 5.2.46 Firstly, with regards to **schools capacity**, this was another key 'driver' of the spatial strategy, and definition of reasonable growth scenarios, at the Draft Plan stage, with understanding at the time being that: A) there was a need to deliver a new secondary school in the north of Rugby; and B) there was a need to assign growth to villages carefully accounting for existing primary school capacity, the potential for school expansions and a need to minimise children having to travel to school. However, the issue has now reduced, as shown by detailed modelling:
- 5.2.47 With regards to secondary schools, the modelling shows a shortfall of places across all year groups from 2027 onwards which rises to peak 478 in 2033-34 then drops with the opening of the South West Rugby Secondary School in 2035 before rising again to circa 300 in the last year of the plan period. This indicates that the maximum shortfall of spaces is fewer than three forms of entry. This is also supported by the shortfall of year 7 places, which is at its peak of 117 in 2029-30 fewer than three forms of entry, but fluctuates between one and three form of entry. The most appropriate mitigation for this level of shortfall of places is likely to be expansion of existing schools, and the County Council has indicated that there is potential for up to three school expansions.
- 5.2.48 With regards to primary schools, the headline position borough-wide is a significant surplus of places, which likely reflects the outcome of lower birthrates alongside planned school openings. However, because primary school catchments are more localised, it is necessary to look at individual school place planning areas rather than just the borough-wide position. This indicates three planning areas which are projected to have shortfalls, namely: A) Rugby Rural; B) The Revel; and C) Wolvey and Bulkington.
- 5.2.49 With regards to (A), this primary school place planning area comprises five schools, but it is only two of them that are projected to exceed capacity, and at one of these schools the exceedance is marginal. This leaves Kightlow C of E Primary School in Stretton-on-Dunsmore, where demand for places is predicted to exceed the places available throughout the plan period. From 2033-34 demand is expected to exceed capacity by 100 places across years R-6. Demand for places in reception is expected to be between 40-50 places from 2028-9 onwards with 30 places available. This indicates demand exceeding capacity by half a form of entry in a single form of entry school.¹⁵

¹⁵ The position at Kightlow CofE Primary School is presented as a worst-case scenario on the basis that all children from new homes built in Stretton-on-Dunsmore attend the school; however, in 2023-24 only 54% of places at the school were occupied by children resident in Dunsmore Ward. The priority area for the school includes the parishes of Stretton on Dunsmore, Frankton, Marton, Princethorpe and Bourton and Draycote. All these parishes except for Marton lies within Dunsmore Ward. Marton lies within Leam Valley Ward. 10% of the school's pupils came from Leam Valley ward in 2023-24 and 12% in 2022-23. These statistics indicate that the consequences of the modelled increased demand at Kightlow CofE Primary School would be for a greater proportion of children to be admitted from the priority area and fewer from outside it than is currently the case. Across the Rugby Rural primary school place planning area the shortfall of capacity for years R-6 peaks in the plan period in 2040-41

- 5.2.50 With regards to (B) and (C), both areas comprise single schools, and it is important to note that the model presents a worst-case scenario because it assumes all pupil yield from new housing in Wolvey and Brinklow respectively would go to these schools which is an unrealistic assumption. Nonetheless, the projected shortfall of places (years R-6) remains marginal, peaking at 22 pupils at The Revel and 38 at Wolvey. When looking at just reception admissions, neither school shows a shortfall in spaces. Furthermore, supplementary analysis shows that only a proportion of local residents in both areas send children to the local school, which adds further comfort.
- 5.2.51 Finally, with regards to primary school capacity, it is important to note that surplus capacity can lead to school viability issues and so pressure for school closures, but this is not known to be a major risk locally at the current time.
- 5.2.52 A second new evidence base consideration is **Green Belt Assessment**, with a two stage Green Belt Assessment (GBA) having recently been completed following the introduction of 'grey belt' as a new category of Green Belt in December 2024 and publication of GBA guidance in early 2025. The Stage 1 assessment identifies large swathes of the rural area as provisional grey belt,¹⁶ whilst land adjacent or in proximity to a 'large built up area' requires detailed consideration before identifying any provisional grey belt, which is the focus of Stage 2. Headline findings are:
- All land surrounding those villages distant from a large built-up area comprises grey belt, which includes Wolvey, Brinklow, Wolston and Stretton-on-Dunsmore.
 - Land adjacent or in close proximity to Coventry, Rugby, Hinckley or Magna Park (considered to represent a large built-up area in combination with Lutterworth) may not be grey belt due to making a strong contribution to Purpose A (preventing the sprawl of large built-up areas). This includes land surrounding the larger villages of Ryton-on-Dunsmore, Binley Woods and Long Lawford.
 - Stage 2 of the GBA then examines contribution to Purpose A in detail within the relevant areas and specifically examines 18 parcels intersecting 9 key site options. The conclusion is that 9 of the 18 parcels do not make a 'strong' Purpose A contribution hence they are provisional grey belt – see Figure 5.5.

Figure 5.5: Stage 2 Green Belt Assessment summary findings

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

and 2041-42 and 44 and 53 places. The shortfall in places in reception across the planning area peaks at 6 and 7 in the same years. These shortfalls do not indicate a need for school expansion, but there will be a need for close monitoring.

¹⁶ Specifically, this land is "provisional" grey belt subject to consideration of NPPF footnote 7 constraint. However, the Draft NPPF published for consultation on 16th December 2025 proposes to remove footnote 7 constraint as a factor for the purposes of identifying grey belt, such that it may transpire that all currently identified provisional grey belt is in fact grey belt.

- 5.2.53 A third new evidence base consideration is **Strategic Transport Assessment (STA)**, with work now having been completed to model the impacts of various growth scenarios, accounting for modal shift and mitigation assumptions. This is an inevitably complex exercise, but an initial point to note is that it identifies the “sensitive locations”: 1) A5/A426/Gibbet Hill Roundabout; 2) A426/A4071 Avon Mill/Hunters Lane (an improvement scheme is proposed); 3) A426/Boughton Road Roundabout; 4) Rugby Gyratory; and 5) A45/A46 Toll Bar End junction.
- 5.2.54 A second point to note is that the STA has significant implications for employment strategy / site selection, which is a matter that has been discussed above, and which is also discussed further below in Section 6.
- 5.2.55 With regards to housing growth, the STA flags limited concerns regarding a strategy involving modest proposed new allocations distributed accounting for the settlement hierarchy with an element of dispersal (see discussion above).
- 5.2.56 Finally, the STA looks at two large-scale strategic site options, namely:
- Lodge Farm – is a new settlement option between Rugby and Daventry that was an omission site at the Draft Plan stage but nonetheless was closely considered through the appraisal of RA growth scenarios within the Interim SA Report. Transport is a major issue, in that there would be a need to deliver major transport upgrades and the achievability, suitability and viability of the necessary upgrades is highly questionable (see further discussion below).
 - North West Rugby – again was an omission site at the Draft Plan stage but was closely considered through the appraisal of RA growth scenarios. It performs better in accessibility and transport terms, and a package of necessary transport upgrade interventions has been identified that is likely achievable; however, the cost of delivering the necessary upgrades would again lead to viability challenges.
- 5.2.57 A third new evidence base consideration is **Viability Assessment**, with a key aim being examine the plan as a whole and consider whether allocations will be able to viably deliver the full policy quota of affordable housing alongside delivering and/or making a financial contribution (CIL / S106) to infrastructure as necessary and also delivering on wider policy ‘asks’ with cost implications, for example in respect of net zero development. Additionally, viability work has specifically considered the two key strategic site options introduced above, namely Lodge Farm and North West Rugby.
- 5.2.58 Taking these matters in turn:
- Whole Plan Viability – the viability of proposed allocations varies considerably, ranging from allocations at rural villages where viability is strong to urban allocations where viability is very challenging. The implication of challenging viability with respect to the new proposed urban allocations is that: A) delivering affordable housing will be challenging, which then lends weight to the argument for supporting small to medium sized greenfield allocations at villages that can viably deliver affordable housing, with a view to delivering on borough-wide needs; and B) challenging viability could lead to a need for protracted negotiations or otherwise could lead to a risk of site delivery being delayed or even a risk of sites not coming forward at all; which, in turn, serves to highlight the importance of a robust supply of greenfield sites able to deliver early and with lower delivery risk. Two headline conclusions from the Whole Plan Viability Assessment are as follows:

“We have appraised residential schemes with a range of affordable housing from 0% to 50%, which covers the... percentages sought by emerging Policy H2 (20% on developments in the Rugby Urban Area; 30% elsewhere; and 40% on sites released from the Green Belt). While there is a range of viable percentages... the emerging policy requirement can be achieved in most scenarios. A limited amount of scheme-specific testing may be required... particularly on sites brought forward on previously developed land in the Rugby Urban Area.

“Where developments are of strategic scale, our appraisals indicate that they may not be able to viably absorb the additional infrastructure required, as well as providing 30% affordable housing (or 40% affordable housing when developments are brought forward on sites released from Green Belt).”

“Policy 16 requires that developments contribute towards the provision of education. Our appraisals test the impact of contributions totalling £10,000, £15,000 and £22,500 per unit, and higher contributions clearly have an impact on the ability of developments to meet other policy objectives, notably affordable housing.”

“When the emerging policies are tested on a cumulative basis and having regard to the Borough’s housing land supply being predominantly greenfield sites, developments in the Borough will be able to absorb the cumulative impact of the emerging policies in most cases.”

- Lodge Farm – Warwickshire County Council officers have assisted RBC officers in identifying indicative budget figures for the infrastructure needed to deliver Lodge Farm. These include £35m for a 5FE secondary school, £28m for two primary schools, £10m proposed by the promoters for bus routes, £7m for the cycle link to Dunchurch, £61m for a significant upgrade to the Thurlaston interchange (likely comprising grade separation) and £30m for an A45 bypass of the new village. The viability of this strategic infrastructure package is modelled in the Viability Assessment, and this shows that Lodge Farm is a long way from being a viable proposition even at 0% affordable housing. It would be necessary to significantly increase the number of dwellings and/or significantly cut the infrastructure which is needed to make the new village sustainable and mitigate its impacts.
- North West Rugby – the required on-site infrastructure is comparable to Lodge Farm and includes a secondary school and two primary schools. The largest highways infrastructure costs for the scheme would be widening two roundabouts, the creation of two new roundabouts, a new canal bridge and the creation of a link road between Overview Way and Cosford Lane. The combined estimated cost of these highways schemes is circa £35m.

The combined infrastructure bill means that the scheme could likely deliver 20% affordable housing, which is below the 30% current policy requirement and well below the new proposed 40% ‘golden rule’ for sites released from the Green Belt.

A related consideration is that North West Rugby is contingent upon an upgrade scheme being delivered by National Highways for the A426/A5 Gibbet Hill Roundabout. At present no preferred scheme has been identified and no upgrade is funded, which introduces, or adds to, considerable delivery risk.

5.2.59 A fourth and final new evidence base consideration is **Landscape Sensitivity Assessment**, with a considerable amount of work has been undertaken prior to and subsequent to the Draft Plan stage. This work is presented across three reports, namely: A) a report dealing with strategic sites, with select sites considered in particular detail via a “post mitigation assessment”; and B) a report dealing with non-strategic sites; and C) a report that considers the potential to justify designation of Special Landscape Areas and ‘Areas of Separation’. Taking these matters in turn

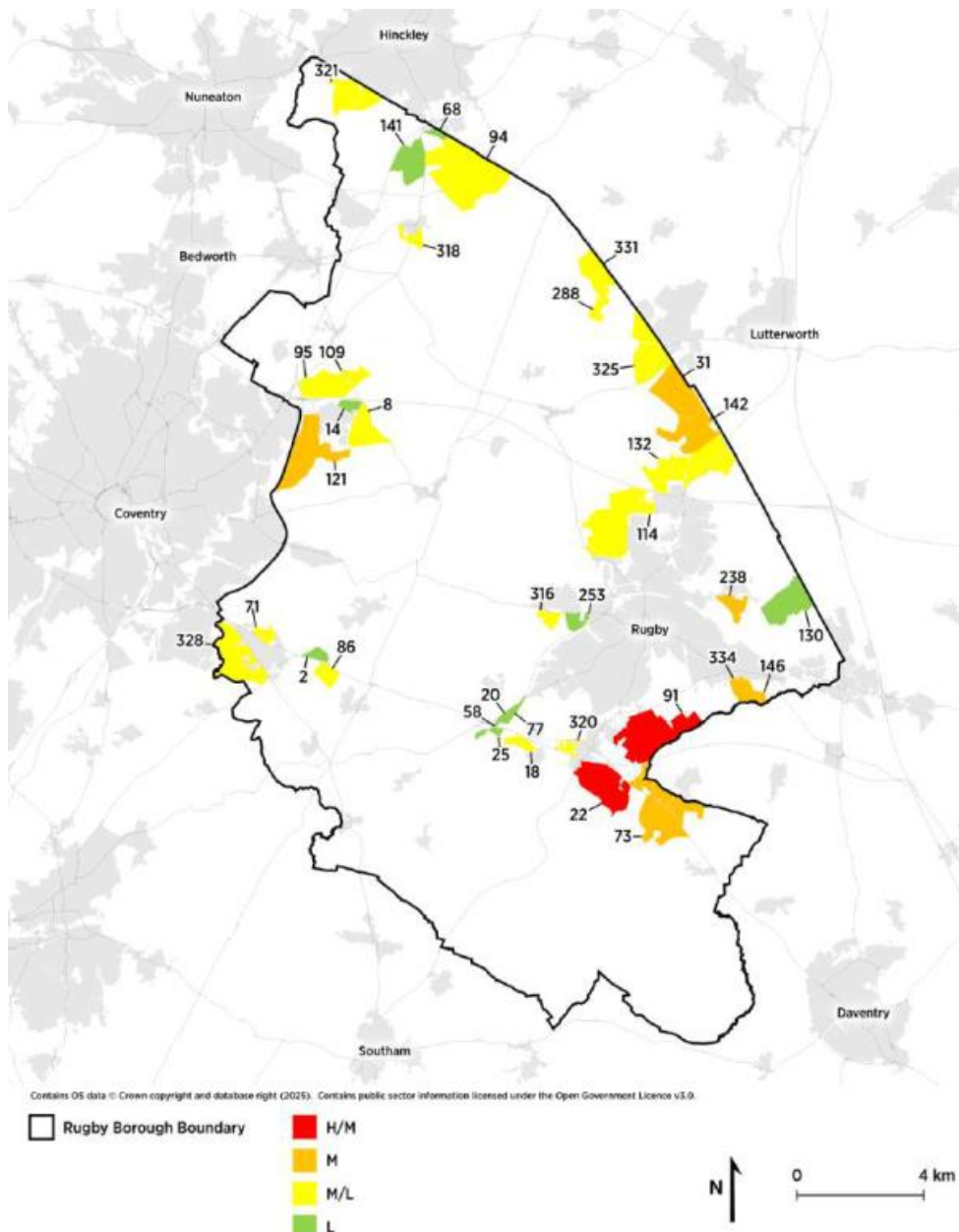
- Strategic site options – Figure 5.6, which also shows the overall sensitivity conclusion reached for each site, serving to highlight two large sites south of Rugby as more highly sensitive, although in practice neither site is considered a realistic contender for allocation. Figure 5.6 also shows two key site options (discussed above) as subject to a degree of constraint, namely Lodge Farm (site 73) and Land at Walsgrave Hill (site 21), whilst Land North of Houlton (site 130), which is discussed above as an employment land omission site that warrants ongoing close consideration, is shown as having low sensitivity. Finally, with regards to work to consider select sites in respect of the potential to mitigate landscape impacts, a key point to note is that Land at Walsgrave Hill has potential for mitigation leading to “medium/low” sensitivity.

- Non-strategic site options – key points to note include: A) one notable site is identified as having medium/high constraint, namely a previously proposed allocation at Wolvey (site 84); and B) a number of notable site options have “medium” constraint, including sites at Brinklow, Binley Woods and Clifton-upon-Dunsmore. Specific site options are discussed further in Section 5.4.
- Local landscape designations – a character assessment ahead of the Draft Plan stage explored three broad character areas – Dunsmore, Feldon and High Cross Plateau – and this informed a decision to designate one sub-area within the Feldon character area – the Ironstone Fringe – as locally significant.

However, further work undertaken subsequently does not support retention of that proposed designation. Subsequently further detailed work has been undertaken, and the new proposal is to designate the Rainsbrook Valley as locally sensitive. The proposed designated area abuts the southern edge of Rugby (Hillmorton), and there were two proposed allocations in this area at the Draft Plan stage.

- Settlement separation – the evidence base also includes an areas of separation study which highlights the risk of coalescence between Rugby and the villages of Clifton upon Dunsmore and Dunchurch/Thurlaston.

Figure 5.6: Landscape sensitivity of strategic site options (pre-mitigation)



Gypsies, Travellers and Travelling Show People

- 5.2.60 For context, it is important to note that the adopted Local Plan 2011-2031 did not allocate land for pitches, which has had consequences not only for the Travelling community but also more widely in that the Council is often unable to resist unauthorised development and Traveller pitches have been approved on appeal; indeed, the Council has already lost two Gypsy and Traveller appeals in 2025.
- 5.2.61 Moving forward there is a need for a step change in respect of providing for Traveller accommodation needs, not only because failing to provide for accommodation needs has major consequences for the Travelling community, but also because failing to take a suitably proactive approach would represent a risk to the soundness of the Local Plan. In the case of the 2011-2031 Local Plan examination the Inspector was persuaded that a subsequent Gypsy and Traveller Site Allocations DPD would allocate land for pitches, but that DPD was abandoned, which is a common issue nationally.
- 5.2.62 There is now an opportunity to take a strategic approach (no local plan for the Borough has ever allocated sites for Travellers) and the current proposed approach is broadly unchanged from that at the Draft Plan stage, with three categories of allocation:
- Firstly, allocation of longstanding private sites which currently have temporary planning permission, which applies to sites at Rosefields, Wolvey and Top Park, Barnacle. These sites were allocations at the Draft Plan stage, although it is noted that Top Park, Barnacle was previously thought to involve 15 pitches but now is understood to involve 22 pitches, and there is surface water flood risk.
 - Secondly, new/expanded private sites at Bryant Bungalow, Brandon Lane, and Wilsher Ranch, Shilton Lane. Both of these sites were previous allocations at the Draft Plan stage, and the Interim SA Report flagged limited concerns. The former would involve expansion of an existing site, and the latter is in proximity to existing sites, which suggests good potential to provide for needs arising from existing sites. An issue with Wilsher Ranch, Shilton Lane is that allocation risks an over-concentration of pitches in one area; however, this is the only 'new' stand-alone allocation option that is available and reasonably in contention at the current time.
 - Thirdly, allocation of land for new private pitches as part of a large employment site allocations. Specifically, the current proposal is for an 8 pitch allocation within the Walsgrave Hill strategic employment allocation, whilst at the Draft Plan stage the proposal was to deliver pitches at Coton Park East and at Prologis Park West and Mountpark (which is now an omission site, as discussed). Delivering pitches as part of new employment allocations does not generate major concerns, including because the delivery risk is potentially less than is the case for pitches proposed as part of residential led strategic schemes, but masterplanning and design factors required careful consideration. Also, there is a need to recognise that pitches within employment sites may not be ideally located in the sense of being distant from the existing communities from where needs arise.
- 5.2.63 Overall, the current proposed allocations, together with other sources of supply, would deliver 68 pitches against a 2024-2042 need for 94 pitches. This comprises 45 pitches from allocations, 14 pitches from permissions and 9 pitches from household dissolution.
- 5.2.64 This would be adequate to demonstrate supply until the mid-2030s, plus there may be some windfall. Whilst in theory there is a need for ongoing consideration of higher growth scenarios, in practice there are limited options, with considerations being:
- There are no omission sites reasonably in contention for allocation.
 - There are not known to be any residential led schemes with potential to deliver pitches, e.g. this is not the proposal at either Lodge Farm or NW Rugby (and a requirement to deliver pitches could further impact already challenging viability).
 - Whilst consideration should continue to be given to the possibility of the Coton Park East employment allocation delivering pitches (as per the Draft Plan approach), this is not a matter that warrants further scrutiny here, i.e. via explore growth scenarios.

Conclusion on broad spatial strategy

5.2.65 This section has covered:

- Employment land – this section goes as far as defining four RA growth scenarios.
- Housing – this section sets out key factors to frame the discussion of settlement growth scenarios in Section 5.4 and ultimately RA growth scenarios in Section 5.5.
- Gypsies and Travellers – this section is able to reach the conclusion that there is only one reasonable growth scenario, namely the proposed submission approach.

5.3 Site options

5.3.1 This section considers the process led by RBC officers to consider site options.

5.3.2 **Stage 1** in the process was the Housing and Economic Land Availability Assessment (HELAA). The first step was to seek possible sites for allocation by having a public call for sites, reviewing existing and lapsed planning permissions, reviewing allocations of land from the current Local Plan and officers identifying potential sites. The assessment then involved a desk-based review to consider availability, achievability and suitability, and sites that were discounted through the HELAA were not carried forward to Stage 2. Also, sites found to perform well through the HELAA, in that they are 'suitable', were not taken forward to Stage 2 (i.e. the aim of Stage 2 is to focus on the more marginal sites).

5.3.3 A HELAA addendum was produced following Regulation 18 Draft Plan stage adding 11 further sites and updating the analysis for 5 previously assessed sites.

5.3.4 **Stage 1b** is then the Urban Capacity Study (UCS). This complements the HELAA by identifying additional potential capacity for new residential development within the Rugby urban area, beyond the sites included in the HELAA. The UCS proactively assesses potential sites using the Brownfield Land Register, Rugby Regeneration Strategy and fieldwork, in addition to those received by a specific call for sites. Sites are assessed using the same three core criteria as the HELAA: availability, achievability and suitability. The study identified 20 sites as being suitable, (potentially/likely) viable, and available. 11 of these sites are ultimately taken forward for allocation, whilst 9 sites are not taken forward, despite the UCS findings (3 of which were included in the HELAA) for quite clear cut reasons that are listed in Table 1 of the Site Assessment Topic Paper (2025). Additionally, one site was not found to be deliverable by the UCS but is taken forward by the Local Plan as a site allocation, with the reasoning set out in Table 2 of the Site Assessment Topic Paper. There is no reasonable need here, within the SA Report, to question the approach taken in respect of urban sites.

5.3.5 **Stage 2** is the 'Site Assessment'. It involved a series of workstreams:

- Site visits – were completed by RBC officers for all sites.
- Transport analysis – a range of quantitative and qualitative methods were employed, as discussed within the Site Assessment Topic Paper.
- National Highways – were consulted on sites likely to impact on the Strategic Road Network. Further National Highways comments on individual sites were not sought subsequent to the Draft Plan stage except as part of the Strategic Transport Assessment (which is discussed above in Section 5.2).
- Water Resources – to gain an understanding of potential foul water drainage or surface water drainage limitations, consultation with the relevant water company, Severn Trent Water, was undertaken. Also, following the regulation 18 preferred options consultation a stage 2 Water Cycle Study was prepared.
- Education – school place planning advice was sought from Warwickshire County Council, and some additional research to understand the capacities of local schools and by extension potential impacts from proposed development was also undertaken (as discussed above in Section 5.2).

- Landscape – detailed work has been undertaken as discussed in Section 5.2.
- Ecology – a desktop screening process was undertaken to identify sensitive sites given SSSIs, Local Wildlife Sites and distinctive habitats. For these sites a subsequent and more thorough assessment was then prepared. Assessments were updated following the Regulation 18 consultation where necessary.
- Heritage assets assessment – a preliminary desk-based screening was undertaken by the RBC conservation officer to identify those sites which may contain a designated heritage asset, or where development may impact on the setting of a designated heritage asset. Subsequent site visits and assessment of sites with potential sensitivities were undertaken by consultants. This identified where there may be impacts and what appropriate mitigation measures could be required. Further updates to this were made following the Regulation 18 consultation.
- Green Belt – this was a key input subsequent to the Draft Plan stage, as discussed above in Section 5.2. It allows for the identification of ‘provisional’ grey belt.
- Identification of opportunities – this considers opportunities for other public benefits that the proposed type of development could deliver. This principally draws in information supplied by site promoters.

5.3.6 The following statement from the Site Assessment Topic on method is of note:

“Site analysis and selection is not a mathematical process. It is, unavoidably, an exercise in planning judgement. This is the judgement of professional planning officers at Rugby Borough Council. Officers have sought to synthesise all information available into an overall judgement on whether a site should be progressed as a site allocation. That judgement cannot reasonably, and should not, apply a simple decision tree e.g. all sites with landscape sensitivity “medium” or ecology sensitivity “high” are rejected. Similarly, judgements are relative rather than absolute. For many of the sites there are no absolute constraints that would prevent them being developed. However, they may nonetheless not be progressed because they are relatively more constrained than other site options. The overall judgement seeks to balance constraints and opportunities on each site. For example, a site with medium landscape sensitivity may have relatively lower sensitivity for other constraints or be well located and offer significant other opportunities when compared to another site with medium landscape sensitivity.”

5.3.7 The Site Assessment Topic Paper presents a proforma assessment for 115 site options in total, and the outcome is that each site option is categorised as either: A) progressed as an allocation within the Local Plan; or B) not progressed (i.e. an ‘omission site’).

5.3.8 As such, when considering which sites should be a ‘variable’ across the RA growth scenarios (Sections 5.4 and 5.5), there is a need to consider: A) those proposed allocations where there is potentially a case for non-allocation; and B) those omission sites where there is potentially a case for allocation.

5.3.9 This situation is slightly different to that at the Draft Plan stage, at which time the outcome of the Site Assessment was a shortlist of site options with potential for allocation, such that the role of Sections 5.4 and 5.5. within the Interim SA Report was to form RA growth scenarios comprising combinations of the shortlisted site options.

5.3.10 The new approach of selecting proposed allocations through the Site Assessment process is reasonable recognising that it draws upon consultation and SA work from the Draft Plan stage, including the appraisal of RA growth scenarios from that stage.

5.3.11 In **conclusion**, the 115 site options considered within the Site Assessment Topic Paper are a starting point for the analysis below within Section 5.4 and, as part of this, weight should be given to the Topic Paper’s conclusion for each site option, namely: A) “progressed” as a proposed allocation; or B) “not progressed” i.e. an omission site.

5.4 Settlement scenarios

Introduction

- 5.4.1 Discussion has so far focused on A) ‘top down’ consideration of strategic factors (growth quantum and broad spatial strategy); and B) ‘bottom-up’ consideration of site options.
- 5.4.2 The next step is to explore alternative ways of allocating sites in combination (‘growth scenarios’) in order to deliver on strategic objectives. This is done by sub-area, which in practice means considering individual higher order settlements in turn.
- 5.4.3 There is merit to planning at the settlement scale because objectives are often established at this scale which can then usefully feed into work to progress / rule out site options and define growth scenarios. For example, a site options might perform well when viewed in the context of other sites at the borough-scale, but when viewed at the settlement scale it might be found that there are preferable sites that would deliver on objectives, such that the site can be ruled out. Vice versa, a site might perform poorly when viewed through a borough-wide lens but better when viewed through a settlement lens because in combination with other sites it will deliver on objectives.

Methodology

- 5.4.4 For each settlement the aim is to draw together the ‘top down’ and ‘bottom up’ inputs discussed above before concluding on scenarios to take forward to Section 5.5, where the aim is to combine settlement scenarios to form borough-wide RA growth scenarios.
- 5.4.5 Site options are discussed in a broad order of preference with attention focusing on those sites where the question of allocation versus omission site is more marginal. To elaborate, the aim is not to focus discussion on those proposed allocations that are considered relatively clear cut, nor those omission sites where there is not considered to be a strong case for allocation (given strategic and/or site specific factors).
- 5.4.6 It is important to note that the aim is not to present a formal appraisal, but rather to contribute to “an outline of the reasons for selecting” the RA growth scenarios ultimately defined in Section 5.5 and then subjected to appraisal in Section 6.

Which settlements?

- 5.4.7 All of the higher order settlements (Rugby plus the nine main rural settlements) are considered in turn, before consideration is given to lower order settlements (rural villages) and then finally the possibility of a new settlement.
- 5.4.8 By way of further introduction to the nine main rural settlements, it can be noted that there are important differentiating factors including:
- Links to a higher order settlement – links to Coventry was a key factor influencing spatial strategy / site selection when preparing the adopted Local Plan, recognising that the aim was to provide for unmet need from Coventry, with the Inspector’s Report explaining: “...the four proposed MRS allocations at Ryton on Dunsmore, Binley Woods and Stretton on Dunsmore are close to the urban edge of Coventry and well connected to it by the strategic road network (via the A46 and A45).”¹⁷ There is no need to provide for unmet need from Coventry at the current time, but it remains the case that access to a higher order settlement is a key consideration.
 - Rural Sustainability Study (2025) – scores villages by access to services, public transport and internet. Dunchurch has comfortably the best overall score, followed by Binley Woods and Wolston, whilst Wolvey has the lowest overall score followed by Ryton-on-Dunsmore. Of the remaining villages, there is a notable distinction between two with a better local offer (Brinklow and Clifton upon Dunsmore) and two with better public transport (Long Lawford and Stretton-on-Dunsmore).

¹⁷ The adopted Local Plan also directed two allocations to Wolvey (less well linked to Coventry), but one was a previously developed site not within the Green Belt and the other was a very small site (15 homes).

- Green Belt – seven of the nine are within the Green Belt, specifically all bar Dunchurch and Clifton upon Dunsmore. Three of the seven Green Belt villages are located close to the edge of a large built-up area, namely Binley Woods, Long Lawford and Ryton-on-Dunsmore such that there is the potential for land around the village to make a contribution to Green Belt Purpose A (as discussed).

5.4.9 Finally, there is no need for specific sections covering the possibility of growth at either:

- Edge of Coventry – there are no clear options for housing growth on the edge of Coventry, with attention instead focusing on villages near to the Coventry. The A46 “represents a strong, clearly defined boundary” to the City (para 72 of the adopted Local Plan Inspector’s Report), whilst land in the vicinity of the two junctions is suited to employment land as opposed to residential or mixed use development.
- Edge of Hinckley – land to the south of Hinckley within Rugby Borough is separated from Hinckley by the A5 and this is a sensitive Green Belt gap between Hinckley and Nuneaton. Land could be more suited for employment than residential (Padge Hall Farm is located here) but there are constraints including A5 junction capacity, an area of ancient woodland close to M69 J1 and higher quality agricultural land. It is recognised that a new Nuneaton Parkway in this area is a long term aspiration, as understood from the [Warwickshire Rail Strategy](#), but there is no certainty regarding the deliverability of any such scheme at the current time.

Rugby (inc. Houlton and Newton)

5.4.10 In addition to supply from commitments (which is high, as discussed), the current proposal is to allocate 18 sites for a total of 1,258 homes.

5.4.11 Beginning with **the urban area**, two allocations from the Draft Plan stage are retained (Site 62, Morgan Sindall House; 90 homes; and Site 332, Albert Street; 25 homes) and then there are 13 new proposed urban allocations for a total of 583 homes following the Urban Capacity Study, as discussed in Section 5.3.¹⁸ Within the scope of this current exercise (to define RA growth scenarios), there is no basis to question the proposed approach to urban supply from a suitability perspective. However, it is important to acknowledge that urban sites can tend to be associated with high delivery risk and/or viability challenges such that they risk not being able to deliver the full policy quota of affordable housing; indeed, it is common for urban sites to not deliver any affordable, even in parts of the country with strong development viability.

5.4.12 With regards to non-urban allocations, a first port of call is Land south of Crick Road, Houlton (**Site 338**; 250 homes) which is unchanged from the Draft Plan stage. This is an existing employment allocation, but is now being promoted for residential, which does not generate significant concerns, given the extent of employment land nearby. The safeguarded land for Rugby Parkway Station is adjacent, such that the site should be suitable for higher density development. Overall, this site performs very strongly.

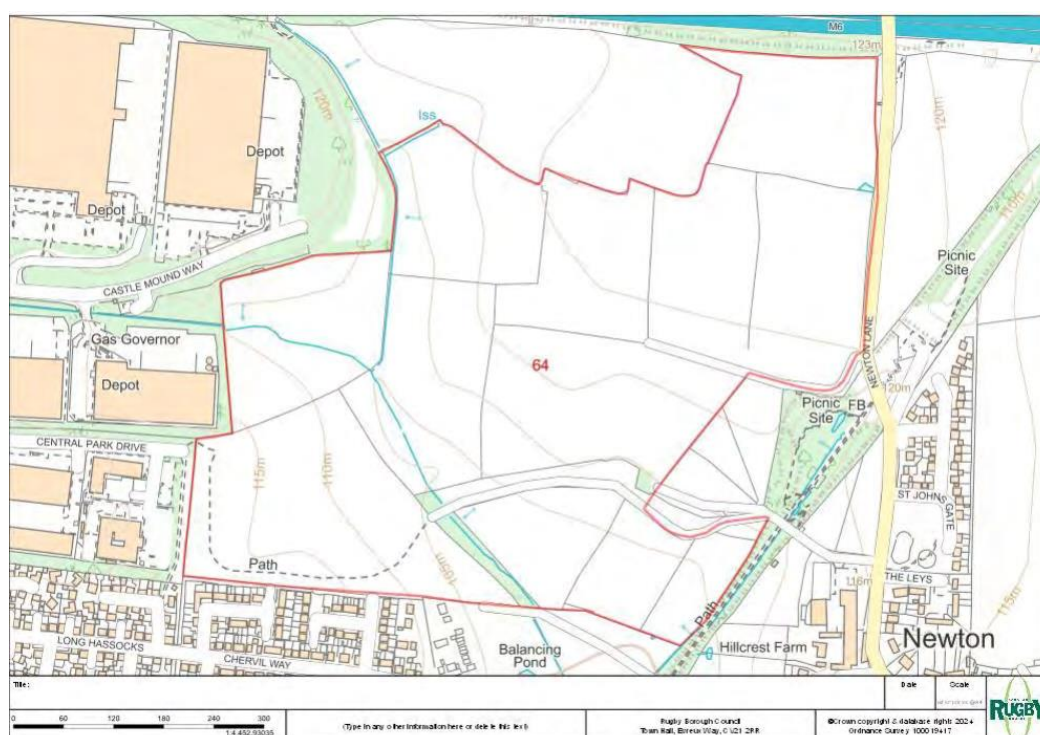
5.4.13 The other non-urban allocation that is unchanged from the Draft Plan stage is Hillcrest Farm, Newton (**Site 87**; 25 homes). This comprises previously developed land (farm buildings; not shown on the pre-WWI OS map) and, whilst Newton is a ‘rural village’ in the settlement hierarchy, it has comfortably the highest ‘settlement score’ of any of the rural villages, as understood from the Rural Sustainability Study (2025), largely on account of good links to Rugby. At the Draft Plan stage the equivalent discussion within the Interim SA Report gave weight to a proposal to boost Newton’s settlement score with the allocation of land nearby for a secondary school (discussed below), which is no longer the proposal (as discussed in Section 5.2), but regardless Site 87 is a strongly performing site. The equivalent discussion in the Interim SA Report also explained:

¹⁸ Site 153 – Westway Car Park (24 homes); Site 279 – Stagecoach Car Park (32 homes); Site 283 – Rugby Central Shopping Centre (200 homes); Site 294 – Land adj. 9 Railway Terrace (14 homes); Site 349 – Land rear of Albert Street (5 homes); Site 350 – Rounds Gardens (70 homes); Site 351 – North of Rounds Gardens (60 homes); Site 352 – Former snooker hall, Railway Terrace (7 homes); Site 353 – Town Hall (114 homes); Site 354 – 92 Lower Hillmorton Road (34 homes); Site 355 – Land adj. 44 Craven Road (5 homes); Site 356 – The Railings (NHS) Rugby (10 homes); and Site 357 – 28-29 High Street (8 homes).

“there is a need to consider how links west to Rugby might be improved... Another consideration is that the landowner has promoted a larger scheme to include greenfield land, and so the question arises as to whether there is a case for planning comprehensively for growth west of Newton, with a view to securing benefits (e.g. connectivity; feasibly a primary school) and addressing constraints (e.g. the former railway line to Lutterworth/Leicester is a Local Wildlife Site, LWS).”

- 5.4.14 A representation was then received through the Draft Plan consultation proposing a 65 home development at Site 87 along with a small employment development to the north. The case for limiting housing growth at Newton is recognised, and the proposed employment site may not be suitable (Coton Park East is adjacent), but consideration might be given to ensuring comprehensive growth that leverages the maximum planning gain, rather than risk piecemeal growth over time with opportunities missed. Figure below shows Newton in the context of Coton Park East (Site 64), with the sites in question located directly to the west and north of Newton.

Figure 5.7: Coton Park East providing important context to growth at Newton



- 5.4.15 The final proposed allocation is then Newton Manor Lane, Brownsover (**Site 59**; 285 homes), where the proposal is now to increase the site capacity by 45 homes relative to the Draft Plan stage. The site is located close to Site 87 and was supported at the Draft Plan stage partly because the landowner was committed to making adjacent land available for the aforementioned secondary school that is no longer required. However, the site is considered to have merit as an allocation regardless of the secondary school consideration. It is noted that the proposed list of site-specific requirements is now lengthier, compared to that at the Draft Plan stage, which is presumably a reflection of the boost to capacity. Ensuring good links into Rugby is a key consideration, and ongoing consideration should also be given to ‘future proofing’ in light of the ongoing possibility that a secondary school is required on adjacent land (it is noted that site promoter’s 2025 consultation response was clear that land can be made available).

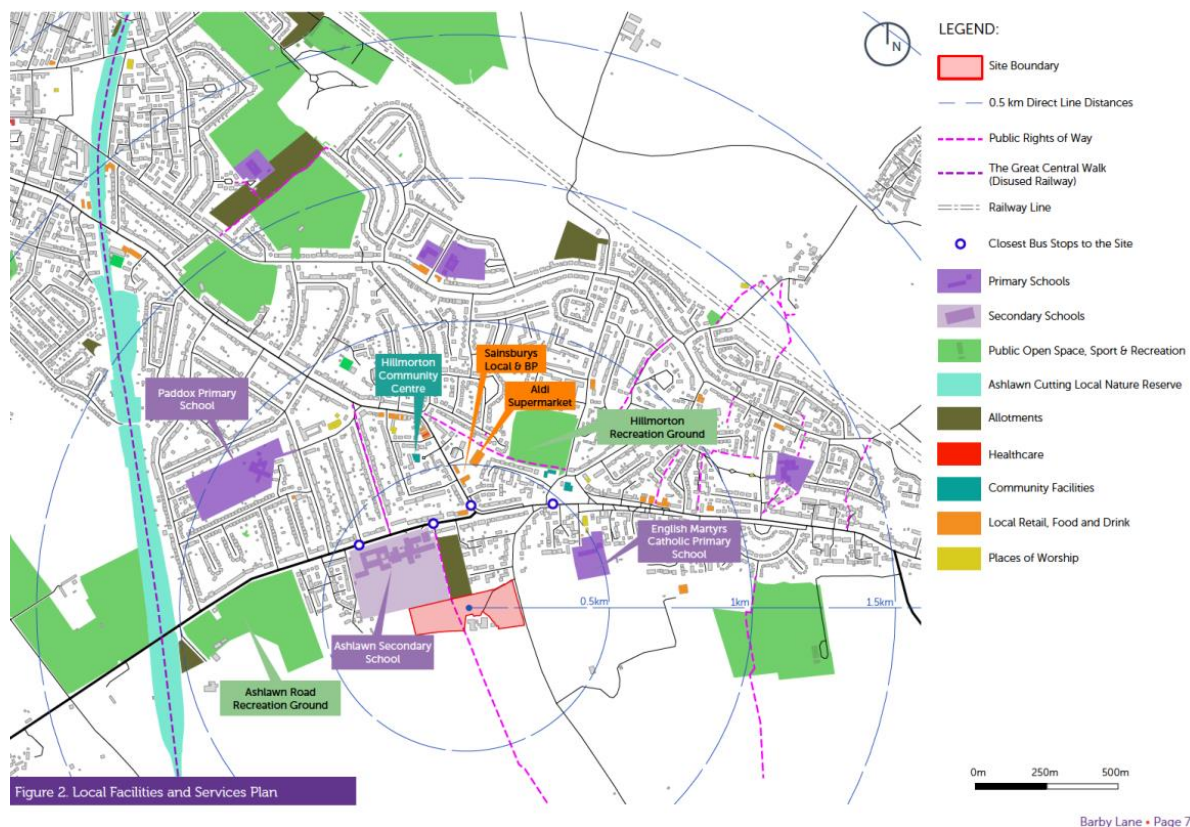
[illegible]

5.4.20 The next omission sites for consideration are the remaining two sites that were previously allocations at the Draft Plan stage but are now ruled out for quite clear cut reasons, namely Fenley Fields, Rugby (**Site 122**; 80 homes) and Lea Crescent, Newbold-on-Avon (**Site 75**; 20 homes). The former site is no longer available, whilst the latter site comprises open space and, as a small site, there is no reasonable need to give further consideration here to the option of allocation as part of the current exercise.

- 5.4.21 The next omission site for consideration is then North West Rugby strategic urban extension (**Site 114**; 1,200 homes in the plan period), which was not an allocation at the Draft Plan stage but was examined in detail through the appraisal of RA growth scenarios. There is now considered to be a reduced case for allocation, in that: A) there is less case for allocation in quantitative terms, as discussed in Section 5.2; B) new evidence finds that the site mostly does not comprise grey belt; C) new evidence confirms the viability challenges that were previously suspected; and D) there is now no longer a need for a new secondary school in the north of Rugby, which was previously a key factor in support of exploring the option of allocation in detail. However, on balance it is nonetheless considered appropriate and ultimately reasonable to test the option of allocation, including because it is important to test the merits of supporting strategic growth locations as a comparator to the merits of a strategy focused on smaller sites (including because the County Council supports strategic sites and/or a concentration of growth at higher order settlements, as discussed further below).
- 5.4.22 The omission sites discussed above are those that are best performing such that there is limited pressure to consider further omission sites, given that the proposed submission allocations are all quite strongly supported and given the number of homes needed from allocations at Rugby under a reasonable high growth scenario. However, on final site of note is **Site 16**, which is notably located adjacent to the west of Site 334 to the south of Rugby (Hillmorton). This site is not progressed to the RA growth scenarios, but its active promotion serves to highlight the need to take a comprehensive long-term approach to any growth in this area, i.e. avoiding problematic piecemeal growth with resultant issues and opportunities missed. As part of this, it can also be noted that Site 334 is a smaller part of a wider parcel of land that has been promoted as available for development. For context the figures below show the proposed concept masterplan for Site 16 and also the context of community infrastructure at Hillmorton. It is also important to note the context of nearby committed Rugby Parkway Station.

Figure 5.9: Concept masterplan for Site 16 submitted by the site promoter in May 2025



Figure 5.10: Further information submitted by the promoters of Site 16

- 5.4.23 In conclusion, there are **four reasonable growth scenarios** for Rugby:
- 1) The proposed submission approach (18 allocations for 1,258 homes)
 - 2) Scenario 1 plus the two Hillmorton sites (1,533 homes in total)
 - 3) Scenario 1 plus the North West Rugby (2,458 homes in total)
 - 4) Scenario 1 plus the two Hillmorton sites and NW Rugby (2,733 homes in total)

Binley Woods

- 5.4.24 This is the first of the Main Rural Settlements for consideration (by alphabetical order).
- 5.4.25 The village dates from the early to mid-20th century when plots of land for development were made available on an area of woodland / common-land. Accordingly, the village has low historic environment sensitivity and a distinct character and built form, having more-or-less not expanded beyond its original extent, although a small allocation from the adopted Local Plan (2019) was recently delivered.
- 5.4.26 The village benefits from excellent road connectivity to Coventry and the A46, although the corollary is that the A428 passes through the village. There is Green Belt sensitivity given proximity to Coventry, and there is also biodiversity sensitivity given nearby ancient woodlands. Primary school capacity is not thought to be an issue in that there is existing capacity and/or potential for expansion. Binley Woods has an overall settlement score of 47, such that it is the second best served village.
- 5.4.27 At the Draft Plan stage there were no proposed allocations; however, the new proposal is to allocate Oakdale Nursery, Binley Woods (**Site 54**; 43 homes). The Site Assessment Topic Paper (2025) concludes:

“The site is adjacent to existing development, although it is removed from the Binley Woods and Brandon settlement boundaries. The main constraints relate to ecology which would require some mitigation to minimise adverse impacts on habitats adjacent to the site. There are Medium/Low landscape constraints. Part of the site also comprises standing water. Part of the site is provisionally identified as Grey Belt... It has a relatively high connectivity score and access via non-car modes would be feasible to services in Binley Woods such as the primary school. It is located alongside existing residential development and is partially previously developed land.”

- 5.4.28 The equivalent discussion within the Interim SA Report at the Draft Plan stage did not flag this site as the best performing omission site (rather, it flagged Site 45, which is discussed below) and ultimately the site was not progressed to the RA growth scenarios at that stage. The report explained a concern that development “*would involve ribbon development along the A428 reducing the landscape gap to Brandon / Wolston.*” However, at the current time, in light of the new evidence / analysis, it is fair to conclude that this is a reasonably strongly performing site. This being the case, and because it is a fairly modest sized site, there is not considered to be a need to test the option of ‘non-allocation’ through the RA growth scenarios, i.e. it is progressed as ‘constant’.
- 5.4.29 There is not considered to be a strong strategic case for higher growth scenarios, including given the modest residual need for greenfield allocations after having considered supply from allocations at Rugby, and because there are not known to be any village-specific opportunities to be realised by higher growth. However, it is nonetheless appropriate to give brief consideration to select omission sites.
- 5.4.30 In this regard, a first port of call is potentially **Site 45**, which is a large site to the north of the village, however: achieving good access would be challenging; the A428 is a barrier to reaching the primary school; there would be a concern regarding achieving effective containment; the site is safeguarded for minerals extraction; and there is generally little strategic case for growth at this scale at Binley Woods (the village would benefit from new community infrastructure, for example a neighbourhood hub, but this would not be an appropriate location given it is separated from the village to the south by the A-road).
- 5.4.31 There is also a need to consider growth quantum from a primary school perspective, i.e. seek a modest quantum that can be accommodated in existing capacity or a large quantum that can fund an expansion. In this regard, it is noted that the consultation response received from the site promoter in 2025 pointed out that the landowner has control of all land between the village and the B4428 to the north, such that there is potentially the option of strategic scale growth. There is no clear case for this at the current time (and it is not actively being promoted), but it is worth highlighting given that this is an important sector of land to the east of Coventry (and noting proposed and potential employment land growth locations to the north and south).
- 5.4.32 Another omission site of note is then **Site 34** which is being actively promoted for housing, but which is supported for a community use, namely the restoration of Coventry Stadium for speedway and stock car racing and other motor sports together with other community uses (an element of enabling housing could feasibly be explored). This site is ruled out through the HELAA, such that it is not considered within the Site Assessment Topic Paper, but still warrants mention here, noting active promotion.
- 5.4.33 A final possibility is the sector of land to the south of the village, where the land has not been made available, but development could be relatively well contained in landscape / Green Belt terms. However, it appears that achieving good access (for cars and pedestrians/cyclists) would be highly challenging, plus there is biodiversity constraint.
- 5.4.34 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating one site for 43 homes.

Brinklow

- 5.4.35 Brinklow is a historic rural village located centrally between Coventry and Rugby and not very well linked by road, although there is good access to existing and proposed strategic employment sites to the west (Ansty Park and Walsgrave Hill). There is a designated conservation area and a large scheduled monument (Brinklow Castle).
- 5.4.36 There is limited strategic case for growth; however, there is one notably strongly performing site, namely West Farm and Home Farm, Brinklow (**Site 337**; 75 homes), which is a proposed allocation as per the Draft Plan stage. The site is predominantly PDL, well-contained in the landscape and adjacent to the village centre. There is historic environment sensitivity as the edge of the site includes a Grade II listed farm building and intersects the conservation area, and biodiversity constraint is a further consideration as the northern edge of the site comprises a LWS, but there is good potential for avoidance / mitigation.
- 5.4.37 The other proposed allocation is also retained from the Draft Plan stage but with a new reduced capacity, namely Land south of Rugby Rd, Brinklow (**Site 315**; 250 homes).
- 5.4.38 The Site Assessment Topic Paper concludes:
- “The site comprises arable fields and agricultural infrastructure situated at the southern fringe of Brinklow. The surrounding road network has medium levels of congestion, and the site has relatively weak assessed accessibility and connectivity. However, this reflects the score of a wider area and the site is walkable to services and facilities in the village. The site has medium ecological sensitivity and medium landscape sensitivity. There are greater potential heritage sensitivities. The site contains no designated heritage assets but lies immediately south of Brinklow Conservation Area. The field features ridge and furrow earthworks, that are remnants of historic agricultural practices, and contributes to the setting of the conservation area, Brinklow Castle, and the nearby grouping of historic farmsteads and agricultural buildings. The site provisionally lies in the Grey Belt. There is scope to mitigate against archaeological heritage constraints by restricting development to the western field which borders Heath Lane. This also reduces impacts on the setting of the conservation area and Brinklow Castle. To achieve this, the capacity of the site would be reduced.”*
- 5.4.39 The new proposed approach of leaving the eastern field within the site boundary undeveloped will arguably lead to a somewhat incongruous built form, but the logic is clear in terms of minimising heritage impacts and protecting the village character. It is not thought that the effect of reducing the site capacity will be to impact development viability, e.g. with implications for affordable housing or infrastructure delivery. The Interim SA Report previously noted that *“as a larger site that is flat and largely free from constraints there should be good development viability with positive implications for affordable housing delivery. The site could deliver some limited benefits to the village, to include a children’s play area...”*
- 5.4.40 Overall, whilst Site 334 was identified as a marginal proposed allocation at the Draft Plan stage such that it was a ‘variable’ across the RA growth scenarios, at the current time it is considered to perform sufficiently well such that it can be progressed as a ‘constant’. New understanding that land surrounding Brinklow is grey belt feeds into this, and this decision is taken notwithstanding the lack of a village primary school.¹⁹

¹⁹ The school site is split between Brinklow and Monks Kirby (~5km distant), but primarily at Monks Kirby (with only reception at Brinklow). This is a non-ideal situation, but there is a desire to support the Monks Kirby school site, which has capacity, rather than seeking to deliver a new school at Brinklow (which, in any case, would require a large quantum of growth, and likely a large strategic site). The school at Monks Kirby can likely be expanded if necessary.

Figure 5.11: Ridge and furrow within Site 334 and across the wider area²⁰



- 5.4.41 There is not considered to be a strong strategic case for higher growth scenarios, including given the modest residual need for greenfield allocations after having considered supply from allocations at the settlements discussed above, and because there are no known village-specific growth opportunities to be realised. However, it is nonetheless appropriate to give brief consideration to select omission sites.
- 5.4.42 Specifically, two further options of note are **Site 24** and **Site 111**; however, the former is not well-contained in landscape / Green Belt terms and this sector of land may contribute to the setting of the conservation area, whilst the latter site was deleted as an allocation by the Inspector at the final stage of preparing the adopted Local Plan (see a detailed discussion across paragraphs 204 to 214 of the Inspector's Report).
- 5.4.43 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating two sites for a total of 325 homes.

Clifton-upon-Dunsmore

- 5.4.44 There is a strategic case for growth here as a Main Rural Settlement located outside of the Green Belt and well-linked to Rugby. However, the village has a relatively low settlement score (36).
- 5.4.45 The proposed approach is unchanged from the Draft Plan stage, namely allocation of three sites all located to the north of the village. The following bullet points provide an overview that is unchanged from the Interim SA Report at the Draft Plan stage:

²⁰ Sourced from the consultation response received from the promoters of Site 334.

- **Site 202** (80 homes) – is potentially the strongest performing of the three sites, as it is separated from the conservation area, generally well located in built form / landscape terms (although there is a need to question whether the site should utilise the entire field, with a view to a comprehensive scheme) and, as a larger site, is able to deliver transport upgrades and a children's play area.
- **Site 129** (60 homes) – is located nearby to the east and, like Site 202, benefits from being a relatively flat site. Farm buildings located to the north may provide a degree of containment, but the conservation area is adjacent to the west, and there is poor containment to the south, where Site 83 is being promoted for 180 homes (and open space). Site 83 is also potentially sensitive in that it comprises the former landscaped grounds of Clifton Hall (albeit not listed; see historic mapping).
- **Site 307** (10 homes) – is a more challenging site as it is located to the west of the village, where the landscape falls away towards the Avon Valley. As a small site there are limited concerns, and site specific policy is set to require *“solely rear gardens along the western boundary of the site would not be supported to enable a more attractive settlement edge”*, but it is noted that a larger area of land has been promoted as available, and so there is a need to plan with a long term perspective. Access is on a bend on a minor residential road but is judged to be suitable.

- 5.4.46 These sites in combination would deliver 150 homes and, at the Draft Plan stage, the Interim SA Report explained that this was understood to be *“broadly the number of homes that can be accommodated without breaching the capacity of the village primary school, which is unable to expand.”* The latest situation in respect of primary school capacity is explained in the Education Topic Paper (2025) as follows:

“Clifton-upon-Dunsmore CofE Primary School is... shown to have more demand for places than there are available places, however there remain a surplus of places in the wider Rugby North Central Primary School Place Planning Area of which the school forms part. Demand is projected to exceed available places by circa 50 places across year groups R-6 in the 2030s.

[The school] drew only 46% of its children from Clifton, Newton and Churchover Ward in 2022-23 and 45% in 2024-25. The remaining children were largely drawn from wards within the Rugby urban area. The priority area for the school is largely coterminous with Clifton upon Dunsmore and Newton and Biggin parishes and lies wholly within the Clifton, Newton and Churchover Ward. The homes planned at Newton Manor Lane on the edge of Rugby while lying within the ward, do not lie within the priority area for the school but are instead within priority area for Boughton Leigh Junior School in Brownsover. This means that the information presented in the model likely shows a worst case scenario in terms of future demand.

Notwithstanding that, it is clear that there is potential... for more children to be admitted to the school from Clifton upon Dunsmore village, as more homes are built there, with a corresponding reduction of children admitted from beyond the priority area. For this reason... new homes being built in the village are likely to reduce home to school transport needs. However, this does also support the view taken by Warwickshire County Council that the number of homes in the village should be restricted to avoid tipping the balance and creating the need for children to be bussed out of the village to attend other primary schools, bearing in mind that Clifton-upon-Dunsmore CofE Primary is single form of entry school.”

- 5.4.47 Overall, and in line with the approach taken at the Draft Plan stage, there is not considered to be a reasonable need to explore a lower growth scenario. Another consideration is that growth at the village can assist with delivering Local Cycling and Walking Infrastructure Plan (LCWIP) Route 47 (park connector between Coton Park and Clifton upon Dunsmore) which connects to Rugby Station and the town centre.
- 5.4.48 Equally education capacity serves as an argument against higher growth. However, there is a need to consider possible alternative approaches to delivering ~150 homes.
- 5.4.49 In this regard, the following text from the Interim SA Report still broadly holds true:

*“The next port of call is then the option of expansion to the southwest of the village, where the land owner has proposed a large site for 700 homes to include a new primary school (**Site 238**), but has also proposed two smaller options, involving around 350 or 150 homes. The first thing to say is that there is no case for the middle option, including on the grounds of primary school capacity. With regards to the largest option (**Site 238**), this may warrant ongoing consideration, however: there is no clear strategic case for growth at this scale; there would be relatively poor links to the existing village; there would be landscape impacts (including noting a public footpath linking the village to the Clifton Brook / Oxford Canal corridor); and there would be a need to carefully consider performance in terms of transport and traffic factors (noting seemingly no potential to link directly to the new Houlton Way).*

*As such, attention focuses on the 150 home option (**Site 335**), which could be delivered in place of the three emerging preferred allocations discussed above (**Sites 129, 202, 307**). The views of the Parish Council and others on these two alternative approaches to growth at the village are welcomed through the current consultation; however, at the current time it appears that the emerging preferred approach (**Sites 129, 202, 307** to the north) is clearly preferable to the alternative of **Site 335** to the southwest. This is largely on landscape grounds, given Clifton-upon-Dunsmore’s characteristic hilltop location, but it is also the case that the site does not relate very well to the village (although the school and village centre would be within reasonable walking distance, plus the site is relatively well linked to Rugby), plus there would be a concern regarding further piecemeal growth to the east over time, leading to opportunities missed to secure infrastructure benefits alongside delivery of new homes.”*

- 5.4.50 The latest situation is: A) the Parish Council’s consultation responses received in 2025 objected to the proposed allocations but also did not support **Site 335** as an alternative approach; B) **Site 335** has been assessed as having ‘medium’ landscape sensitivity, C) a planning application has now been submitted (<https://www.rugbyroad.co.uk/>); and D) the proposed submission approach is to designate a settlement gap to Rugby.
- 5.4.51 A final omission site of note is then **Site 83** to the east, which has already been noted above in that it is located adjacent to **Site 129**. The site is being actively promoted, with a detailed consultation response having been received in 2025, but the Site Assessment Topic Paper concludes: *“The principal sensitivities relate to landscape and heritage. The site is in close proximity to two grade II listed buildings: The Old Hall and Clifton Manor. The site is an important element of the eastern gateway to/from the village, providing a rural backdrop to the conservation area and its listed buildings.”*
- 5.4.52 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating three sites for a total of 150 homes.

Dunchurch

- 5.4.53 Dunchurch is a historic village closely linked to an expanding Rugby and the M45/A45. The committed SW Rugby strategic urban extension is nearby, and a focus of detailed work has been on ensuring a landscape gap to Dunchurch and avoiding traffic impacts / realising transport opportunities. As discussed, Dunchurch has a high settlement score.
- 5.4.54 At the Draft Plan stage there were two proposed allocations, namely Homestead Farm Dunchurch (**Site 90**; 30 homes); and Land south of Coventry Rd, Dunchurch (**Site 341**; 180 homes) and, of these two sites, **Site 341** was identified as a somewhat marginal allocation such that it was explored as a variable across the RA growth scenarios.
- 5.4.55 The Interim SA Report introduced these two sites as follows:
- “There is broadly a case to be made for focusing growth to the west of the village given... sensitivities to the east of the village... a first port of call is **Site 90**, which is considered to be a strongly performing site... **Site 97** is then a large irregularly shaped site, where three options have been considered: development in full for 360 homes, with access from both the B4429 and Sandford Way (a residential road at the western edge of the village); B) a smaller scheme with access solely from Sandford Way (**Site 41**); and C) a 180 home scheme with access from the B4429 (**Site 341**).*

... On balance Site 341 is preferred, because Sandford Way is not suited to significant additional traffic, and also noting a surface water flood zone at the western edge of Dunchurch. However, the proposed scheme (in combination with Site 90) would extend Dunchurch west along the B4429, and there is a need to ensure a comprehensive approach to growth, i.e. avoid a situation whereby there is ongoing pressure to develop the remaining parts of Site 97, with a resulting piecemeal development with opportunities missed to maximise infrastructure benefits..."

- 5.4.56 At the current time the new proposed approach is to delete both of these allocations, particularly accounting for the sensitivities relating to nearby SW Rugby. However, it is reasonable to explore the possibility of allocation via the appraisal of RA growth scenarios, particularly given Dunchurch's location outside of the Green Belt and its high settlement score. There is a case for supporting a more modest scheme within Site 341, due access challenges, but on balance a 180 home scheme is assumed.
- 5.4.57 There is very little strategic case to be made for exploring further higher growth scenarios, but a key matter for ongoing consideration is ensuring a comprehensive approach to any growth to the west of the village, where: A) land directly to the west of the village, including Site 90 and site 341, has been promoted as available for residential development; and then B) sites further to the west, adjacent to the M45 junction, are being promoted for employment (including Sites 18 and 133 discussed in Section 5.2).
- 5.4.58 The furthest west of the sites being promoted for residential is **Site 42**, with the site promoter for this site having submitted consultation response in 2025 stating that the land is available for residential and not to deliver open space as part of a comprehensive strategic allocation (which is something that has been previously proposed as part of a concept masterplan for comprehensive growth). This serves to highlight the importance of giving strategic consideration to growth in this area with a long term perspective.
- 5.4.59 Final points to note regarding omission sites are:
- **Site 37** is a notable site option to the east of the village, but this is a sloping site with the parish church / conservation area uphill to the west, plus achieving good access onto the B4429 could prove challenging.
 - There are two small available sites to the north of the village, namely **Site 38** and **Site 74**. However, these sites are constrained in historic environment terms, as they are located adjacent to / either side of the historic gatehouse and tree-lined drive for Bilton Grange, which is a Grade II listed Registered Park and Garden.
 - A large area of land is available to the east of the village (**Site 91**), but strategic growth in this area is not supported including given topography / landscape factors and proximity to SW Rugby, which has faced delivery challenges.
 - Two new settlement options are being promoted to the south of Dunchurch.
- 5.4.60 In conclusion, there are **two reasonable growth scenarios** for Dunchurch:
- 1) The proposed submission approach (nil allocations)
 - 2) Allocation of two sites for a total 210 homes

Long Lawford

- 5.4.61 Long Lawford is located in the Green Belt near adjacent to the west of Rugby. There is a historic core to the north of the railway line at the western extent of the village (but just two listed buildings and no conservation area) and then the village has expanded east (towards Rugby) and also to the south of the railway line over recent decades, including significant growth over recent years. The village has a settlement score of 38, which is 'middling' amongst the main rural settlements but there is good primary school capacity.
- 5.4.62 Firstly, there is a new proposed urban allocation for 5 homes (**Site 172**).

- 5.4.63 With regards to greenfield sites, at the Draft Plan stage there was one proposed allocation, namely Land at Long Lawford (**Site 316**; 400 homes), which was identified as a somewhat marginal allocation such that it was explored as a variable across the RA growth scenarios. The Interim SA Report introduced the site as follows:

“... four overlapping parcels of land have been considered, but the preferred configuration of growth is Site 316, which could deliver 400 homes. There would be the potential to deliver some targeted new community infrastructure, to include a small convenience shop and potentially land for a GP surgery, and it is understood that there is good potential to deliver a pedestrian crossing across the A428 and a high quality active travel link to the village centre via the site that is currently under construction near adjacent to the north. Rising topography to the south would assist with securing a degree of containment in Green Belt terms, but the situation is nonetheless challenging in this regard, noting that the site boundary does not align with field boundaries.”

- 5.4.64 The latest situation is that the site will likely not deliver a GP surgery, but a new community space could be used for a pharmacy. Also, the latest situation is that there is understood to be a degree of heritage constraint given an adjacent listed farmstead.

- 5.4.65 The Interim SA Report then also gave close consideration to **Site 253**, which is located adjacent to the east of Site 316, but ultimately this site was ruled out, i.e. was not progressed to the RA growth scenarios. The Interim SA Report explained:

“Site 253 to the east is then considered to perform less well for two reasons, namely: 1) Green Belt noting that this land is not likely to comprise Grey Belt on the basis of contributing to avoiding the sprawl of Rugby as a large built-up area; and 2) the site would not link as well to the village centre. However, it is recognised that the site has been promoted for just 150 homes, with extensive land made available for green / open space and a primary school (but there is no clear need for a new school here).

... With regards to comprehensive growth involving [Site 316 and Site 253], this is ruled out... on balance. There is no clear case for large-scale growth of this nature at Long Lawford although, on the other hand, it is recognised that allocation of Site 316 would likely increase pressure for additional allocation of Site 253 down the line.”

- 5.4.66 At the current time the new proposed approach is to allocate both Site 316 and Site 253, with a view to comprehensive rather than piecemeal growth and because growth detailed work since the Draft Plan stage has shown the option of growth here to perform well in transport and accessibility terms. In particular, there is good bus connectivity and development should be able to deliver enhanced walking and cycling connectivity into Rugby, including to the town centre and to a secondary school.

- 5.4.67 However, an issue is that the land is within the Green Belt and has mostly found not to comprise grey belt. As such, there is a need to test the option of nil growth at Long Lawford, as per the approach taken at the Draft Plan stage.

- 5.4.68 A further consideration is that Site 253 has also been promoted to deliver some employment land adjacent to the west of Rugby. This is an option to consider, with a view to comprehensive growth and potentially with a view to delivering on employment land objectives, but a key concern is impacting the Green Belt gap to Rugby. Figure 5.11 shows Site 316, recalling that Site 253 is adjacent to the east, and it can be seen that a modest scheme within Site 253 will benefit from topography providing a degree of containment, with raised ground to the east then maintaining a gap to Rugby.

- 5.4.69 There are no further omission sites of note and so, in conclusion, there are **two reasonable growth scenarios** for Long Lawford:²¹

1) One allocation for five homes

2) The proposed submission approach (three sites for a total of 655 homes)

²¹ With regards to further omission sites, the Interim SA Report explained: *“Attention focuses on land to the south of the village, with no significant sites having been promoted as available to the north (and it is noted that there is a flood risk zone to the north west, whilst land to the north comprises a sensitive landscape associated with Holbrook Grange and the River Avon...)”*

Figure 5.12: Site 316 and the context of topography in the Long Lawford area

Ryton-on-Dunsmore

- 5.4.70 The village is located on the A45 well-linked to Coventry and extensive employment land, plus further employment land in this area is an option at the current time (discussed below). The village including its historic character is heavily affected by the A45, although there is a prominent Grade II* parish church.
- 5.4.71 At the Draft Plan stage there was one proposed allocation, namely Land at High St, Ryton-on-Dunsmore (**Site 100**; 37 homes) and this is unchanged at the current time. This was considered a strongly performing site at the Draft Plan stage such that allocation was a 'constant' across the RA growth scenarios. The Interim SA Report introduced the site as follows:
- "... designated as a Local Wildlife Site (LWS) but also an identified reserve site for housing in the made Ryton-on-Dunsmore Neighbourhood Plan (2021). Also, there is recent planning history, with an application recommended for approval but then refused at committee on the ground of car parking. The site is otherwise very suitable for development, given built form along three of its edges and woodland along the final edge, and is an emerging preferred option at the current time."*
- 5.4.72 At the current time it is considered a very strongly performing site in that it is identified as 'suitable' within the HELAA and, in turn, not discussed in the Site Assessment Topic Paper. It is once again progressed to the RA growth scenarios as a constant.
- 5.4.73 With regards to higher growth scenarios, there is limited strategic case given supply from allocations at the settlements discussed above, and another consideration is that Ryton-on-Dunsmore is located in proximity to Coventry such that Green Belt Purpose A is a consideration, i.e. there is potential for land around the village not to be grey belt.
- 5.4.74 However, there are some options to consider, with the Interim SA Report having explained matters as follows:

*"Attention focuses primarily on land to the south of the A45, but briefly north of the A45: **Site 71** to the west is being promoted for employment (given a location opposite Prologis Park); and it is difficult to envisage expansion to the east given a flood risk zone, a large LWS and the parish church. There is, however, the possibility of employment land to the east of Ryton / north of the A45..."*

The other main non-committed site that has been promoted as available and is in contention for allocation is then Site 29 (63 homes) but achieving access would involve demolition of two homes. Also, there would be merit in considering this site in conjunction with land to the east, which has not been promoted as available, but which potentially represents the primary residential expansion option for the village. Across Site 29 and land to the east there appear to be several land ownership parcels.

Furthermore, as part of any residential expansion to the east there would be a need to consider the future of Site 305, which is located adjacent to the north and which comprises a Grade II listed Registered Park and Garden, namely Ryton House. The Grade II listed house is in ruin, and the grounds are in poor condition, such that the Registered Park and Garden is on the national Heritage at Risk Register and its vulnerability is classified as “high” (with a statement that its “future is uncertain”).

The site has previously been promoted as available, but it is not clear that it is currently actively being promoted for residential, with its current owner understood to be a scrap metal company. The made Neighbourhood Plan supports only heritage-led “sympathetic limited development”.

5.4.75 The Interim SA Report went on to conclude the following regarding higher growth:

“[The most significant] question is the possibility of strategic expansion to the southeast, including noting the possibility of heritage enhancement and strong landscape / Green Belt containment. This is not currently a reasonable option to explore, including given land availability, but is a potentially a matter for ongoing consideration (as part of which primary school capacity would need to factor-in, with it being the case that there is some existing headroom capacity, but seemingly no potential for expansion). It is also noted that the village currently has quite a low settlement score (36), such that growth aimed at delivering targeted new community infrastructure [might] be an option...”

5.4.76 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating one site for 37 homes.

Stretton-on-Dunsmore

5.4.77 The village is located to the east of Ryton-on-Dunsmore, near equidistant between Coventry and Dunchurch, and benefits from having good access to the A45 but being slightly set back from the road. There is a conservation area at the southwest extent but also a wider area with historic character. Primary school capacity is an issue, as discussed in Section 5.2 (also as previously discussed in the Interim SA Report).

5.4.78 The current proposed approach is a modest evolution from the approach at the Draft Plan stage, with the new approach involving four allocations for 113 homes rather than four allocations for 168 homes. Specifically:

- Land E of Fosse Way, Stretton-on-Dunsmore (**Site 6**; 3 homes) – is unchanged.
- Land west of Fosse Way, Stretton-on-Dunsmore (**Site 81**; 40 homes) – is also unchanged; however, this decision was reached only having given detailed consideration to potential archaeological constraint. The Interim SA Report considered it to be a strongly performing site as: *“It relates well to the settlement edge, has the potential to be quite well-contained given a mature / historic field boundary, and the proposal is to deliver a significant new area of... greenspace.”*

On the latter point, it can deliver 2.3 ha of greenspace within a 3.5 ha site.

- The Croft, Stretton-on-Dunsmore (**Site 348**; 70 homes) – this is a newly submitted site, and the proposal is now to allocate this site in place of **Site 134**, which is adjacent and was previously an allocation for 125 homes at the Draft Plan stage.

5.4.79 There is a clear logic to this new approach because Site 348 has better access than Site 348, which would be accessed from a lane with a rural character and would result in traffic passing through the village. However, ensuring a comprehensive approach to growth in this sector of the village warrants ongoing consideration. The Interim SA Report previously stated the following in respect of Site 134:

“There is an adjacent existing permitted site, and, in this context, Site 134 should be able to deliver a well-rounded new settlement edge. However, there is a slight concern regarding further piecemeal expansion... [there is] a need to ensure that growth is... undertaken with a long term perspective, with a view to maximising opportunities to secure investment in infrastructure and the benefits of growth...”

- 5.4.80 Other than Site 134, one other omission site of note is **Site 26** (34 homes), in respect of which the Interim SA Report explained: *“[It] arguably relates very well to the settlement edge (unless the aim were to be to retain / enhance a green wedge in this area, noting the proposal above regarding a new public open space within Site 81, two public rights of way and generally a high density of historic field boundaries in this area). However, an issue is that access would need to be achieved by crossing a small brook.”* The Site Assessment Topic Paper (2025) reinforces concerns: *“There are significant flow paths on the access road... including depths of 0.6 to 0.9m for 1 in 30- year events”.*
- 5.4.81 Overall, whilst there is a village-specific case for testing a higher growth scenario involving additional allocation of Site 134 (provisional grey belt is another factor), there is limited wider strategic case (given supply from allocations at other settlements discussed above), and there is also a need to consider the primary school constraint. In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating three sites for a total of 113 homes.

Wolston

- 5.4.82 Wolston is a historic village closely associated with the Avon valley (along which there is a concentration of higher quality agricultural land). It is located to the east of Coventry, but unlike other villages in this area (Binley Woods, Ryton-on-Dunsmore and Stretton-on-Dunsmore) Wolston is not directly linked to an A-road. There is, however, a good local offer such that the village has a high settlement score (45).
- 5.4.83 The preferred approach at the Draft Plan stage involved just one small allocation, namely Dyers Lane, Wolston (**Site 39**; 15 homes), with the Interim SA Report stating: *“This is considered to be a strongly performing site, and it is also noted that there is the potential to bring the site forward as self-build housing or for older persons housing.”*
- 5.4.84 With regards to higher growth scenarios, the Interim SA Report explained: *“There are several site options that are potentially suitable for allocation when viewed in isolation, but the Interim a major issue affecting the village is primary school capacity. Specifically, there is no capacity at the school and likely no potential for expansion, such that directing growth to the village would mean that children need to travel to primary school at Ryton-on-Dunsmore or Binley Woods.”*
- 5.4.85 The situation is broadly unchanged, with modelling work undertaken subsequent to the Draft Plan stage (assuming allocation of Site 39) leading to the following conclusion (as set out in the Education Topic Paper, 2025): *“Wolston St Margaret CofE Primary School is not projected in the model to exceed capacity, but remains close to capacity... In both 2022-23 and 2023-24, 87% of children at the school were resident in Wolston and The Lawfords Ward. The priority area for the school lies entirely within the ward. This indicates that there is limited capacity for this school to accommodate children from new housing in Wolston by shrinking the area from which it admits children to focus on the priority area. This is further likely to be the case if there is ‘push back’ from Knightlow CoE Primary School due to new housing in Stretton-on-Dunsmore, as discussed above... This supports the advice received from Warwickshire County Council that there is very limited additional capacity for the children from new housing in Wolston to attend the village school.”*
- 5.4.86 However, there is now an additional proposed allocation, namely North of Warwick Rd, Wolston (**Site 136**; 80 homes). The Interim SA Report flagged this as “the next port of call” should the primary school issue be addressed, and otherwise the site is subject to limited constraint, albeit it would extend an already linear built form.

- 5.4.87 The site promoters submitted detailed analysis through the Draft Plan consultation questioning the primary school constraint, but latest situation is that the site will be delivered as specialist accommodation for those aged over 55 or shall *comprise bungalows with two or fewer bedrooms*. The implication is allocation generates limited or no additional pressure on the school; however, additional pressure placed on local GP services is potentially an issue, with the NHS Integrated Care Board stating:

“Wolston – this practice is in a rural location, with very limited expansion opportunities... there is a suggestion that the housing could be specialist older persons housing which is a concern, noting the wider health and social care needs of these residents...”

- 5.4.88 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating two sites for a total of 95 homes.

Wolvey

- 5.4.89 Wolvey is a notably small main rural settlement with a low settlement score (36) and is also notable on account of being located in the north of the Borough, linking much more strongly to Hinckley, Nuneaton and Coventry than to Rugby. It is a historic village associated with the River Anker, and there is a small conservation area, but the conservation area includes just one Grade II listed building, and the village as a whole contains just three listed buildings. The village is distant from an A-road, similar to Brinklow, although Brinklow is more constrained in historic environment terms.

- 5.4.90 At the Draft Plan stage Wolvey stood out as the village assigned strategic growth, including with the view to delivering on village-specific objectives (a primary school expansion, a neighbourhood hub and an improved bus service). Specifically, the proposal was to support strategic growth to the south of the village and also allocations to the west and north east. However, following consultation the significance of the village-specific growth opportunity is questionable. Also, within the Interim SA Report, there were some concerns raised with the option of expanding the village to the south east in terms of ensuring containment / minimising the risk of long term sprawl.

- 5.4.91 The new proposal is to support significant growth involving 210 homes from allocations rather than strategic growth involving 710 homes. Specifically:

- South – there is no longer support for strategic growth here, namely **Site 96** (500 homes), but a modest part of previously proposed Site 96 is retained and proposed for 60 homes (**Site 358**). The new proposed site relates well to the village built form but there is no southern boundary (i.e. the site comprises part of a wider field), such that there is potentially a risk of pressure for future sub-optimal development creep / piecemeal expansion with opportunities missed to achieve planning gain.
- West – Land North of B4109, Wolvey (**Site 309**; 150 homes) is unchanged from the Draft Plan stage. The Interim SA Report explained: “... *this is arguably the best performing site because it is subject to limited constraint and is well-contained in landscape / Green Belt terms. However, the site would deliver limited benefits beyond new homes (river corridor enhancements should be explored).*”

A further consideration is biodiversity constraint highlighted by the Wildlife Trust through consultation in 2025, but the Ecological Assessment flagged few concerns. It is noted that whilst the site is being promoted for 190 homes the proposed allocation is for 150 homes, which could suggest some additional opportunity for green and/or blue infrastructure. This is a matter for further consideration, noting that the concept masterplan submitted by the site promoter shows very little land for green blue infrastructure along the boundary with the river corridor.

- North east – **Site 84** was previously proposed for 60 homes but is now deleted for a relatively clear cut reason. Specifically, whilst there is a direct walking route linking to the village centre this is via a river corridor such that it cannot be considered a year-round walking route. The Interim SA Report explained:

“The next-best site [after Site 309] is then potentially Site 84 to the northeast (60 homes). There is a very strong proposal to develop only a small proportion of this site, with the bulk of the site delivered as an area of riverside parkland and a play area, and the village would certainly benefit... However the housing area would deliver a ‘phase 2’ of a scheme currently under construction (such that the question arises as to whether even greater benefits to the village could have been secured if the two phases had been planned for comprehensively), does not relate well to the settlement edge and would not be well-contained in landscape / Green Belt terms.”

- 5.4.92 Overall, the new proposed lower growth approach is supported, given the context of a reduced need to identify greenfield allocations, and given the greenfield options discussed above, including at Long Lawford where there is a much stronger case to be made for growth in transport and accessibility terms. Without a clear village-specific growth opportunity the case for strategic growth at Wolvey reduces considerably. Also, the Water Cycle Study (WCS, 2025) discusses a water supply constraint at the village.
- 5.4.93 The Interim SA Report did flag the proposal for strategic growth to the south of Wolvey as questionable, such that it was a variable across the RA growth scenarios, albeit there was also support for the scheme in some respects, for example with the report stating: *“The site is not very well-contained... but as a large site there should be good potential to work with land-owners on site masterplanning to ensure a comprehensive scheme.”*
- 5.4.94 With regards to possible higher growth scenarios, the village built form suggests limited further opportunities; however, the Interim SA Report discussed two modest options.²²
- 5.4.95 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating two sites for a total of 210 homes. Strategic growth to the south is now ruled out as unreasonable given strategic, village-specific and site-specific factors

Rural villages

- 5.4.96 The proposed approach was (at the Draft Plan stage) and remains not to allocate at any of the rural villages other than Newton, which has been discussed above as something of an exception, in that it relates very closely to Rugby. Whilst Section 5.4 of the Interim SA Report briefly considered the possibility of one or more allocations at a rural village the broad strategic case is now reduced, and it is equally the case that consultation and subsequent evidence gathering has not served to highlight any village-specific growth opportunities that are significant enough to potentially warrant an allocation.
- 5.4.97 The equivalent text from the Interim SA Report is represented here:

“The limited strategic case for allocation at rural villages has already been introduced in Section 5.2, and this limited strategic case is now even clearer after having considered supply options at higher order settlements here within Section 5.4.

However, it is recognised that: A) certain rural villages have a higher settlement score than others; B) certain villages may be associated with a strategic case for modest growth to meet localised housing needs, deliver targeted infrastructure and/or to generally help to maintain village vitality; and C) there are a number of available site options that are suitable when viewed in isolation, i.e. blind to the strategic context.

Overall, attention focuses on:

- *Church Lawford – is located on the A428 and has limited historic environment sensitivity. There are three available site options and the southern two appear reasonably unconstrained and well-linked.*

²² *“Firstly, Site 107 (10 homes) is peripheral to the village (but close to Site 84) and may have some sensitivity a location at the junction of two historic roads (see historic mapping, which also suggests potential archaeological sensitivity), noting dense field boundaries and given the nearby river corridor. Secondly, Site 104 (~15 homes) would involve demolition of a house to achieve access but might alternatively be considered as part of a comprehensive scheme linked to Site 96.”*

- *Shilton – there is the potential for significant growth to the north of the village at Site 56 (e.g. increasing the size of the village by 50% or more), but there is no clear strategic case for this. A small scheme could be delivered within Site 56 (namely Site 313) but then there would be a risk of further piecemeal growth over time with opportunities missed to secure benefits to the village.*
- *Birdingbury – a notably rural village in the south of the Borough. Site 116 appears to be notably unconstrained and well linked to the village / well contained...*

Overall, whilst there are options warranting further ongoing consideration there is no clear reasonable growth scenario involving allocation at any of the rural villages at the current time. There will be the potential to add one or more rural village allocations prior to plan finalisation should this be deemed appropriate in light of consultation responses received, including from parish councils."

New settlement options

- 5.4.98 The primary new settlement option is Lodge Farm (**Site 73**), which has already been introduced above. To recap, whilst it was an omission site at the Draft Plan stage it was explored as a variable across the RA growth scenarios.
- 5.4.99 There is also a planning history going back further, in that the site was an allocation in the adopted Local Plan until it was removed by the Inspector, whose report explained:
- "In conclusion, the allocation would have relatively poor accessibility, particularly by non-car modes and in comparison with the other large scale allocations in the Plan. It would also be likely to have significant adverse effects on the landscape, again to a greater degree than is likely with the other allocations of comparable size, and cause less than substantial harm to the significance of heritage assets. Notwithstanding the justification set out in the Plan and the supporting evidence, there is not currently a need for this allocation to meet the Plan's housing requirements. Indeed without it the Plan provides for an excess of housing land supply over the identified requirement of more than 17%. In the light of this, I find that the harm likely to be caused by development... would not be outweighed by the benefits."*
- 5.4.100 The Inspector's Report also says much more besides, and the great majority of the concerns raised remain entirely applicable at the current time. However, understanding has moved on regarding some of the matters discussed, in particular regarding infrastructure delivery opportunities and also bus service opportunities. It should also be noted that matters did not transpire as anticipated in the following regard:
- "In terms of its contribution to the borough's infrastructure requirements, I understand that the Lodge Farm development could [make] a contribution to the costs of the proposed new secondary school and spine road at South West Rugby. However... the SWR development on its own would be viably able to deliver the full strategic transport and education requirements necessary to support that development, including the spine road network and Homestead Link around Dunchurch. Therefore, the Lodge Farm allocation is not needed to support of the infrastructure requirements of the borough."*
- 5.4.101 The Interim SA Report introduced Lodge Farm as follows:
- "Whilst the Inspectors Report for the adopted Local Plan (2019) raised a wide range of issues, it is acknowledged that the site promoter has subsequently undertaken work to explore ways to address issues / better realise opportunities and, as part of this, is now proposing a considerably larger / more comprehensive scheme.... [which] could deliver a secondary school, although a new school at this location [has limited strategic rationale]. Also, a larger scheme would assist with securing a high quality bus service between Rugby (SW Rugby SUE) and Daventry via Lodge Farm and Dunchurch, which is an important consideration, although major concerns would still remain regarding how to avoid problematic traffic through Dunchurch."*

- 5.4.102 A new vision document was then received from the site promoters in May 2025, and a headline is a proposal to bill Lodge Farm as: “Rugby Borough’s new infrastructure led community”. However, the issue is development viability, as has already been discussed above in Section 5.2, with the headline conclusion being that “*Lodge Farm is a long way from being a viable proposition even at 0% affordable housing.*” It is recognised that this calculation is on the basis of key assumptions regarding delivery of a bypass as part of any new village (rather than the A45 passing through the centre of the village), at a cost of £30m, and contributing £61m for a significant upgrade to the Thurlaston interchange (likely comprising grade separation); however, these are considered reasonable assumptions. Nationally local plans have faced major issues due to uncertainties regarding infrastructure upgrades to support new settlements.
- 5.4.103 There is a need to avoid the mistakes of the past in respect of strategic allocations with viability challenges that impact delivery and/or the ability to deliver affordable housing (and/or ability to deliver in line with the original vision including in infrastructure terms). This suggests the potential to now rule out Lodge Farm as unreasonable. However, on the other hand, there is a case for continuing to test the option of a new settlement, as an alternative to urban extensions and/or with a view to delivering higher growth.
- 5.4.104 As part of this, the benefits of what will be achieved by South West Rugby are recognised, for example a new secondary school and a comprehensive spine road network. Also, it is acknowledged that the County is supportive of options for concentrating growth, with the Draft Plan consultation response for example stating:
- *“We believe that the dispersal method is contrary to The Borough Council’s objective... to “deliver infrastructure led growth”. It is of significant risk that either the current infrastructure is not sufficient to meet new dispersed development, nor can sufficient mitigation funding be raised [to] fully fund new infrastructure.”*
 - *“The dispersal strategy is not supportive of active travel and will require an increase in trips from villages to larger urban centres.”*
 - *“Primary age pupils may be able to walk to a local primary school but the dispersal strategy would see a significant increase in the number of secondary age school pupils who need to be transported to secondary provision. This will result in a significant increase to the County Council for home to school transport costs.”*
 - *“Post 16 Education/training/employment- transportation from rural locations is limited (Home to school transport not available for post 16).”*
 - *Feedback from Commissioners across Children’s and Adult Social Care Services, Social Work teams, and colleagues in the Integrated Care Board, is that the proposed dispersal strategy may add further burdens in areas with already existing challenges. The proposals for example in Wolvey... could lead a requirement to develop 175 social rent homes in that area... some of the 175 residents will be accessing social care services or early help prevention. However, there is limited care infrastructure within that area and due to the rural nature of the location...”*
 - *“... The County Council’s preference is for larger standalone developments – these would deliver primary and secondary education solutions in one place, i.e. Lodge Farm or Cosford. Cosford is close to the existing settlement of Rugby so initial services could be provided reasonably closely until such time as development supports the provision of new infrastructure. Lodge Farm might provide new infrastructure that would benefit not only the development but also Dunchurch and the smaller surrounding villages.*
- 5.4.105 On balance it is still considered reasonable to progress Lodge Farm to the RA growth scenarios, as per the approach at the Draft Plan stage, but the case for doing so has undoubtedly reduced considerably, which is a matter discussed further in Section 5.5.
- 5.4.106 Finally, it is noted that there are two very large sites to the north of Lodge Farm (i.e. south of Rugby in the vicinity of Dunchurch) that have been made available, but which are not being actively promoted to anything like the same extent as Lodge Farm, namely **Site 22** and **Site 91**. The Interim SA Report explained:

“[Site 91] has already been briefly discussed above, and is considered to perform poorly, including noting that this is the sensitive Rains Brook Valley, given nearby SW Rugby SUE and also noting higher quality agricultural land. With regards to Site 22, which is near adjacent to Lodge Farm, there is little reason to suggest that it is a preferable location to Lodge Farm at the current time (and, again, there is a need to give some weight to the fact that Lodge Farm has been a focus of promotion and work over recent years); however, it does perhaps warrant ongoing consideration as a comparator to Lodge Farm, plus its availability serves to highlight potential concerns regarding containment of growth / a risk of sprawl over time. Site 22 does have the benefit of linking to Dunchurch, the Rains Brook Valley could perhaps assist with landscape containment and nearby Draycote Water is a ‘plus’; however, Lodge Farm would have the benefit of [linking] to both Daventry and Rugby.”

- 5.4.107 A consultation response was received from the promoters of Site 22 suggesting that the site performs better than Lodge Farm as a new settlement option, but there was limited supporting evidence. Whilst Site 22 is closer to the Dunchurch and Rugby relative to Lodge Farm, it is equally closer to the South West Rugby committed growth area. Also, a key consideration is that evidence shows Site 22 and Site 91 to be the most constrained growth options in the Borough in landscape terms (Figure 5.5, above).
- 5.4.108 There is little or no strategic case to be made for proactively exploring new settlement options over-and-above what has been promoted to the Council.²³

Conclusion on settlement scenarios

- 5.4.109 This section has considered housing growth scenarios for each of the Borough’s key settlements. To reiterate, this section has not considered growth scenarios in respect of employment land or providing for Gypsy and Traveller accommodation needs, because a conclusion on growth scenarios for these matters is reached in Section 5.2.
- 5.4.110 Table 5.1 summarises the conclusions reached above.
- 5.4.111 It is important to be clear that a number of the conclusions on settlement scenarios are reached ‘on balance’. For example, whilst at Stretton-on-Dunsmore there does remain an important choice, but the choice is of limited strategic importance such that it does not warrant being explored further via appraisal of growth scenarios “on balance”.
- 5.4.112 Equally, it is important to be clear that a conclusion of “only one reasonable growth scenario” should not be taken to mean that the proposed submission approach is a fait accompli (i.e. there does remain the potential to question the proposed submission approach for all settlements through representations at the current time and through the subsequent Examination in Public).
- 5.4.113 The aim of the exercise above, the outcomes of which are summarised in Table 5.1, is to arrive at a discrete (manageable) number of key strategic settlement-specific choices that can then feed into work to define borough-wide RA growth scenarios in Section 5.5.

²³ Attention focuses on land linked to a train station and, in this regard, attention might focus on land to the south of the anticipated Rugby Parkway Station at Houlton. However, land here is primarily within West Northamptonshire and, in any case, there are constraints in the form of two railway lines and quite extensive flood zones, plus the village of Kilby to the south is notably sensitive in historic environment terms. The only other feasible locations of note are in the far north of the Borough, namely: A) a cluster of sites to the south / southwest of Hinckley (including **Site 321**); and B) a cluster of sites to the south / southeast of Hinckley adjacent or near to M69 J1 (including **Site 94**). However, there is little in the way of active promotion (of a new settlement), there are constraints to growth in this area (as discussed), there is a need to consider employment land as an alternative potential land use and there is limited or no clear strategic case for a new settlement in this area, including noting that any new settlement would link to Hinckley / Leicester, and there is currently no strategic steer regarding the need for growth in this area (as discussed).

Table 5.1: Summary of settlement-specific housing growth scenarios

Settlement	Growth scenarios
Rugby	Four growth scenarios namely: 1) the proposed submission approach (18 allocations for 1,258 homes); 2) Scenario 1 plus the two Hillmorton sites (1,533 homes in total); 3) Scenario 1 plus the North West Rugby (2,458 homes in total); and 4) Scenario 1 plus the two Hillmorton sites and NW Rugby (2,733 homes in total).
Binley Woods	One growth, namely allocation of one site for 43 homes.
Brinklow	One growth, namely allocation of two sites for a total of 325 homes.
Clifton-upon-Dunsmore	One growth, namely allocation of three sites for a total of 150 homes.
Dunchurch	Two growth scenarios namely: 1) the proposed submission approach (nil allocations); and 2) allocation of two sites for a total of 210 homes.
Long Lawford	Two growth scenarios namely: 1) one allocation for five homes; 2) the proposed submission approach (two sites for a total of 655 homes).
Ryton-on-Dunsmore	One growth, namely allocation of one site for 37 homes.
Stretton-on-Dunsmore	One growth, namely allocation of three sites for a total of 113 homes.
Wolston	One growth, namely allocation of two sites for a total of 95 homes.
Wolvey	One growth, namely allocation of two sites for a total of 210 homes.
Smaller villages	One growth, namely nil allocations.
New settlement	Two growth scenarios namely: 1) the proposed submission approach (nil allocations); and 2) allocation of Lodge Farm (1,200 homes in the plan period).

5.5 Reasonable growth scenarios

5.5.1 Beginning with growth scenarios in respect of employment land and providing for Gypsy and Traveller accommodation needs, to reiterate a conclusion on growth scenarios for these matters is reached in Section 5.2, namely:

- Employment land – four growth scenarios (set out above at paragraph 5.2.37 and also summarised below in Section 6.3)
- Gypsies and Travellers – only one growth scenario namely the proposed submission approach.

5.5.2 Focusing on growth scenarios for housing, the task here is to combine the settlement scenarios summarised in Table 5.1.

5.5.3 More specifically, whilst the scenarios in Table 5.1 are in respect of supply from new allocations, there is a need to combine these scenarios also accounting for:

- supply from commitments (7,993 homes);
- further supply on the basis of a windfall allowance (850 homes); and
- a need for any resulting borough-wide growth scenario to be ‘reasonable’ in light of the discussion of growth quanta and spatial strategy considerations presented in Section 5.2 and the plan objectives discussed in Section 2.

- 5.5.4 **Growth Scenario 1** is the proposed submission approach, which involves a total supply of 11,729 homes, such that there would be a supply buffer of 8.5% on top of the housing requirement, assuming that the requirement is set at LHN (10,812 homes).
- 5.5.5 There is no need to define lower growth scenarios (as discussed in Section 5.2), and so the next port of call is a scenario involving low growth at Long Lawford compensated for by support for higher growth to the south of Rugby (outside the Green Belt) and specifically support for Scenario 2 at Rugby and Scenario 2 at Dunchurch. Total supply is 11,564 homes, such that there would be a supply buffer of 7% on top of the housing requirement, assuming that the requirement is set at LHN. This is **Growth Scenario 2**.
- 5.5.6 The next port of call is then a similar scenario except that lower growth at Long Lawford is compensated for by support for allocation of North West Rugby, i.e. Scenario 3 at Rugby. Total supply is 12,279 homes, such that there would be a 13.5% supply buffer assuming that the requirement is set at LHN. This is **Growth Scenario 3**.
- 5.5.7 The next logical scenario then sees lower growth at Long Lawford compensated for by support for both higher growth to the south of Rugby (including Dunchurch) and a strategic allocation at North West Rugby. Total supply is 12,759 homes, such that there would be a 18% supply buffer assuming a requirement set at LHN. However, there is potentially no need for a supply buffer of this size such that the housing requirement might be set at a figure modestly above LHN. This is **Growth Scenario 4**.
- 5.5.8 The final scenarios then involve the proposed submission approach plus one or more omission sites, specifically:
- **Growth Scenario 5** – involves the proposed submission approach plus the additional sites to the south of Rugby (including Dunchurch). Assuming that the housing requirement is set at LHN then the supply buffer would be 13%. However, there is potentially no need for a supply buffer of this size such that the housing requirement could feasibly be set at a figure very modestly above LHN.
 - **Growth Scenario 6** – involves the proposed submission approach plus North West Rugby. Assuming that the housing requirement is set at LHN then the supply buffer would be 19.5%, which would amount to a high supply buffer although, on the other hand, delivery risks would serve as a reason for supporting a large supply buffer.
 - **Growth Scenario 7** – involves the proposed submission approach plus the additional sites to the south of Rugby (including Dunchurch) and North West Rugby. Assuming that the housing requirement is set at LHN then the supply buffer would be 24%, which would amount to a high supply buffer. As such, there would be potential for a higher housing requirement and/or an extended plan period.
 - **Growth Scenario 8** – involves the proposed submission approach plus the additional sites to the south of Rugby (including Dunchurch) and Lodge Farm. Assuming that the housing requirement is set at LHN then the supply buffer would be 24%, which would amount to a high supply buffer. As such, there would be potential for a higher housing requirement and/or an extended plan period. However, on the other hand, Lodge Farm has high delivery risk suggestive of the need for a large supply buffer.
- 5.5.9 Finally, it is important to be clear that the decision to include Lodge Farm in the RA growth scenarios at the current time is marginal, i.e. the assumption is that it would only be allocated, if necessary, after having exhausted other preferable supply options.²⁴

²⁴ The consultation response received from the Lodge Farm site promoters in 2025 questions the broad approach to reasonable alternatives, namely a focus on growth scenarios defined as alternative packages of site allocations where each is 'reasonable' in terms of providing for development needs alongside delivering on wider plan objectives. They state: "Such an approach would also contradict virtually every other local plan that has ever been adopted... If not remedied, the whole basis of the SA in relation to site appraisal for potential residential allocations is fundamentally flawed and RPS would be making the reference throughout the Examination stage, with reference to very well-trodden Case Law." However, it is important to be clear that a focus on reasonable alternatives in the form of growth scenarios has been applied successfully for many years in the context of local plan SA. The reasons for focusing on RAs in the form of growth scenarios is set out in Section 4 of this report.

5.5.10 In summary, the housing RA growth scenarios are as follows:

- **Scenario 1** – the preferred option (PO)
- **Scenario 2** – the PO **minus** Long Lawford **plus** south of Rugby
- **Scenario 3** – the PO **minus** Long Lawford **plus** NW Rugby
- **Scenario 4** – the PO **minus** Long Lawford **plus** south of Rugby and NW Rugby
- **Scenario 5** – the PO **plus** south of Rugby
- **Scenario 6** – the PO **plus** NW Rugby
- **Scenario 7** – the PO **plus** south of Rugby and NW Rugby
- **Scenario 8** – the PO **plus** south of Rugby and Lodge Farm

Table 5.2: The RA growth scenarios for housing (constants greyed-out)

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 7
Commitments	7,993	7,993	7,993	7,993	7,993	7,993	7,993	7,993
Windfall	850	850	850	850	850	850	850	850
Rugby area*	1,258	1,533	2,458	2,733	1,533	2,458	2,733	1,533
Binley Woods	43	43	43	43	43	43	43	43
Brinklow	325	325	325	325	325	325	325	325
Clifton-U-D	150	150	150	150	150	150	150	150
Dunchurch	-	210	-	210	210	-	210	210
Long Lawford	655	5	5	5	655	655	655	655
Ryton-O-D	37	37	37	37	37	37	37	37
Stretton-O-D	113	113	113	113	113	113	113	113
Wolston	95	95	95	95	95	95	95	95
Wolvey	210	210	210	210	210	210	210	210
Lodge Farm	-	-	-	-	-	-	-	1,200
Total homes	11,729	11,564	12,279	12,219	12,214	12,929	13,414	13,414
% above LHN	8%	7%	14%	13%	13%	20%	24%	24%

* Includes Houlton and Newton

6. Growth scenarios appraisal

6.1 Introduction

6.1.1 The aim here is to appraise the two sets of reasonable growth scenarios introduced above under the SA framework (Section 3). Specifically:

- Section 6.2 – presents an appraisal of the housing growth scenarios.
- Section 6.3 – presents an appraisal of the employment land growth scenarios.

Appraisal methodology

6.1.2 Under each sustainability topic the aim is to: 1) rank the scenarios in order of performance; and then 2) categorise the performance in terms of ‘significant effects’ using red / amber / light green / green.²⁵

6.1.3 There is a need to draw upon wide ranging sources of evidence and make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery, etc. Sources of evidence and assumptions are explained as appropriate, but there is also a need to balance explanation of evidence base and assumptions with a need for conciseness.

6.1.4 Another key assumption is in respect of the future baseline, i.e. the situation without an adopted plan with a robust land supply. Specifically, the assumption is that there would be a risk of sub-optimal growth under the presumption in favour of sustainable development. This is an important assumption, because a significant effect is, by definition, a significant effect *on the baseline*.

6.2 Housing growth scenarios appraisal

Introduction

6.2.1 The aim here is to appraise the five RA growth scenarios introduced in Section 5.5:

- **Scenario 1** – the preferred option (PO)
- **Scenario 2** – the PO **minus** Long Lawford **plus** south of Rugby
- **Scenario 3** – the PO **minus** Long Lawford **plus** NW Rugby
- **Scenario 4** – the PO **minus** Long Lawford **plus** south of Rugby and NW Rugby
- **Scenario 5** – the PO **plus** south of Rugby
- **Scenario 6** – the PO **plus** NW Rugby
- **Scenario 7** – the PO **plus** south of Rugby and NW Rugby
- **Scenario 8** – the PO **plus** south of Rugby and Lodge Farm

6.2.2 The appraisal is presented below under the SA framework, before a final section presents conclusions.

²⁵ **Red** indicates a significant negative effect; **amber** indicates a moderate or uncertain negative effect; **light green** indicates a moderate or uncertain positive effect; **green** indicates a significant positive effect; and **no colour** indicates a neutral effect.

Accessibility (to community infrastructure)

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
1	3	4	3	2	5	5	6

6.2.3 A key issue here is directing growth to locations with good accessibility to community infrastructure (with capacity) and/or directing growth to sites able to deliver new or upgraded community infrastructure in order to meet the needs of the community and also potentially in order to address an existing capacity issue.

6.2.4 Taking the variable growth locations in turn:

- Long Lawford – there is existing primary school capacity to accommodate future growth, and the settlement is well connected to Rugby town centre and the nearest secondary school. There is understood to be good potential for growth to secure transport upgrades and also deliver some modest onsite community infrastructure.
- South of Rugby – the four sites in question are modest in scale and so would deliver limited benefits in terms of community infrastructure. However, the Hillmorton sites have good access to existing community infrastructure within Rugby; and Dunchurch has comfortably the highest settlement score across the Main Rural Settlements, such that there is a need to question low growth.
- North West Rugby – the site could deliver a secondary school but there is no clear strategic need for a new secondary school in Rugby (N.B. understanding has evolved since the Draft Plan stage, as discussed in Section 5) and this would potentially not be an ideal location for a new school, given access challenges.
- Lodge Farm – there is no strategic case for a new secondary school here and there is a need to recognise that a school could deliver late, given viability challenges, such that there is pressure on schools in Rugby in the interim period. Other than the matter of secondary school capacity, it is recognised that the proposal is to deliver a range of onsite community infrastructure; however, and as discussed, viability challenges could result in a need to accept compromises.

6.2.5 In **conclusion**, the proposed submission approach (Scenario 1) performs well, and there are few concerns with additional allocation of sites to the south of Rugby (but there would be a need to confirm that this would not lead to school capacity issues).²⁶ There is not support for those scenarios that see deletion the allocations at Long Lawford (Scenarios 2, 3 and 4), there are concerns with a high growth strategy for Rugby (including given potential viability and delivery challenges at NW Rugby) and there is a clear concern with allocation of Lodge Farm, for the reasons set out.

Air quality

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
1	2	3	4	3	5	6	7

6.2.6 An Air Quality Management Area (AQMA) covers Rugby, Long Lawford, Clifton Upon Dunsmore and Dunchurch, which is quite unusual, and serves as an indication of the problematic traffic congestion that is experienced locally. In turn, there is a need to ensure a strong focus on minimising the need to travel, supporting modal shift away from the private car and avoiding problematic traffic congestion.

²⁶ The County Council's consultation response at the Draft Plan stage stated the following in respect of growth at Dunchurch: "Would not be able to accommodate total allocation at Dunchurch infant and Junior... Home to School Transport implications to other schools in Bilton Area. Could be a link with SW Rugby development and the schools but SW Rugby schools meeting their own demand." With regards to growth at Hillmorton, the consultation response stated: "Limited capacity at Secondary. Will require expansion of 3 existing schools or the provision of a new secondary school. Only capacity to expand at primary in the area might be English Martyrs Catholic Primary School. Possible that the proposed new primary school at Ashlawn Road could help support this growth but this has been designed to support Ashlawn Road and the wider South West Rugby..."

- 6.2.7 Given the AQMA issue it is appropriate to flag a concern with the two higher growth scenarios. In particular, there is a concern with Scenario 8, given limited potential to walk/cycle from Lodge Farm to key destinations and because of a concern regarding traffic through Dunchurch (discussed below), albeit there would be good potential to achieve a high quality bus service.
- 6.2.8 In **conclusion**, whilst it is appropriate to flag a concern with the higher growth scenarios given the AQMA issue, on balance only a 'moderate or uncertain' negative effect is predicted, recognising that air quality is generally improving over time and also noting that poor air quality is also an issue affecting both Coventry (where there is an area-wide AQMA) and Leicester (where there is a city centre AQMA). With regard to growth at Rugby, there is support for growth at Long Lawford over growth at either NW Rugby or across four sites to the south (Hillmorton and Dunchurch).

Biodiversity

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
2	2	1	1	1	1	1	1

- 6.2.9 All of the variable growth locations are subject to limited biodiversity constraint, and this is also broadly the case for the sites that are allocated as a constant across all of the growth scenarios, recognising that detailed work to examine biodiversity issues and opportunities has fed in strongly to the site selection process (see Section 5.2).
- 6.2.10 Of the variable growth locations the primary constraint is potentially to the south of Long Lawford noting a stream corridor adjacent to the west that is a Local Wildlife Site (LWS). However, the LWS is not associated with any priority habitat and there is good potential to avoid impacts (and feasibly deliver some enhancement).
- 6.2.11 In **conclusion**, the proposed approach (Scenario 1) performs well, in light of work completed since the Draft Plan stage, and then it is appropriate to conclude that there is merit in higher growth scenarios, recognising that the effect of higher growth could feasibly be to relieve growth pressure elsewhere in the sub-region. For example, the broad landscape associated with the River Avon valley adjacent to Coventry is subject to relatively high constraint, and there is ancient woodland constraint east of Hinckley.

Climate change adaptation

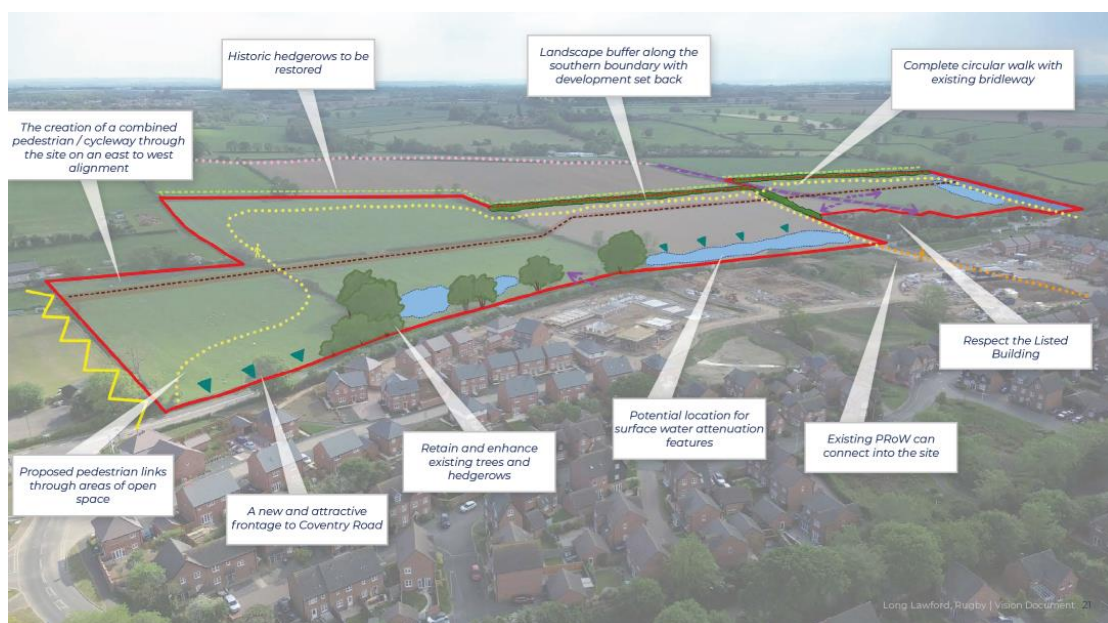
Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
=	=	=	=	=	=	=	

- 6.2.12 A key consideration here is flood risk, recognising that whilst this is an issue currently it is an issue that is set to get worse as a result of climate change.
- 6.2.13 None of the variable smaller sites are significantly constrained, i.e. intersect a flood risk zone to the extent that this will be a major constraint to masterplanning, such that there could be a need to accept compromises (feasibly even in respect of flood risk) or delivery could become challenging. However, there is a significant surface water flood channel along the A428 at the northern extent of Site 316 at Long Lawford. This has factored into concept / masterplanning work completed to date by the site promoter (Figure 6.1), but there will be a need for ongoing consideration. As part of this, there will also be a need to downstream properties at risk from flooding at Long Lawford.
- 6.2.14 Finally, with regards to the two variable strategic growth options:
- **NW Rugby** – much of the site is unconstrained in flood risk terms but there is a need to bridge the floodplain of the River Swift. There is also a need to consider that the Rugby urban area downhill / downstream is constrained by extensive flood risk zones associated with the River Avon. In turn, there could feasibly be the potential to explore opportunities around strategic flood water attenuation.

- **Lodge Farm** – only intersects a fluvial flood risk zone at its northwestern extent but intersects a series of significant surface water flood risk zones. As a large strategic site there would be good potential to masterplan with flood risk in mind, clearly to include avoiding any sensitive development in a flood zone, and it could also be that flood risk zones provide structural framework around which to masterplan with a view to delivering a legible and high-quality new community. However, viability challenges that have a bearing on masterplanning.

6.2.15 In **conclusion**, whilst there is a case for flagging a concern with Lodge Farm, it is noted that the Environment Agency did not raise any concerns through the Draft Plan consultation (when Lodge Farm was an omission site but featured in the RA growth scenarios), hence the scenarios are now judged to perform on a par. With regards to significant effects, there is a need to also factor-in sites that are a constant across the growth scenarios, but overall, there are limited concerns (as discussed below, in Section 9) such that neutral effects are predicted across the scenarios.

Figure 6.1: Site concept submitted by the promoter of Site 316



Climate change mitigation

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
=	=	=	=	=	=	=	=

- 6.2.16 The focus of discussion here is on minimising per capita greenhouse gas (GHG) emissions from the built environment, recognising that transport emissions (arguably a more significant consideration) can be a focus of discussion below under 'Transport'.
- 6.2.17 It is inherently difficult to differentiate between site options and growth scenarios (i.e. combinations of site options) in terms of potential to minimise built environment emissions, which primarily means achieving standards of 'operational' built environment emissions over-and-above those required under the Building Regulations, although a further consideration is 'embodied' emissions, e.g. from the construction process.
- 6.2.18 As a general rule it can often be said that strategic site options give rise to an opportunity to achieve high standards – and potentially even to achievement of net zero development – over-and-above smaller sites, given: A) the potential to realise certain opportunities through masterplanning; B) economies of scale that can be supportive of development viability (such that there is potentially viability 'headroom' to allow funding to be directed to decarbonisation measures); and C) generally because strategic schemes are naturally a focus of scrutiny and might even be delivered as an exemplar.

- 6.2.19 However, in practice, the recent experience in the Borough has been that strategic sites have faced development viability challenges that have greatly constrained their ability to deliver affordable housing and so presumably (it has not been possible to review matters in detail) have also constrained their ability to deliver standards of built environment decarbonisation that go beyond minimum requirements.
- 6.2.20 In turn, a key consideration is directing growth to locations with strong development viability on the basis of there being a strong housing market and/or because the sites involved are not associated with abnormal development costs. Another consideration is ensuring a good geographical spread of sites, and, in this regard, it can be noted that a benefit of directing growth to Long Lawford is the relative distance to existing committed major growth locations at Houlton and SW Rugby. A final consideration is that development viability has been found to be particularly challenging at Lodge Farm.
- 6.2.21 In **conclusion**, there is a case for supporting the proposed submission approach; however, matters are highly uncertain and so, on balance, the scenarios are judged to perform broadly on a par.
- 6.2.22 With regards to significant effects, there is a need to factor in: A) sites that are a constant across the growth scenarios; and B) any local targets in respect of achieving 'net zero'. With regards to (A), most of the constant sites are relatively small, but there has generally been a focus on allocating sites with strong development viability and delivery credentials, e.g. there are few proposed allocations with existing uses on site that could impact viability / delivery. With regards to (B), whilst the Council as an organisation has committed to achieving net zero by 2030, there is no commitment to achieve net zero borough-wide ahead of 2050, which is the national net zero target date (in contrast to a number of neighbouring authorities, e.g. Hinckley and Bosworth Borough has committed to achieving net zero area-wide by 2030).
- 6.2.23 On balance it is considered appropriate to flag a 'moderate or uncertain' negative effect across the scenarios on the basis that climate change mitigation / decarbonisation is a national priority to the extent that it must feed in strongly to all key decision-making as part of preparing a Local Plan, which primarily means decision around spatial strategy / site selection (as opposed to placing a reliance on DM policies that risk not being fully implemented on viability grounds).

Communities, health and wellbeing

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
2	2	1	2	2	2	2	2

- 6.2.24 This is a broad topic heading under which there is the potential to consider wide-ranging issues / opportunities over-and-above those discussed under the 'accessibility' and 'homes' topic headings.
- 6.2.25 A headline consideration is community concerns with growth at the variable sites located to the south of Rugby (Hillmorton and Dunchurch), with concerns at Hillmorton primarily relating to landscape sensitivities and concerns at Dunchurch primarily relating to the proximity of South West Rugby.
- 6.2.26 Further considerations are then: A) at Dunchurch there is a need to consider a risk of piecemeal growth to the west, as discussed in Section 5.4; at Hillmorton one of the sites is located adjacent to the Oxford Canal and the Canal and River Trust suggest this could represent an opportunity; and C) at certain of these sites there are also access challenges and/or challenges with achieving good walking / cycling connectivity.
- 6.2.27 Also, at Long Lawford, whilst limited concerns were raised through the Draft Plan consultation, at which time there was one proposed allocation for 400 homes, there is a need to consider whether the new proposed higher growth strategy (650 homes in total across two sites) may generate concerns.

- 6.2.28 This could feasibly be the case because these growth locations are set to deliver relatively little in terms of community infrastructure (they will deliver new open space, new convenience retail and space for a community use, e.g. a pharmacy). Also, the effect of the new proposed allocation will be to reduce separation with Rugby. However, growth is set to deliver transport infrastructure, including a new walking and cycling route to Bilton. The context at Long Lawford is that there has been considerable recent growth, and another consideration is that a new community to the south of the village will be somewhat separated from the existing village on account of the intervening A428.
- 6.2.29 Finally, with regards to the two variable strategic growth options:
- **NW Rugby** – achieving good access is challenging and there is generally a concern regarding the potential for a new community to link effectively to Rugby given the intervening industrial area, the River Swift corridor and the Oxford Canal corridor. However, there are relatively few concerns regarding impacts to nearby communities; indeed, adjacent Newbold on Avon area experiences relative deprivation, such that there could be the potential to deliver benefits to the area.
 - **Lodge Farm** – has been discussed for a number of years and has generated significant opposition among rural residents and those of Dunchurch. There would be a significant landscape gap to the rural village of Willoughby to the south, and this would be retained in perpetuity given flood risk zones. The main concern is likely around impacts to Dunchurch, particularly in terms of traffic, as discussed further below. Otherwise, and has been discussed, there could be the potential to deliver a high-quality new settlement, albeit the site straddles the A45 leading to severance (the Council has argued for the need for a bypass) and there would be a range of major infrastructure and wider costs with implications for development viability and, in turn, likely a need to accept compromises including potentially around community infrastructure delivery and masterplanning / place-making.
- 6.2.30 In **conclusion**, under this heading it is considered appropriate to flag support for directing growth to NW Rugby in place of growth at Long Lawford, Hillmorton and Dunchurch. There is also not support for higher growth scenarios.
- 6.2.31 With regards to significant effects, and factoring-in allocations that are a constant across the growth scenarios, it is considered appropriate to conclude ‘moderate or uncertain’ positive effects across all the scenarios. It is clearly the case that the proposed submission approach been developed with local community interests as a foremost consideration (e.g. as reflected in changes made since the Draft Plan stage), and both NW Rugby and Lodge Farm overall likely represent an opportunity in terms of directing growth with a view to aligning with community, health and wellbeing objectives.

Economy and employment

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
=	=	=	=	=	=	=	=

- 6.2.32 There is limited potential to comment here, recognising that employment land growth scenarios are given stand-alone consideration below, i.e. given that the current housing growth scenarios are appraised with minimal employment land supply assumptions.
- 6.2.33 The main consideration is around directing housing growth to locations well-connected to centres of employment and employment growth areas; however, it is difficult to reach strong conclusions, beyond highlighting that NW Rugby is better located in terms of accessing employment than Lodge Farm in this regard. However, Lodge Farm would have the benefit of being well-linked to a major centre of employment at SW Rugby, could be considered better linked to Coventry, and would be well-linked to Daventry.
- 6.2.34 Finally, with regards to Lodge Farm a concern was raised through consultation is in respect of impacts to Dunchurch Pools (Marina), which is a key inland boating tourism facility for the Borough. There would appear to be good potential to mitigate impacts through masterplanning, but equally there are masterplanning uncertainties.

6.2.35 In **conclusion**, it is not possible to differentiate between the growth scenarios with confidence and neutral effects are predicted.

Figure 6.2: Concept masterplan submitted by the Lodge Farm site promoter (2025)



Historic environment

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	2	2	2	2

6.2.36 This is a key factor with a bearing on spatial strategy / site selection in the Rugby context. Taking the variable growth locations in turn:

- Long Lawford – the proposed growth location was historically a rural area; however, there is a historic farm at the northern extent of Site 316, including a Grade II listed farmhouse. The farm is well-screened from the A428 but is prominent within a rural landscape on the approach to Long Lawford from the south along Lawton Heath Lane, which is potentially a popular walking / cycling route from Rugby (noting bridleways). The Site Assessment Topic Paper explains:

“The site is located at the southern edge of Long Lawford, and envelopes Avon Lodge, a grade II listed 18th-century farmhouse. The asset is a good example of its type, and retains some associated historic working buildings. One is an L-plan 19th century working building located within the site that, while it appears to be heavily altered, may be of heritage interest, and a ‘curtilage listed’ structure. Further investigation would be required prior to, and to inform site redevelopment.

The site’s large agricultural fields contribute to the farmhouse’s setting, albeit to a somewhat diluted degree due to their 20th century amalgamation and character. The farmhouse’s visibility from its surroundings is limited by hedgerows and tree planting, but glimpses allude to its presence and architectural interest.

Potential impacts include the erosion of the farmhouse's rural setting through loss of the historic L-Plan range, the redevelopment of fields...

Mitigation can be achieved through: the considered layout of the redevelopment, to ensure the farmhouse remains singular and distinctive in its surroundings; creation of a pedestrian connection linking local public rights of way to improve public appreciation; providing a buffer to the farmstead; and potential retention and reuse of the historic L-plan working buildings should they be found to be of... interest."

- South of Rugby – with regards to the two sites at Rugby, this area was historically the village of Hillmorton, which was subsumed into Rugby in the 20th century. Both sites are separated from the former high street to the north, which has a strong historic character (but is not designated as a conservation area), but it is noted that historic mapping shows a characteristic field pattern at Site 334. Meanwhile, Site 40 is adjacent to a historic farm to the south, including a Grade II listed farmhouse, and is also adjacent to the Oxford Canal, which is an important heritage asset albeit not designated as a conservation area within Rugby Borough.

With regards to the two sites at Dunchurch, whilst the village centre conservation area is a key asset, this is separated from the sites by more modern development. However, it is noted that there is a Grade II listed building to the south of the B4429 which could feasibly be impacted by development at both sites.

- NW Rugby – the site includes the shrunken village of Cosford, which is a scheduled monument and a significant constraint, noting public rights of way and given a likely need to achieve access to the site via a route in close proximity. Also, to the south of the site is the Oxford Canal and beyond that the historic core of Newbold on Avon, although the Grade I listed church is well set back.
- Lodge Farm – this is a historically very rural area with low onsite sensitivity; however, there is a significant concern regarding traffic impacts through the Dunchurch Conservation Area, which is a key asset within the Borough (noting the dense concentration of listed buildings) already under pressure as a result of nearby growth. There is also significant historic environment constraint to the east of Dunchurch which likely rules out the possibility of an eastern bypass.

6.2.37 In **conclusion**, it is very difficult to differentiate the alternatives because all of the variable options are subject to a degree of constraint. It could be suggested that growth at Long Lawford is preferable to growth at Dunchurch from a historic environment perspective, recognising that Dunchurch is a key area of historic environment / heritage sensitivity within the Borough, but this conclusion cannot be reached with any certainty, given the grade II listed farmhouse sensitivity at Long Lawford. As such, and on balance, it is considered appropriate to simply flag a concern with those scenarios that would involve the proposed submission approach plus additional allocations.

6.2.38 With regards to significant effects, there has been detailed work to consider how to avoid and mitigate historic environment impacts (see discussion in Section 5.2), but there would be a need for further work in this regard under Scenarios 5 to 8.

Homes

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
3	4	4	2	2	2	1	2

6.2.39 Even the lowest growth scenarios perform well in that: A) there would be the potential to set the housing requirement at LHN; B) there would not be a need for a stepped housing requirement (i.e. the requirement would be set at LHN from the outset); C) there would be a good mix of sites with a view to minimising delivery risk; D) there would be a healthy supply buffer with a view to ensuring that the housing requirement is delivered year-on-year in practice; and E) there would be a strong focus on directing growth to sites / locations with strong development viability (albeit the new proposed approach of directing additional growth to urban sites can be questioned in this regard).

- 6.2.40 By way of context, it is important to be clear that distribution growth with a view to avoiding viability and delivery challenges is a very well established objective, for example with the Inspector's Report for the adopted Local Plan explaining:

"... since 2011 monitoring shows that a distribution focused so heavily on Rugby town has been unable to deliver housing at the rate necessary to achieve [the committed requirement]. That is notwithstanding the steps taken by the Council to accelerate the delivery of the existing SUEs. As a result the Council has not been able to maintain a deliverable 5 year housing land supply in recent years..."

... The Housing Delivery Study (2015) (HDS), commissioned by the Council to consider market capacity for housing delivery in and around Rugby, also concludes that continued reliance on a limited number of large SUEs on the edge of Rugby is unlikely to deliver housing at the rate necessary to support the increased housing target in the submitted Plan at 660 dpa. To this end, in order to increase delivery rates, the HDS recommends a broader mix of locations for new housing including a major growth location away from Rugby and developments in the smaller settlements of the borough."

- 6.2.41 It is difficult to suggest a case for directing growth to four sites to the south of Rugby rather than to a strategic growth location at Long Lawford, including because sites south of Rugby are in proximity to SW Rugby and Houlton. Also, from a 'housing' perspective, there is certainly not a case for directing growth to NW Rugby ahead of Long Lawford.
- 6.2.42 With regards to the higher growth scenarios, there cannot be said to be a case for supporting Lodge Farm on the assumption that it would not be able to deliver any affordable housing. However, there is a case for the other higher growth scenarios, which would deliver additional affordable housing to more fully provide for needs. In addition to affordable housing delivery, a further motivation for boosting the housing requirement is potentially allowing for some flexibility to provide for unmet needs and/or the plan period could be lengthened (e.g. South Warwickshire is planning to 2050).
- 6.2.43 In **conclusion**, the order of preference reflects total growth quantum but also the distribution / mix of sites. All of the scenarios perform well in housing terms, but the two scenarios that would replace growth at Long Lawford with growth either to the south of Rugby or at NW Rugby perform less well.

Landscape and townscape

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
<u>1</u>	2	<u>1</u>	2	2	2	2	2

- 6.2.44 Taking the variable growth locations in turn:

- Long Lawford – this is not one of the more sensitive landscapes and rising topography to the south would assist with securing a degree of containment, but the situation is nonetheless challenging in this regard, noting that the site boundary does not align with field boundaries. There are some quite extensive views, and footpaths through this area link the village to Rugby. The effect of growth could be to risk Long Lawford merging with Rugby, but it is not clear that this is a major issue in landscape terms, providing there is not ongoing sprawl. The effect would be to retain Rugby's strong focus on the River Avon corridor.
- South of Rugby – with regards to the two sites at Rugby, this is broadly a sensitive sector of land given the relationship between the edge of Rugby / Hillmorton and the Rains Brook valley / Oxford Canal to the south, beyond which is the raised ironstone landscape of Daventry Borough, including the historic ironstone edge villages of Barby and Kilsby. There is potential to define site boundaries aimed at securing containment and minimising landscape impacts, and there is some screening from important viewpoints, but a concern is ongoing piecemeal growth.

- NW Rugby – whilst topography (a high point in the western part of the site) could assist with achieving containment, there could nonetheless be a concern regarding achieving a defensible long term Green Belt boundary. The bulk of the site is subject to limited landscape sensitivity, given the adjacent industrial area (also noting associated power lines). However, several important public rights of way cross the site, and there is a need to consider impacts associated with achieving good access at the southern extent of the site (Oxford Canal) and the northern extent of the site (Swift Valley and Cosford).
- Lodge Farm – the Inspectors Report for the adopted Local Plan discussed landscape sensitivity in detail, and since that time the site boundary has been expanded. This is a distinctly rural area experienced via expansive views across a flat landscape from the A45. Public rights of way intersect the site which link the Oxford Canal to Willoughby and Grandborough. Detailed work has been completed which shows this to be more sensitive than NW Rugby. Also, a further concern is that the concept masterplan shows the proposed village centre at the eastern edge of the site, such that there could be pressure for further expand the site to the east, potentially leading to a risk of sprawl towards Willoughby. Submitted proposals show extensive green infrastructure around the edge of the site other than at the eastern edge adjacent to the village centre.

6.2.45 In **conclusion**, there is not support for growth at Hillmorton from a landscape perspective nor allocation of Lodge Farm. However, there is also broadly a case for taking a proactive approach to growth in Rugby recognising that landscape sensitivity at the sites in question is at most “medium”. Overall, a ‘moderate or uncertain’ negative effect is predicted for the worst performing scenarios.

Resources

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
=	=	=	=	=	=	=	=

- 6.2.46 A key issue to focus on here is loss of best and most versatile (BMV) agricultural land, which the NPPF classifies as land that is of grade 1, 2 or 3a quality.
- 6.2.47 The nationally available low resolution / accuracy dataset indicates that there is a concentration of grade 2 quality land to the south of Rugby, whilst other variable sites are shown to intersect grade 3 quality land (which may or may not be MBV).
- 6.2.48 None of the sites have been surveyed in detail, which is particularly surprising for Lodge Farm, given how long and actively the site has been promoted for. However, on the basis of the nationally available dataset it seems likely that the site does not comprise BMV quality land, as there is a nearby area of grade 4 quality land (albeit an area associated with flood risk). At NW Rugby it is noted that land adjacent to the east has been surveyed in detail and been found to comprise grade 3a quality land (i.e. BMV).
- 6.2.49 One other consideration is sterilisation of minerals resources accounting for Minerals Safeguarding Areas (MSAs) in the Warwickshire Minerals Plan, but it is inherently difficult to conclude significant concerns, as minerals safeguarding is not absolute. It is noted that extensive MSAs cover both NW Rugby and Long Lawford.²⁷

²⁷ The County Council stated the following regarding NW Rugby at the Draft Plan stage: “We would object to this site. The proposals cover three MSAs – Building Stone, Cement raw materials and Sand and Gravel and there are extensive resources. The northern part of the site was allocated for sand and gravel working in the 1995 Minerals Local Plan (PA3 Cosford) but not taken forward. We would object because it is a very large site, covers several minerals, has the potential for future working, could be linked to the A426 and J1 of the M6 and supply minerals to Rugby and Coventry and is near to the Northants and Leicestershire borders making it a strategic location. It could be a replacement for Shawell Quarry which lies on the A426/A5 junction and on the WCC/ LCC border. However, we could see a scenario where we could remove our objection and that would be if a programme of prior extraction took place (the project will take 10-15 years to be completed), the site include a strategic mineral store where minerals could be conserved for long term use and then used for both on site long term developments and also sale to the local market. It could have a small compound where on site processing with mobile plant could take place. We would need to see a detailed mineral assessment report based on site investigations.”

- 6.2.50 In **conclusion**, it is not possible to differentiate between the growth scenarios with any confidence. After having additionally accounted for constant site allocations, it is clear that the Local Plan will result in the loss of a quantum of BMV agricultural land that might be considered significant, but judging significance is inherently difficult (with a lack of guidance available on this topic). A final point to note is that the Borough is not obviously any more or less constrained than other neighbouring local authorities within the sub-region, such that this is not a factor in favour of lower or higher growth.

Transport

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
1	2	2	3	4	5	6	7

- 6.2.51 Transport is a key issue for any Local Plan, and the Rugby Local Plan is no exception. 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, and away from traffic congestion hotspots (including because traffic is a barrier to active and public transport. Taking the variable options in turn:

- Long Lawford – detailed work since the Draft Plan stage has shown there to be a clear transport case for supporting strategic growth at Long Lawford, particularly as there is the potential to achieve good connectivity into Rugby.
- South of Rugby – with regards to the two Rugby sites, both sites perform reasonably well in transport terms, although there are detailed matters for ongoing consideration regarding securing good walking / cycling connectivity. With regards to the two Dunchurch sites, traffic congestion in this area is an issue and one of the sites in question is understood to be associated with challenging access.
- NW Rugby – achieving good access and walking / cycling connectivity would clearly be challenging, and there is also a need to consider the potential to secure high quality bus connectivity. Work has been completed since the Draft Plan stage that shows that the site could potentially deliver in line with transport objectives, but there would be major costs involved and hence likely a need to compromise on wider objectives, notably affordable housing. From the Site Selection Topic Paper:

“The immediately surrounding road network has relatively low levels of congestion, but impact on the A426 is a significant issue...”

Access to the site is a concern, although parts score well for connectivity. Achieving access from Overview Way would require bridging the River Swift floodplain and skirting around the Cosford Scheduled Monument. Access from the south is potentially equally challenging requiring bridging the Newbold Tunnel and increasing traffic onto Main Street in Newbold on Avon. Although shown as a point of access on the indicative plans, Brownsover Road is unlikely to be suitable to be a principal vehicular point of access in view of the narrow and weak canal bridge. [work in the strategic transport assessment assumes a need to replace that canal bridge in order to bring forward this point of access]

The access challenges and need for significant new highways infrastructure raise viability concerns.”

- Lodge Farm – this is clearly a rural location, with limited potential to reach key destinations by walking / cycling (beyond what can be delivered within the site). However, there is thought likely to be good potential to secure a new or enhanced bus service between Rugby and Daventry, which would benefit communities over-and-above the new community at Lodge Farm. A key issue though is the A426 / B4429 junction in the centre of Dunchurch, and it is difficult to envisage a solution, including likely no potential to deliver an eastern bypass to the village (given heritage constraints). As discussed, detailed work has been completed since the Draft Plan stage that serves to indicate that the necessary transport upgrades may well not be achievable without making the scheme unviable.

It is also important to recognise the context of nearby SW Rugby, where delivery has proved challenging including on account of transport infrastructure challenges. In turn, a better time to consider Lodge Farm could be in the future once new infrastructure to the south west of Rugby has delivered.

Finally, it is recognised that the site promoters submitted detailed information at the Draft Plan consultation stage, for example stating: *“This is a site which from a transport/mobility / policy perspective ticks all of the boxes, can create a step change in the approach to place/design and can bring widespread benefits to existing communities in terms of ‘Gold Star’ investment in public transport...”* However, the Council is of the view that there will be major viability challenges after having factored in the cost of major upgrades, including grade separation at the Thurlaston interchange (A45/M45 junction) and an A45 bypass of the new village.

- 6.2.52 In **conclusion**, the proposed submission approach is strongly supported in transport terms, including in light of the Strategic Transport Assessment (2025). There is not support for scenarios that replace Long Lawford, and there are clear concerns with higher growth scenarios (including noting proximity of NW Rugby and Long Lawford).

Water

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
=	=	=	=	=	=	=	=

- 6.2.53 Focusing on capacity at wastewater treatment works (WwTWs), which is a key issue, the Environment Agency comments as follows through the Draft Plan consultation:

“... we have previously commented on the Level 1 Water Cycle Study (WCS) 2024)) and understand it considers headroom capacity at the existing wastewater treatment works (WwTW) in Warwickshire in consideration of allocations in adopted local plans, residential and employment commitments, recent completions and windfall allowance. This does not appear to include the new allocations being considered in the Local Plan.

Bearing in mind the new allocations do not appear to be included in the headroom capacity assessment in the Level 1 WCS and whilst we note the policy requirements in CL3, we recommend... further assessment at this stage to determine whether there is sufficient capacity or planned capacity in the receiving STW(s) to serve Rugby’s growth (in combination with growth proposed in neighbouring councils where applicable), without causing significant deterioration of receiving water bodies.

Where there is an identified constraint... you should demonstrate that there is a solution... This will require consultation with Severn Trent. The outcome of this may inform a ‘phasing’ policy... The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable.”

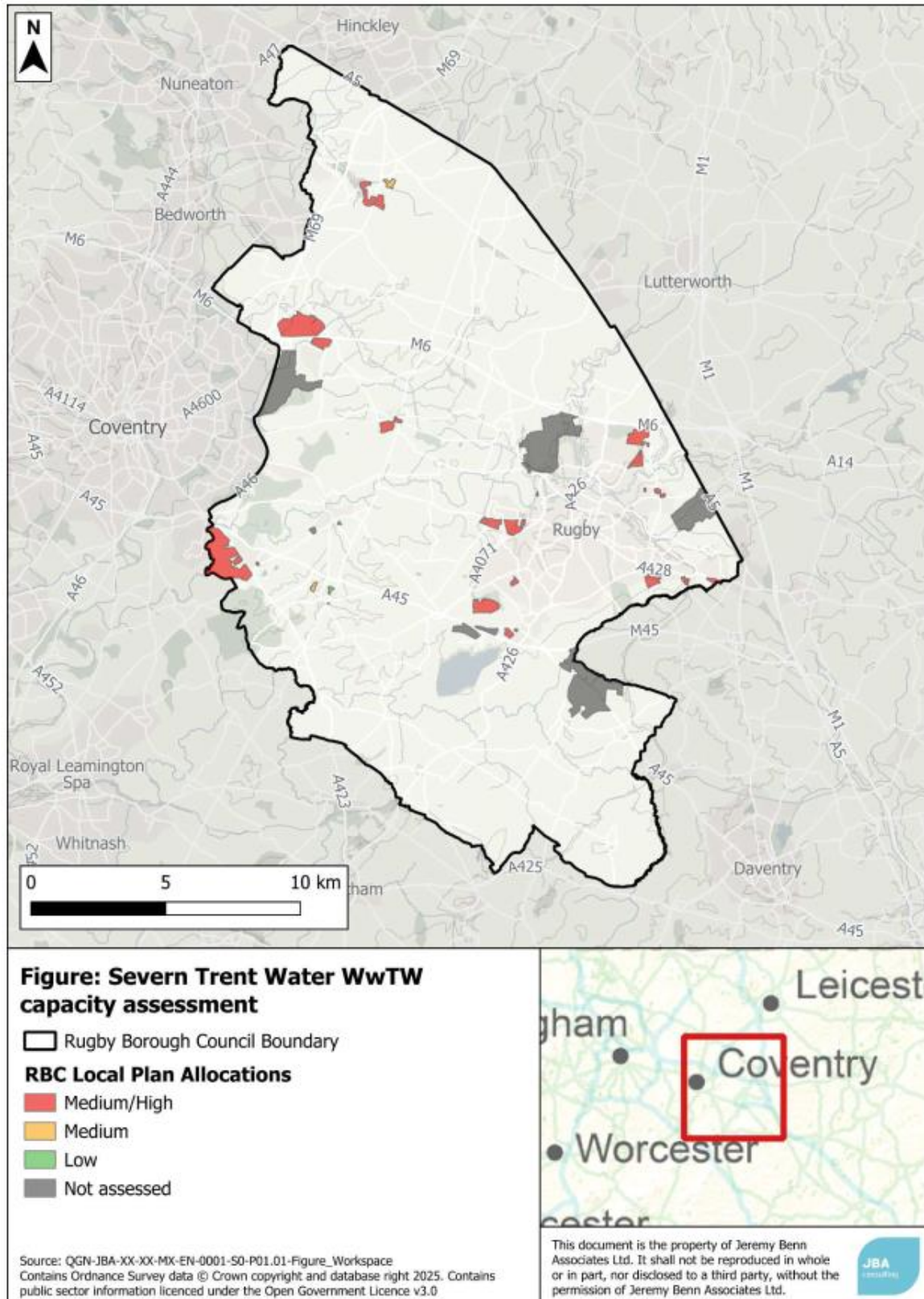
- 6.2.54 A Stage 2 WCS was then completed, which concludes in respect of WwTWs:

“A capacity assessment was undertaken... comparing the future flow from each WwTW (the current actual flow and the forecast additional flow from growth), with the permit limit. This assessment was carried out for the full range of potential growth scenarios within Rugby. Six of the WwTWs serving growth in Rugby are expected to be close to or exceeding their permit during the Local Plan period. An increase in the permit limit, and / or upgrades to treatment capacity may [therefore] be required at these WwTWs...

Severn Trent Water provide wastewater services for Rugby. Developments in areas where there is limited wastewater network capacity will increase pressure on the network, increasing the risk of a detrimental impact on existing customers, and increasing the likelihood of storm overflow operation... Early engagement between developers, RBC and the water companies is recommended to allow time for the strategic infrastructure required to serve these developments to be planned.”

- 6.2.55 Figure 6.3 is taken from the Stage 2 WCS and shows the assessment of WwTW capacity as submitted by Severn Trent Water through the Draft Plan consultation. It can be seen that neither Lodge Farm nor NW Rugby was assessed.
- 6.2.56 In **conclusion**, from the Stage 2 WCS it is clear that securing wastewater treatment work capacity in support of growth is challenging locally, as it is in many areas, but there is no clear evidence to suggest any location or site specific issues or opportunities.

Figure 6.3: Severn Trend Water WwTW capacity assessment



Appraisal summary

- 6.2.57 The table (or 'matrix') below presents a summary of the appraisal presented above. Within each row, the aim is to **1**) rank the scenarios in order of performance (with a star indicating best performing); and then **2**) categorise performance in terms of significant effects using **red** (significant negative) / **amber** (moderate/uncertain negative) / **light green** (moderate/uncertain positive) / **green** (significant positive) / **no colour** (neutral).
- 6.2.58 **Scenario 1** is clearly shown to perform well. However, it is not necessarily the case that this is the best performing scenario overall, because the appraisal is not undertaken with any assumptions made regarding the degree of importance / weight that should be assigned to each of the topics (such that the intention is not that the matrix should be used to calculate a total score for each of the scenarios).
- 6.2.59 It is important to note that **Scenario 1** is not the best performing scenario under three of the topic headings (biodiversity, communities and homes), and the Council might choose to give particular weight to one or more of these topics when reaching a conclusion on which of the growth scenarios performs best overall.
- 6.2.60 The next key point to note is that **Scenario 7** is arguably shown to perform poorly overall although, once again, it is important to be clear that the aim of the appraisal is not to reach conclusions on the overall 'sustainability' of each of the scenarios. Also, it can be noted that numerous of the topic-specific appraisal conclusions are associated with a significant element of uncertainty, in that they are underpinned by assumptions.
- 6.2.61 It can also be noted that **Scenario 6** is arguably shown to perform relatively poorly, particularly accounting for the number of predicted negative effects (only Scenario 7 performs worse in this regard). However, it is shown to perform notably well under the 'homes' heading, and the Council might choose to give particular weight to this issue.
- 6.2.62 Finally, headline points to take from the appraisal include:
- Accessibility – there is supporting for directing growth to Long Lawford and there are concerns with higher growth at Rugby including given schools capacity. There are concerns with Lodge Farm given viability challenges.
 - Air quality – there are concerns with higher growth as this is a constraint locally.
 - Biodiversity – there are relatively few concerns given the sites in question.
 - Climate change mitigation – viability could impact delivery of net zero development.
 - Communities – there is tentative support for a focus of growth at NW Rugby.
 - Historic environment – widespread constraints lend support for lower growth.
 - Homes – there is a case for higher growth involving sites with stronger viability.
 - Landscape – there is not support for allocations at Hillmorton (south of Rugby).
 - Resources – loss of significant BMV agricultural land is likely under any scenario.
 - Transport – this is a key issue locally and there are concerns with higher growth. Growth at Long Lawford performs well and there is a need to support sites with stronger viability that can deliver or fund the necessary infrastructure upgrades.
 - Water – there are residual uncertainties around wastewater treatment capacity.

Table 6.1: Housing growth scenarios appraisal summary

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
Accessibility	★1	3	4	3	2	5	5	6
Air quality	★1	2	3	4	3	5	6	7
Biodiversity	2	2	★1	★1	★1	★1	★1	★1
Climate change adaptation	=	=	=	=	=	=	=	=
Climate change mitigation	=	=	=	=	=	=	=	=
Communities, health & wellbeing	2	2	★1	2	2	2	2	2
Economy & employment	=	=	=	=	=	=	=	=
Historic environment	★1	★1	★1	★1	2	2	2	2
Homes	3	4	4	2	2	2	★1	2
Landscape & townscape	★1	2	★1	2	2	2	2	2
Resources	=	=	=	=	=	=	=	=
Transport	★1	2	2	3	4	5	6	7
Water	=	=	=	=	=	=	=	=

6.3 Employment land growth scenarios appraisal

Introduction

6.3.1 The aim here is to appraise the four RA growth scenarios introduced in Section 5:

- Scenario 1 – the proposed submission approach (Figure 5.3 presented above)
- Scenario 2 – Scenario 1 but with Walsgrave Hill replaced by Prologis/Mountpark
- Scenario 3 – Scenario 1 but with Walsgrave Hill replaced by North of Houlton
- Scenario 4 – Scenario 1 but with Walsgrave Hill replaced by 2 sites at Thurlaston.

Appraisal

6.3.2 A lighter touch approach to appraisal is taken relative to the approach taken above. Specifically, Table 6.2 presents a summary appraisal matrix, followed by a discussion.

Table 6.2: Employment land growth scenarios appraisal

Topic	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Accessibility	★1	★1	2	3
Air quality	=	=	=	=
Biodiversity	2	2	★1	★1
Climate change adaptation	=	=	=	=
Climate change mitigation	=	=	=	=
Communities, health & wellbeing	=	=	=	=
Economy & employment	2	★1	3	4
Historic environment	3	★1	2	2
Homes	=	=	=	=
Landscape & townscape	2	★1	★1	★1
Resources	=	=	=	=
Transport	★1	4	3	2
Water	=	=	=	=

6.3.3 As an initial point to note, there are several topic headings that are of limited relevance to this current appraisal and need not be discussed in detail. Focusing on key topics:

- **Accessibility** – three of the variable sites are associated with an opportunity to deliver significant new accessible greenspace, but the opportunity is most significant at Walsgrave Hill (a new country park linking to Coombe Abbey Country Park) and Prologis/Mountpark (a country park along the River Avon corridor).

- **Air quality** – both Coventry and Rugby are significantly constrained in terms of air quality, but it is difficult to differentiate between the scenarios with any certainty.
- **Biodiversity** – Walsgrave Hill is sensitive on account of proximity to Coombe Pool SSSI; however, there is good potential to avoid impacts through delivery of the aforementioned new country park. At both Prologis/Mountpark and North of Houlton there is an opportunity to deliver enhancements to a river / stream corridor. The opportunity is more significant at the Prologis/Mountpark, but equally the river corridor here is associated with more extensive biodiversity sensitivity.
- **Climate change adaptation** – three of the sites are quite strongly associated with river corridors; however, there should be good potential to avoid development in the flood risk zone. Having said this, it is not uncommon to accept some flood risk in the context of employment land such that, in turn, there is a need to consider the risk of employment land in a flood zone worsening downstream flood risk.
- **Communities, health and wellbeing** – elaborating on the matter of delivering new accessible greenspace (country parks), the opportunity is likely greater on the edge of Coventry in terms of benefiting existing communities. With regards to North of Houlton, whilst the country park opportunity is considered to be less significant, it is acknowledged that new employment land here could potentially complement the new community at Houlton to the south, plus the employment land would be accessible from Rugby. At Rugby there is an existing issue of Houses in Multiple Occupation (HMOs), but it is difficult to suggest that this serves as a reason for limiting further growth in strategic logistics / warehousing. Finally, the Thurlaston sites perform less well as there is a concern regarding impacts to the delivery of SW Rugby. Also, these sites could be less well-suited to delivering Gypsy and Traveller pitches, which is a possibility indeed a proposal at the other sites.

Overall, there a number of competing considerations and it is difficult to reach an overall conclusion, hence the scenarios are judged to perform on a par.

- **Economy / employment** – there is a clear preference for directing new strategic employment land to the edge of Coventry, reflecting: A) the merits of locating employment land in proximity to Coventry itself; and B) the fact that east / south east Coventry is already a major hub for employment and research / development across key sectors, including relating to the [West Midlands Investment Zone](#). The implication of (B) is that new strategic land directed here will be well placed to deliver a mix of employment uses, likely to include an element of B8 but not overly dominated by B8. A final factor is then that Prologis/Mountpark is a larger site relative to Walsgrave Hill (after having factored in developable areas / proposed country parks) and there is a case for supporting higher growth (see Section 5.2).

Also, with regards to scale of growth, a key point to note is that the two Thurlaston sites in combination would deliver significantly less employment land than any of the other three variable sites, and the effect would be that the Local Plan would not be able to provide for: A) the regional need for strategic sites apportioned to area 7 to 2042 in full; or B) any unmet need for non-strategic sites from Coventry.

With regards to significant effects, there is also a need to account for the employment land allocations that are held constant across the growth scenarios (of which one is permitted and two are somewhat committed, leaving Ansty Park North as the sole allocation that is entirely uncommitted). Overall, the three higher growth scenarios would each amount to a proactive strategy, particularly as the effect would be to provide for regional needs in respect of strategic employment land, but there is a strong preference for the edge of Coventry sites.

- **Historic environment** – Walsgrave Hill contains grade II listed Walsgrave Hill Farmhouse and is adjacent to Combe Abbey grade II* registered park and garden, which contains several listed buildings (grades I, II* and II) and a scheduled monument. However, there is understood to be good potential to avoid and mitigate impacts. Also significant is the historic environment sensitivity in respect of North of Houlton, with Heritage Impact Assessment (HIA) finding there to be a significance constraint and limited potential for mitigation. It explains:

“Development of the site risks harm to the setting of Dunsmore House [a Grade II listed late-19th century manor], through loss or erosion of its historic parkland, the key designed “set-piece” view, and/or the contributions of its wider rural setting. Views from and towards other non-designated heritage assets, including Dunsmore Hall Farm, Clifton Court, and Clifton Hall could be affected in a similar manner. Incongruous features could be introduced to views from the scheduled monument, creating further distractions to the panoramic viewpoint.”

Finally, the Thurlaston sites are close to two conservation areas but there would be separation, and it may be possible to avoid HGVs routing through the historic centre of Dunchurch. As discussed, there is a need to carefully consider long term growth strategy for this area accounting for nearby South West Rugby.

In conclusion, there is a need to flag a concern with Walgrave Hill given the significance of the designated assets ahead of consultation on mitigation.

- **Landscape** – Walsgrave Hill (Scenario 1) has the highest landscape sensitivity (“medium”), but work has been completed that shows the potential for mitigation to reduce sensitivity to “medium / low”. North of Houlton is located outside of the Green Belt and has low landscape sensitivity. However, development would urbanise an otherwise quite rural landscape. Whilst there is some adjacent built form, and it would be possible to draw upon topography and Lilbourne Road for some containment, the possibility of ongoing ribbon development along the A5 can be envisaged. The Thurlaston sites risk eroding the landscape gap between Rugby and Thurlaston / Dunchurch, also noting residential wider employment options in this area. Finally, Prologis/Mountpark is quite well contained and adjacent Prologis Park and strategic road infrastructure act as major urbanising influences.
- **Resources** – focusing on agricultural land quality, from the nationally available low resolution dataset it seems that Prologis/Mountpark is least likely to comprise BMV agricultural land. Walsgrave Hill is the only site to have been surveyed in detail, with this finding the site to mostly comprise grade 3b quality land (non-BMV) but also to include some limited areas of grade 3a and grade 2 quality land.

Overall it is difficult to differentiate between the scenarios with confidence.

- **Transport** – there are well established concerns regarding Prologis/Mountpark in light of the Strategic Transport Assessment (2025), as discussed, whilst Walgrave Hill is comfortably the best performing site. From the Site Selection Topic Paper:

“The site currently ranks moderately well for accessibility and is proximate to a future workforce in Coventry but there is potential create excellent access by active travel modes, in particular to the new residential area on the opposite side of the A46. It does not create the same degree of highways impacts as [Prologis/Mountpark] and its delivery is not contingent on delivery of uncommitted National Highways junction upgrades [North of Houlton]. It benefits from upcoming improvements on the A46 and has potential to be linked to Coventry’s Very Light Rail in the future, offering good non-car modes of access. The creation of a blue light route to the hospital is also a significant opportunity.”

With regards to North of Houlton, whilst there would be potential to link to Houlton and a new Rugby Parkway station to the south, the site is distant from Coventry, and the Strategic Transport Assessment (2025) identifies significant queue impacts and development of the site would be dependent on improving the A5/A426 Gibbet junction, raising deliverability risks. Finally, at Sites 18/133 the concern is around in-combination impacts with committed growth at SW Rugby.

- 6.3.4 Overall, all of scenarios have pros and cons and it is for the Council to weigh these in the balance. It can be noted Scenario 4 arguably performs poorly overall, but this would be less the case if the two sites (or just one of them) were allocated *in addition* to Walsgrave Hill rather than in place of it. However, it should not be assumed that this would be the best performing *addition* to Walsgrave Hill, as other options could be considered including small sites (as referred to above), or reduced versions of other omission sites considered at Ryton-on-Dunsmore or North of Houlton, for example.

7. The preferred approach

7.1 Introduction

- 7.1.1 The aim here is to present the response of RBC officers to the two appraisals presented above and, in turn, to explain why the proposed submission approach is justified.

7.2 Housing

- 7.2.1 The appraisal shows the proposed submission approach (Scenario 1) to suitably well overall, albeit alternatives are shown to have merit in certain respects.
- 7.2.2 In terms of growth quantum, the proposed approach provides for local housing need (LHN) in full to 2042, and there are limited strong arguments to be made for higher growth. In particular, the appraisal shows there to be clear drawbacks to scenarios involving higher growth via support for a new large scale strategic site. In this respect the appraisal draws on and adds to the evidence provided in the Strategic Transport Assessment and Viability Study.
- 7.2.3 Officers would highlight the ongoing delivery of the strategic sites at South West Rugby and Houlton and Rugby's historically high rates of recent growth, together with high-level of public concern about infrastructure keeping pace with growth, as further strong arguments against high growth scenario.
- 7.2.4 The weak performance of the high growth scenarios also weakens the case for extending the plan period and supports the council's view that decisions about longer-term strategy for the mid 2040s and beyond are better taken by the successor unitary authority in the context of a strategic development strategy, the new plan-making system and new national policy.
- 7.2.5 The appraisal finds there to be limited case to be made for scenarios involving non-allocation at Long Lawford, which is helpful in terms of demonstrating that there are exceptional circumstances for Green Belt release here. The appraisal highlights that there is a case to be made for additional growth outside of the Green Belt to the south of Rugby, potentially with a view to not releasing Green Belt at Long Lawford, but there are also clear constraints to growth in this area, given the Rainsbrook Valley and proximity to the committed strategic urban extension at South West Rugby. This echoes public concerns about these options highlighted through the Regulation 18 consultation, and ties in with new evidence landscape evidence gathered since that consultation.

7.3 Employment land

- 7.3.1 Whilst the appraisal finds all of the scenarios to have pros and cons, the proposed submission approach (Scenario 1) is shown to perform most strongly in transport terms and is also shown to be one of the two best performing scenarios in terms of delivering on economy / employment land objectives. These are two key factors such that, overall, it is possible to conclude that Scenario 1 best represents sustainable development.
- 7.3.2 This supports the council's exceptional circumstances case. Overall, it is considered that Scenario 1 provides the greatest level of opportunities both in economic terms and for wider community benefits while raising fewer transport concerns than the alternative scenarios. In particular, the submission approach has potential to deliver sustainable transport to a large workforce that is superior to other scenarios.
- 7.3.3 A further consideration is the possible higher growth scenario involving Scenario 1 plus additional employment land allocated in the Thurlaston area (a scenario that is not formally appraised but is discussed above at para 6.3.4). However, this approach is not supported given the weak strategic case plus local sensitivities around: maintaining a settlement gap to Thurlaston and Dunchurch; the need to deliver and mitigate the impacts of South West Rugby; and the constraints on this part of the highway network.

Part 2: SA findings at this stage?

8. Introducing Part 2

8.1 Overview

- 8.1.1 The aim here is to present an appraisal of the current Proposed Submission Local Plan.
- 8.1.2 In practice, the appraisal builds upon the appraisal of Scenario 1 in Section 6.2 (Housing growth scenarios appraisal) and Scenario 1 in Section 6.3 (Employment growth scenarios appraisal). Specifically, added consideration is given to:
- site allocations that are a 'constant' across the growth scenarios; and
 - thematic and site specific policies.

8.2 Introducing the plan

- 8.2.1 The plan document presents policies under the following headings: Strategy; Climate; Economy; Centres; Environment; Housing; Wellbeing; Design; Infrastructure.
- 8.2.2 A focus of the appraisal is naturally on the proposed 'strategy', because it is this aspect of the Local Plan that is associated with greatest potential to generate significant effects; however, consideration is also given to how other policies will serve to mitigate the impacts of growth and ensure that growth-related opportunities are realised.
- 8.2.3 The plan document presents the following overview of the strategy:

"This spatial strategy for development of homes and employment land in the borough in the period 2025-2042 is illustrated by the key diagram (below).

The housing requirement is set at local housing need calculated using the government's standard method. Of the requirement for 10,812 new homes (636 per year) 2025-2042, 7,993 (74%) already have planning permission or were allocated for development in the Local Plan 2011-2031. Of these, 7,279 will be delivered in three major expansions to Rugby at Houlton, South West Rugby and Eden Park.

New land allocations for 2,886 homes are made through this plan. Overall supply of 11,729 homes is identified against a housing requirement of 10,812, giving an 8.5% whole plan supply buffer to ensure the plan is effective.

New supply includes 698 homes within the Rugby urban area and 535 homes on further expansions to Rugby, which, as the only town within the borough, remains the focus for new housing, accommodating over 75% of new homes.

Allocations are made for 1,653 homes at the borough's rural settlements, including the main rural settlements of, Brinklow (325 homes), Binley Woods (43 homes adjacent to Binley Woods within Brandon & Bretford Parish), Clifton upon Dunsmore (150 homes), Ryton-on-Dunsmore (37 homes), Stretton-on-Dunsmore (113 homes), Wolston (95 homes), and Wolvey (210 homes). These villages mostly lie within the Green Belt and alterations to Green Belt boundaries are made. The main rural settlements provide the greatest range of rural services and new housing will support village sustainability.

To the south of the main rural settlement of Long Lawford, on Rugby town's western edge, a larger allocation of 650 homes is planned. This will sustain the village school, deliver new amenities and enhance walking, cycling and public transport links into Rugby.

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

Rugby Borough's central location within the road and rail network drives strong demand for industrial and distribution land, much of it from inward investment.

The strategy for employment land will deliver 1,034,000m² of new industrial and warehousing floorspace 2025-2042 (approx. 287 hectares). Of this, 540,000m² (815,000m² if Crouner Fields Farm, which has planning permission is included) comprises new land allocations through this plan.

The strategy for employment land will deliver all of Rugby Borough's assessed local industrial land need together with sub-regional large site requirement for Opportunity Area 7 (M6/A45/A46/M45 Coventry & Rugby) to 2042 as identified in the West Midlands

Strategic Employment Sites Study 2024 as updated through the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper 2024 and subsequent 2025 addendum. Additionally, the identified employment supply allows a contribution of 2.5ha to be made to meeting Coventry's unmet local need.

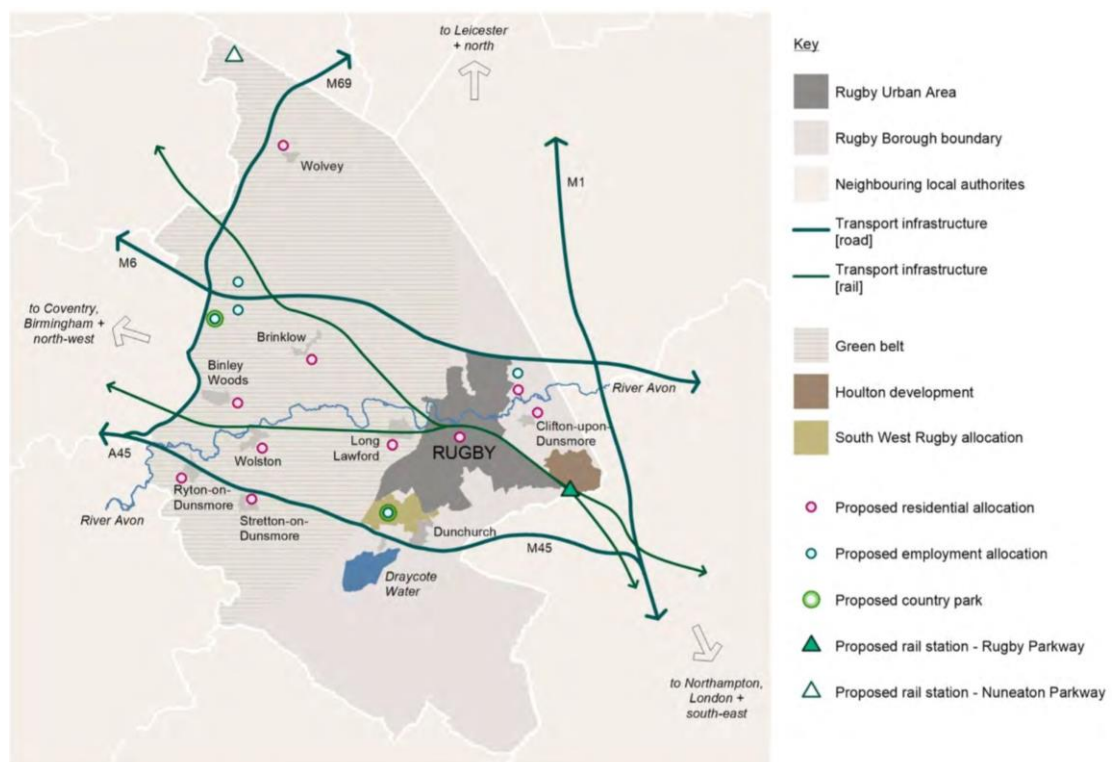
New employment land is focussed on the edges of Rugby and Coventry, as the main centres of labour, as expansions to existing employment areas with good access to main roads, active travel and public transport. This includes new allocations at the town's main junctions with the strategic road network: Coton Park East close to M6 Junction 1 and South West Rugby at the M45/A45 Thurlaston interchange.

The largest allocation is for development to the west and north of regionally-significant Ansty Park on the edge of Coventry, accessed from M6 Junction 2/M69 and the new A46 Walsgrave Junction. This will deliver a combined 365,000m² of new floorspace, a 75ha expansion to Coombe Abbey Country Park, a new walking and cycling route to Coventry, a new blue-light access to University Hospital Coventry and Warwickshire and a potential route and depot for the planned first Coventry Very Light Rail line.

Although employment allocations are focused on large sites with access to the strategic road network, the Coton Park East and Walsgrave Hill (west of Ansty Park) sites also include requirements to deliver smaller units for SME businesses, while the northern expansion to Ansty Park will be ringfenced for research and development uses.

Finally, the plan is the first Local Plan for Rugby Borough to allocate sites for Gypsy and Traveller pitches. The Gypsy and Traveller Accommodation Assessment 2025 (GTAA) identifies a need for 94 pitches (1 April 2024 to 31 March 2042) and supply is identified for 68 pitches, sufficient to cover the period to 2035."

Figure 8.1: The Local Plan Key Diagram



8.3 Appraisal methodology

- 8.3.1 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each sustainability topic the aim is to discuss the merits of the draft Local Plan, as a whole, before concluding on significant effects.
- 8.3.2 Specifically, the regulatory requirement is to “identify, describe and evaluate” the significant effects of “the plan” taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. effects can be short or long term, and where an “effect” is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the plan. The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. in respect of net zero). Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the plan will be implemented and the effect on particular ‘receptors’. The appraisal aims to be systematic and to explain evidence/assumptions. However, there is also a need for conciseness and accessibility (this is a key focus of SA reform).

9. Appraisal of the Local Plan

9.1 Introduction

- 9.1.1 The appraisal is presented below as a series of narrative discussions under the SA framework / with reference to the SA scope (Chapter 3). Each narrative begins by recapping the preferred growth scenario (**Scenario 1**) appraised in Part 1 (Chapter 6).

9.2 Accessibility

- 9.2.1 The appraisal of growth scenarios in Section 6 is strongly supportive of the housing growth strategy, and focusing on changes made since the Draft Plan stage there is support for the reduced focus on more rural villages, including accounting for comments received from the County Council and the NHS Integrated Care Board, and the added focus of growth at Long Lawford. Also, there is support for the new focus of growth in the Rugby urban area, although there is a need to recognise that urban site can face viability challenges with implications for the contributions that can be made to infrastructure. Finally, it is important to note that the situation regarding schools capacity issues / opportunities has evolved considerably since the Draft Plan stage, and overall the adjusted spatial strategy performs well in this regard, although this is a matter for ongoing consideration and close monitoring in some parts of the Borough.
- 9.2.2 Focusing on aspects of the spatial strategy that are held constant across the growth scenarios appraised in Section 6, perhaps the key point to note is the new proposed lower growth strategy for Wolvey. However, there is still significant growth directed to the village (210 homes) and the proposal is still to support a fairly high growth strategy at another one of the more rural villages, namely Brinklow (325 homes).
- 9.2.3 With regards to employment land, the appraisal in Section 6.3 is strongly supportive of the preferred strategy, because Land at Walsgrave Hill would deliver a 75ha country park adjoining Coombe Abbey Country Park.
- 9.2.4 With regards to site specific policy, a clear and well-targeted approach to setting out requirements for directing limited funds / making use of limited land (in the context of potentially challenging development viability) is to be commended. Policies set requirements in respect of:

- Public rights of way (12 sites).
- Pedestrian crossings or footways to ensure safe access (around 10 sites).
- Travel links in support of active travel (around 15 sites).
- Children's play areas (five sites, and in once case this must be a 'central feature').
- Allotments / community orchards (two sites).

9.2.5 Also, it is noted that there is support for higher density development at Land south of Crick Road, Houlton, which is set to be a highly accessible location.

9.2.6 Finally, with regards to DM policy, there are a range of policies that are broadly supportive of accessibility objectives, but these are mainly fairly generic policies that need not be a focus of appraisal. No policies stand-out as giving rise to a tension with accessibility objectives, although car parking policy is always a policy area that generates interest and warrants ongoing scrutiny.

9.2.7 Two specific policies for consideration are:

- Policy W2 (Open space and sports provision) – Figure 9.1 serves to highlight the benefit in supporting larger sites that may be able to deliver new facilities as opposed to contributing funds that are then pooled to deliver facilities offsite.
- Policy C1 (Rugby town centre) – is presented below in full. It is noted a Rugby Central Supplementary Planning Document (SPD) has also been [drafted](#).

9.2.8 In conclusion, the plan is predicted to give rise to a **'moderate or uncertain' positive effect** on the baseline. Whilst the proposal at the Draft Plan stage was to deliver a new secondary school this is no longer the case. The following recommendation was made within the Interim SA Report at the Draft Plan stage and still holds true to some extent:

"Moving forward it will be important to give further detailed consideration as to how best to realise growth-related opportunities through spatial strategy / site selection; ensuring that comprehensive growth is supported ahead of piecemeal growth as far as possible; and setting clear site-specific policy so that developers understand local priorities in the context of development viability."

Figure 9.1: An extract from Policy W2

W2 Open space and sports provision

A. Residential development of 10 or more dwellings shall, through on-site provision or contributions, meet the open space standards set out below:

Typology	Area per 1,000 residents	Access distance (straight line)
Provision for Children & Young People	0.2ha	400m (LEAP) 1,000m (NEAP) 1,000m (Young People)
Natural & semi natural green spaces	2.5ha	700m
Parks & recreation grounds	1.25ha	700m
Amenity green spaces	1.27ha	300m
Allotments	0.65ha	800m
Rugby union	0.24 pitches	N/A
Adult football	0.22 pitches	N/A
Youth football	0.45 pitches	N/A
Mini soccer	0.37 pitches	N/A
Hockey	0.02 pitches	N/A
3G	0.05 pitches	N/A
Cricket	0.1 pitches	N/A

Figure 9.2: Policy C1 and supporting text in full

C1 Rugby town centre A. Development up to 2042 in Rugby town centre (as shown on the policies map) will include: i. the redevelopment of Rugby Central Shopping Centre to restore street-based, mixed-use development (see development sites annex); ii. "the Stitch" comprising downgrading for traffic of North Street and part of Church Street and a refreshed Market Place public square; iii. redevelopment of Herbert Grey College for residential development; iv. a new mixed-use hub with a public square at Old Market Place as part of a cultural quarter; and v. a new apartment living quarter in the Station Gateway character area surrounding Rugby Station. B. Development in Rugby town centre shall accord with the following placemaking principles: i. support the town centre's role as a leisure and entertainment destination including a wide-ranging food and beverage offering;	ii. create new and improved cycle and pedestrian links, both within the town centre and to surrounding neighbourhoods; iii. avoid prejudicing the delivery of the comprehensive redevelopment opportunities which are set out in the Delivery Plan for the Town Centre; iv. front onto and provide active ground floor frontages to the town's street network; v. deliver public realm improvements that accord with the Town Centre Public Realm Masterplan; vi. deliver high quality urban living; and vii. support the enhancement of heritage buildings. 4.1 The Town Centre Uses Study (Nexus Planning, 2024) highlights the challenges facing Rugby Town Centre. The Town Centre Public Realm Masterplan (2024) sets a framework for public realm enhancements. The Town Centre Delivery Plan will provide a delivery route for key opportunity areas in the town centre. 4.2 Placemaking principles for allocated sites are set out in the Development site allocations annex. A Supplementary Planning Document is being prepared for Rugby Central Shopping Centre.

9.3 Air quality

- 9.3.1 The appraisals in Section 6 are supportive of the growth strategy, including the proposal to limit growth at Rugby and Dunchurch and to direct growth to Long Lawford, which is quite well connected in transport terms. It can also be noted that the new proposed approach is to support a shorter plan period (to 2042 rather than 2045), which is supported in that longer term strategy for growth must take careful account of the transport and air quality constraints affecting the Borough, and that future plan-making under Local Government Reform and Devolution will provide a good forum for this.
- 9.3.2 With regards to aspects of the growth strategy that are not a focus of the appraisals in Section 6 on account of being held constant across the growth scenarios, one point to note is that directing employment land to North of Ansty Park is supported given excellent connectivity to the strategic road network (SRN), and it may be that enabling the Park to grow / reach a critical mass is supportive of bus connectivity enhancements; however, the Park is quite distant from a train station.
- 9.3.3 It is also appropriate to flag directing further employment land to SW Rugby Employment Phase 2 as giving rise to tensions with transport / air quality objectives although, on the other hand, the effect will be to help facilitate delivery of major road / transport upgrades (and it is important to recall that this is an existing reserve site).
- 9.3.4 Site specific policies do not reference air quality, which is reasonable and appropriate given a need for concise policies targeted at key issues / opportunities, whilst numerous DM policies are supportive of transport objectives and, in turn, air quality objectives.
- 9.3.5 Air quality is, however, a focus of Policy EN9 (Air Quality), which is presented below in full. The policy requirements are likely suitably stringent in the context of a Borough with significant air quality constraints. However, there is a need to acknowledge that providing the necessary evidence could prove costly to the point of impacting development viability at some sites, particularly smaller sites.
- 9.3.6 In conclusion, the plan has been developed with a strong focus on minimising traffic congestion which is a key consideration with a bearing on poor air quality. Poor air quality is significant issue locally, as discussed, but the situation is improving nationally. Overall a **neutral effect** on the baseline is predicted.

Figure 9.3: Policy EN9 in full

EN9 Air quality	
A.	Development throughout the borough of more than 1,000m ² of floorspace or 10 or more dwellings and development within the Air Quality Management Area that would generate any new floorspace must:
i.	achieve or exceed air quality neutral standards, or
ii.	address the impacts of poor air quality due to traffic on building occupiers, and public realm or amenity space users by reducing exposure to and mitigating their effects, proportionate to the scale of the development.
B.	The impacts of poor air quality can be reduced through:
i.	the orientation and layout of buildings;
ii.	abatement technologies; and
iii.	urban greening.
C.	Where air quality neutral standards are not met, measures to offset any shortfall will be required, according to the following hierarchy:
i.	on-site measures; then
ii.	off-site measures; then
iii.	financial contributions.

9.4 Biodiversity

- 9.4.1 The appraisal of housing growth scenarios in Section 6.2 does not flag a concern but suggests a possible case for supporting higher growth given clear potential to direct growth to locations with limited / low biodiversity constraint in the context of a wider sub-region where biodiversity is a notable constraint to growth.
- 9.4.2 The appraisal of employment land growth scenarios in Section 6.3 does not raise a major concern but acknowledges that Land at Walsgrave Hill is in proximity to Smite Brook / Coombe Pool to the south, and the associated SSSI that covers this area. There is good potential for mitigation and potentially enhancement of the river corridor.
- 9.4.3 As for aspects of the growth strategy held constant across the growth scenarios:
- Binley Woods / Wolston / Ryton-on-Dunsmore – the proposed low growth housing strategy is of note as this part of the Borough is arguably most sensitive in biodiversity terms.
 - Brinklow – there are limited sensitivities to the south of village, where the new proposed approach is to reduce the scale of growth. The adjacent smaller allocation for 75 homes is sensitive on account of an adjacent Local Wildlife Site (LWS) but is predominantly previously developed land. The LWS constraint could potentially warrant consideration through site specific policy.
 - Clifton-upon-Dunsmore – the strategy is unchanged and generates few concerns.
 - Long Lawford – the new proposed higher growth strategy is supported.
 - Stretton-on-Dunsmore – biodiversity is not a major factor with a bearing on key choices to the west of the village and the other proposed allocation is unchanged from the Draft Plan stage. This is a more sensitive site but is set to deliver significant new greenspace, plus site specific policy requires: *“Retention of existing mature trees and hedgerow on Fosse Way except to allow for creation of access.”*

- Wolvey – is overall somewhat sensitive on account of a close association with the River Anker corridor. As such, there is potentially support for the new lower growth strategy, although the main change is to reduce growth to the south of the village, where there is relatively limited sensitivity, and there is also a need to consider whether growth could potentially deliver some enhancements. The one allocation that is unchanged since the Draft Plan stage is notably adjacent to the river corridor.

9.4.4 Finally, with regards to allocations, SW Rugby Employment Phase 2 is notably constrained by adjacent Cawston Spinney, and careful consideration has been given to the matter of balancing employment land and open space – see Figure 9.4.

Figure 9.5: Concept masterplan for SW Rugby Employment Phase 2



9.4.5 With regards to site-specific policy, there could be the potential to add further requirements in respect of accounting for adjacent or onsite constraints. However, there is also a need to avoid unduly hindering site masterplanning and, in turn, site delivery in the context of potentially challenging development viability and wider objectives.

9.4.6 Finally, with regards to DM policy, a key point to note is a proposal not to require a level of BNG over-and-above the statutory minimum. It is not uncommon for local plans nationally to require 20%, but understanding nationally regarding implications for development viability and site delivery more widely (given practical challenges around securing biodiversity ‘credits’ where the requisite net gain cannot be achieved on site) is still evolving at the current time, and the new Draft NPPF (2025) is supportive of ensuring a level playing field nationally in respect of required “standards”.

9.4.7 In conclusion, there are no major concerns, but the focus of employment land growth to the east of Coventry is a matter for ongoing consideration, plus are several sites subject to a degree of constraint that warrant ongoing scrutiny. Overall, the Draft Local Plan is predicted to have a **neutral effect** on the baseline (a situation is one whereby development would continue to come forward without the benefit of an up-to-date plan).

N.B. a final consideration is Habitats Regulations Assessment (HRA), which focuses on the risk of impacts to internationally designated sites. The HRA (2025) concludes:

- “Taking into consideration the protection that Local Plan policies... give to water quality, outputs of the water quality modelling, and the location of allocations, it can be concluded that there will be no [significant impacts] as a result of the Local Plan either alone or in-combination on the Severn Estuary SAC and Ramsar.”
- “Taking into consideration the distance between the SAC and the nearest residential allocation, threats and pressures identified by Natural England at the SAC, the availability of accessible alternative recreational spaces and legal angling sites in and around the Plan area, and the policies within the Plan designed to ensure open space provision accommodates future growth set out in the Local Plan (including new Country Park provision), it can be concluded that the Local Plan will have no [significant impacts] due to recreational pressures on Ensor’s Pool SAC...”

9.5 Climate change adaptation

- 9.5.1 Focusing on flood risk, as a key climate change adaptation consideration, the appraisal of reasonable alternative growth scenarios in Section 6 does not flag any major concerns. Potentially of primary importance will be confirming that Land at Walsgrave Hill, which is a major new strategic employment allocation, can be brought forward whilst avoiding development in the flood zone and avoiding the worsening of downstream flood risk (the potential to achieve a betterment might be explored).
- 9.5.2 With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, flood risk is not thought to be a significant constraint at any of the sites in question. However, the new proposed urban allocations will warrant scrutiny ahead of plan finalisation because there can be pressure to accept a degree of flood risk when intensifying uses in urban areas (i.e. support for residential at sites that have historically be seen as appropriate for less sensitive uses).
- 9.5.3 North of Ansty Park is also notable as a large employment site that is adjacent to a fluvial flood zone, with some flood risk affecting an employment area in Coventry distance downstream, but there should be good potential to avoid development intersecting the flood zone and to deliver Sustainable Drainage Systems (SuDS).
- 9.5.4 None of the site-specific policies reference flood risk or sustainable drainage, but this does not necessarily generate any concerns (to be confirmed following consultation with the EA). There are then area-wide DM policies covering flood risk, sustainable drainage and climate change adaptation, but all are fairly standard policies (in the context of forthcoming National Development Management Policies) and a policy requiring canopy cover (Policy EN6) which may be beneficial to climate change adaptation.
- 9.5.5 In conclusion, directing growth away from areas of flood risk sensitivity has been a key factor influencing site selection, although there remain some minor questions at the current time ahead of further work on masterplanning. A **neutral effect** is predicted.

9.6 Climate change mitigation

- 9.6.1 The appraisal in Section 6.2 is supportive of the proposal to direct growth to greenfield sites with strong viability credentials, but overall there is a potential that development viability could on occasion be a barrier to delivering net zero developments.
- 9.6.2 Policy CL1 (Net Zero Buildings) is clearly of great importance, and is strongly supported, but there is a need to recognise that DM policies will often not be fully implemented on viability grounds, e.g. to allow for affordable housing to be prioritised. The policy is highly commended for its conciseness and clarity, with it being a well-understood issue nationally that equivalent policies can be complex such that, in turn, implementation can be challenging (particularly for smaller developments), and it can be a challenge to effectively scrutinise and evaluate the performance of planning applications. It is noted that the Draft NPPF (2025) does not support local net zero development policies, instead suggesting reliance should be placed on Building Regulations, but the policy drafted here involves an alternative metric that is very strongly supported.

- 9.6.3 In conclusion, whilst it is difficult to conclude that built environment decarbonisation has been a strong focus of spatial strategy / site selection, close consideration has been given to supporting sites with strong development viability credentials such that there is confidence in the ability for allocations to come forward in accordance with Policy CL1, i.e. come forward as net zero development. It is also the case that the Council has not committed to achieving net zero development borough-wide by a particular date (e.g. 2030 as is quite common amongst local authorities nationally) such that, on balance, it is considered appropriate to predict a **neutral effect** on the baseline.

Figure 9.6: Policy CL1 and supporting text in full

CL1 Net zero buildings

- A. New buildings comprising one or more dwellings and new non-residential buildings of 100m² gross internal area or more must be designed and built to be net zero carbon in operation. To achieve this, new buildings must:
- be ultra-low energy,
 - be fossil fuel free (except where the use of fossil fuels is technically necessary for emergency and life-safety systems or essential systems serving buildings with critical functions), and
 - generate at least the same amount of renewable electricity on-site as the electricity they demand over the course of a year, such demand including all regulated and unregulated energy use, or
 - if iii is not technically achievable for a particular building typology in its context, on-site renewable energy generation shall be fully maximized as practicable. A reasonably practical maximum PV generation shall be 120kWh per square metre of building footprint per year, or solar PV panels of an area equating to 70% of the building's footprint. Where it is claimed that the fullest practicable extent is less than this, this must be justified by evidence demonstrating why

a reduced amount is proposed and what design steps have been taken to strive to achieve this policy's stated target.

- B. To help achieve criterion A.i. above, new dwellings shall achieve:
- a maximum space heating demand of 30kWh/m²/yr; and
 - total Energy Use Intensity (EUI) of no more than 40kWh/m²/yr.
 - On major housing developments, the EUI requirement in (ii) above may be achieved as a site wide average provided that no single dwelling exceeds an EUI of 60kWh/m²/yr.
- C. To help achieve criterion A.i. above, new build non-residential buildings shall achieve:
- a maximum space heating demand of 20kWh/m²/yr; and
 - a maximum total EUI of 70kWh/m²/yr for schools and offices; or 35kWh/m²/yr for warehouses and light industrial uses (without refrigeration/conditioning); or a maximum regulated-energy-only EUI of 40kWh/m²/yr for all other uses.
- D. Proposals that are built and certified to Passivhaus Classic or a higher Passivhaus standard will be deemed

to meet space heating demand and EUI requirements under paragraph B and/or paragraph C. Demonstration of compliance with the requirements in paragraph A for development to be fossil fuel free and for onsite annual renewable energy generation capacity to at least equal annual energy demand will still be required.

- 2.1 Building Regulations (specifically Part L) set minimum standards for the energy efficiency of buildings. The Future Homes and Future Buildings Standards are expected, but it is anticipated that these standards will not result in buildings which are net zero carbon. Instead, they will make new buildings net zero carbon 'ready', so that they can become net zero as the national energy grid decarbonizes. In Rugby Borough we want to go further and faster, to achieve net zero carbon development at the earliest opportunity.
- 2.2 A net zero building produces at least as much energy as it uses over the course of a year. This is achieved through a combination of measures to generate renewable energy on site whilst reducing the overall energy demand of the building, for example energy for heating and cooling the building, for generating hot water and for lighting.
- 2.3 To demonstrate how development proposals meet the requirements of this policy they must be accompanied

by an energy statement. The energy statement must detail assured performance arrangements, including:

- 2.3.1. The submission of pre-built estimates of energy performance including the building specifications on which these are based (within which the predicted EUI and space heat demand must be calculated using an energy modelling method that is demonstrably accurate in its predictions of those metrics); and
- 2.3.2. Prior to each dwelling being occupied, the submission of updated, accurate and verified 'as built' calculations of energy performance.
- 2.3.3. In-use energy monitoring for the first 5 years of operation is required on a minimum of 10% of dwellings for development proposals of 100 dwellings or more, or a 10% representative sample of premises for non-residential development of 10,000m² (gross internal area) or more.
- 2.4 The energy statement should employ accurate calculation methods. The methods PHPP and CIBSE TM54 will be considered acceptable. SAP and SBEM do not provide sufficiently accurate outputs, but there are free tools online that can adapt SAP outputs to be sufficiently accurate, such as Cornwall Council's "[Energy Summary Tool SAP v2](#)". Other methods may be considered by the council if shown to be accurate.

9.7 Communities, health and well-being

- 9.7.1 Work to appraise growth scenarios in Section 6 is supportive of the proposed submission strategy in absolute terms but flags a potential argument for replacing some growth at villages with a strategic urban extension to Rugby.
- 9.7.2 With regards to sites that are not a focus of appraisal in Section 6, a key point to note is that adjustments have been made to the growth strategy across a number of villages. As part of this, the concerns raised by the NHS Integrated Care Board and the County Council regarding a focus of growth at village have been taken into consideration.
- 9.7.3 Also, with regards to the employment land strategy, it is important to note that there remains a strong focus on delivering new strategic green infrastructure and also Gypsy and Traveller pitches. However, the new proposed approach is not to deliver pitches at Coton Park East employment site, which warrants ongoing consideration.
- 9.7.4 Finally, there is a new focus on local landscape and settlement separation designations, including accounting for concerns raised through consultation.
- 9.7.5 With regards to area-wide DM policies, there are extensive requirements aimed at ensuring that development comes forward in line with communities, health and well-being objectives, including the site-specific policy requirements discussed above under the 'accessibility' heading. Key area-wide policies of note are:
- W1 (Protection of Community Facilities) – amongst other things explains: *“The council supports the restoration of Coventry Stadium, Brandon for speedway and stock car racing and other motor sports together with other community uses.”*
 - W2 (Open Space and Sports Provision) – sets out clear quantified requirements, which are then supplemented through site-specific policy as appropriate.
 - H7 (Housing standards) – is an important policy as there are implications for development viability. Matters have been carefully considered, informed by a Nationally Described Space Standard Report (2025), which concludes:
“... out of 1637 total properties (increasing to 1652 if PR24/0390 is approved) 955 of these are below the NDSS, and 682 (697 with PR24/0390) are in line or above. This equates to 58.34% (57.81% PR24/0390) below and 41.66% (42.19% PR24/0390) above. Affordable properties are particularly likely to be below the standard, with all but 1 of the 375 looked at falling short (99.73%).”
- 9.7.6 In conclusion, whilst it is recognised that there are some local concerns, the proposed approach to spatial strategy / site selection has a clear focus on minimising negative effects and realising opportunities. The Council took the voluntary step of consulting on a full Draft Local Plan under Regulation 18, and it is clear that issues raised have fed into the Proposed Submission Plan. Overall, it is considered appropriate to predict a **'moderate or uncertain' positive effect** on the baseline (a situation whereby development continues to come forward in the absence of an up-to-date Local Plan).

N.B. evidence and understanding also comes from the Equalities Impact Assessment (EqIA) that is published alongside the Local Plan. From the EqIA it is noted that impacts to groups with protected characteristics are judged to be positive and mostly of limited significance. A more significant cause / effect relationship is highlighted between the Local Plan and those with disabilities, with the EqIA concluding:

“There are a wide range of needs amongst people living with disability... All of these matters which are relevant to the local plan, which seeks to provide accessible, healthy and inclusive streets, spaces/public realm, open spaces and buildings. Evidence was developed as part of the HEDNA and updated in the Housing Needs Report (2025) in relation to housing needs for people with disabilities. In response, the plan includes policies and allocations for specialist housing, with links identified between age and disability. In addition, policy H7 sets out standards for new housing, including adaptable buildings, and meeting requirements for wheelchair users.”

9.8 Economy and employment

- 9.8.1 The appraisal of growth scenarios presented in Section 6 is very strongly supportive of the proposed growth strategy. The entirely non-committed allocation that is not a focus of the appraisal in Section 6 is North of Ansty Park, which is very strongly supported as uses can be 'ring fenced' to B2, E(g)(ii) and E(g)(iii) and there is a need to build on the success of Ansty Park. In combination with adjacent Walsgrave Hill (discussed in detail in Section 6) and Crowner Fields Farm (permitted), there is excellent potential to enhance this sector of the Coventry edge as a regionally significant employment area.
- 9.8.2 With regards to South West Rugby Employment Phase 2, whilst it is an existing reserve site, there is a need to balance: A) a desire to deliver employment land in well-linked location and support the viability of the wider South West Rugby development; with B) biodiversity and landscape constraints, including relating to adjacent Cawston Spinney.
- 9.8.3 With regards to Coton Park East, it is noted that this is sloping land which can be a constraint to delivering B8 units, but a planning application is now nearing submission (<https://cotonparkeast.co.uk>) the site is set to be delivered by a major operator and the new proposal not to require Gypsy and Traveller pitches could assist with delivery.
- 9.8.4 Finally, with regards to the seven area-wide policies presented under the 'Economy' and 'Centres' headings within the Local Plan, most are quite standard policies that need not be a focus of appraisal, but the Rugby Town Centre policy is clearly of note for reflecting a targeted approach to addressing specific issues / realising opportunities. On this point, it can also be noted that the plan now allocates significant sites in the town centre which did not feature at Regulation 18 stage, and a Town Centre SPD has been drafted.
- 9.8.5 One DM policy of note is Policy I4 (Infrastructure and planning obligations) which requires: *"Developments of 50 or more homes and commercial developments of 10,000m² or more in floorspace will be required to provide employment and skills plans to deliver opportunities for local residents to access employment and training."* This may well be justified in the Rugby context, but it is noted that a similar policy has recently come under scrutiny as part of the Bristol Local Plan Examination in Public, with an [Inspector's Letter](#) (November 2025) questioning justification and effectiveness.
- 9.8.6 In conclusion, a **significant positive effect** is predicted. The proposed strategy involves making provision for a large-than-local need and reflects a clear vision including supporting mixed use strategic employment sites well linked to Coventry.

9.9 Historic environment

- 9.9.1 The appraisals in Section 6.2 acknowledges that there will be some historic environment impacts as a result of the housing growth strategy, but these are overall of limited significance, and it is not possible to identify an alternative strategy that is preferable in terms of historic environment objectives. With regards to the employment land strategy, the new proposal to support Walsgrave Hill does give rise to a degree of tension with historic environment objectives, but there is good potential for mitigation, and overall there is confidence that a suitably strategic approach is being taken to growth along this sector of Coventry's edge with a long term perspective.
- 9.9.2 With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, attention focuses on:
- Binley Woods – whilst the village is relatively unconstrained the new proposed allocation is in proximity to a grade II listed Ice House in Brandon Little Woods, as well as a cluster of grade II listed buildings in Brandon to the southeast.
 - Brinklow – is sensitive in historic environment terms but significant adjustments have been made since the Draft Plan stage aimed at avoiding impacts.
 - Clifton-upon-Dunsmore – one of the allocations (60 homes) is adjacent to the village conservation area and it is also important to note an omission site to the south that comprises the former grounds of Clifton Hall (albeit not listed).

- Stretton-on-Dunsmore – is sensitive in historic environment terms but the proposed allocations are mostly subject to limited constraint. One of the allocations has been closely examined to consider archaeological constraint.
- Rugby urban area – there are not known to be any major concerns regarding impacts, and there may be some opportunities to make good use of underutilised / unattractive sites with resulting historic environment benefits. However, this will be a matter for scrutiny through the current consultation / ahead of plan finalisation. It is noted that several of the site specific policies reference historic environment constraint, and so there is a need to consider implications for viability/delivery.

9.9.3 With regards to wider site-specific policy, there are a small number of references to historic environment sensitivities that must factor-in to site masterplanning and design. It is noted that site specific policy for the proposed 400 home allocation directly to the south of Long Lawford has been significantly adjusted since the Draft Plan stage, with a new requirement as follows:

“Retain and reuse the 19th century L-plan building to the southwest of Avon Lodge if it is found to be of historical interest. Layout to provide some open space buffer to the listed farmhouse (Avon Lodge) and L-plan building (if retained).”

9.9.4 In conclusion, whilst the proposed allocations will generate some historic environment impacts there is also a need to recognise that the baseline situation is one whereby there is ongoing pressure for growth under the presumption in favour of sustainable development. On balance a **neutral effect** is predicted. As part of this, it is noted that Historic England commended the Council through the Draft Local Plan consultation on the basis that “heritage considerations have been integral to the site selection process”.

9.10 Homes

9.10.1 The appraisal in Section 6.2 is strongly supportive of the proposed strategy. Whilst there is a theoretical case for higher growth, the case to be made for higher growth is overall quite limited. Changes made since the Draft Plan stage are overall strongly supported, including recognising limited case to be made for a longer plan period in the context of LGR and devolution, although it is important to note the potential for delivery challenges in respect of the new proposed higher growth strategy for the urban area.

9.10.2 Providing for Gypsy and Traveller accommodation needs is another key consideration and, in this regard, whilst the proposed submission plan represents a step change in terms of taking a proactive approach, there is a need for ongoing work to consider options for new sites and also ongoing work to consider the possibility of delivering additional pitches within strategic employment sites. Having said this, it is recognised that DM policy is supportive of ongoing supply from windfalls, particularly Policy S4 but also other relevant policies including I1 (Transport), D1 (Well-designed places), D3 (Landscaping) and EN8 (Environmental protection and amenity).

9.10.3 There are then a range of important area-wide DM policies, most notably Policy H2 (Affordable Housing) which requires:

“Developments that result in ten or more new homes (including conversions and subdivisions but excluding specialist older persons’ accommodation) shall provide at least the following proportion of new homes as affordable homes: i. Within the Rugby urban area 20%; ii. Elsewhere in the borough 30%; iii. On sites released from the Green Belt through this plan or other Green Belt permissions: 40%. The tenure mix of affordable homes should be 70% social rent and 30% shared ownership”.

9.10.4 There is little reason to suggest that there could be the potential to boost affordable housing requirements by accepting compromises elsewhere (e.g. net zero development), but this is a matter for ongoing consideration ahead of plan finalisation.

- 9.10.5 Another key policy is Policy H8 (Houses in multiple occupation) which seeks to respond to a Rugby specific issue (it is noted that the Draft NPPF, recently published in December 2025, does not include a national policy on HMOs). This is a specialist area of policy making such that it warrants ongoing scrutiny ahead of plan finalisation including with a focus on the needs of those who rely on HMOs for accommodation.
- 9.10.6 In conclusion, a **significant positive effect** is predicted. Whilst the strategy is slightly less positive relative to the draft plan stage, it remains strongly supported.

9.11 Landscape and townscape

- 9.11.1 With regards to housing growth the proposed strategy has been adjusted since the Draft Plan stage to account for key landscape sensitivities and is judged to perform well, but the new proposed allocation of Walsgrave Hill as a strategic employment site gives rise to a tension with landscape objectives (but there is good potential for mitigation).
- 9.11.2 With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, one consideration is Clifton-upon-Dunsmore, where there is a need to carefully consider long term growth strategy from a landscape perspective.
- 9.11.3 With regards to site specific policy, a key point to note is South West Rugby Employment Phase 2, where detailed consideration has been given to the scale of employment land versus the scale of greenspace as a buffer to Cawston Spinney.
- 9.11.4 The other key point to note is the new proposal to designate a landscape to the south of Rugby as locally significant and also to designate two settlement gaps on the edge of Rugby. This approach is strongly supported from a landscape perspective, but there is also a need to ensure that the effect will not be to unduly hinder strategic consideration of growth options aimed at delivering growth in a way that aligns with wider objectives.
- 9.11.5 In conclusion, whilst the equivalent appraisal at the Draft Plan stage predicted a 'moderate or uncertain' negative effect, this was explained as "potentially somewhat marginal" and the report stated: *"It should be possible to conclude a neutral effect following further work to consider site specific policy and feasibly also adjustments to site boundaries.it is now possible to conclude a neutral effect."* At this stage it is possible to conclude a **neutral effect**; however, a number of key areas in the Borough require ongoing consideration regarding how best to balance growth and landscape objectives looking ahead with a long term perspective.

9.12 Resources

- 9.12.1 The conclusion reached across Sections 6.2 and 6.3 is that there will be a loss of BMV agricultural land that is potentially significant, but it is difficult to confidently identify an alternative preferable strategy.
- 9.12.2 With regards to sites that are not a focus of appraisal in Section 6 (on account of being constants), one point to note is Clifton-on-Dunsmore, where the nationally available low resolution / accuracy dataset shows there to be significant grade 2 quality (BMV) agricultural land, particularly to the south and east of the village.
- 9.12.3 In conclusion, given the likely loss of BMV agricultural land it is appropriate to predict a **'moderate or uncertain' negative effect**; however, there is also a recognition that there could be similar or worse loss under a baseline scenario.

9.13 Transport

- 9.13.1 Work to appraise growth scenarios in Section 6 shows the proposed submission approach to spatial strategy / site selection to perform very well, and there is strong support for the adjustments made since the Draft Plan stage, informed by consultation responses received and the Strategic Transport Assessment (2025).

9.13.2 With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, attention focuses on:

- Ansty Park – well linked to the strategic road network, but distant from a train station although it is noted that Coventry City Council are promoting a railway station in the east of Coventry (albeit that proposal is at an early stage).
- Binley Woods – a village with a high settlement score, such that the new proposal to allocate at the village is tentatively supported.
- Brinklow and Wolvey – as rural villages the new lower growth strategy is overall supported in transport terms, although there is a need to recognise that growth can assist with maintaining/enhancing village facilities and bus services.
- Newton – a rural village, but with a good settlement score and close to facilities in Rugby. There is a need to consider growth in combination with Coton Park East.
- South West Rugby Employment Phase 2 – will help to deliver planned strategic road / transport upgrades, hence the reduced scale of growth can be questioned.
- Stretton-upon-Dunsmore – a village not directly linked to an A-road and with a ‘middling’ settlement score. Growth may support public transport enhancements, and the adjustment to the strategy since the Draft Plan stage is supported.

9.13.3 Transport objectives are then a key focus of area-wide and site-specific DM policy, and it is difficult to suggest any significant tensions with wider objectives. Site specific policy aimed at securing walking and cycle upgrades is of considerable importance, and overall there is support for a well-targeted approach. For example Site 59 at Newton:

- “Pedestrian and bicycle links to connect to and through Great Central Walk to link with Coton Park East.
- Provision of pedestrian footway and cycle track along Newton Manor Lane.
- The existing Public Rights of Way (PRoW) must be maintained, and the design of the development must ensure they are pleasant to use. Wherever possible PRoW should be routed through public open space, be segregated from roads, and be well overlooked. PRoW should be maintained on their existing lines, with diversions only occurring where this is not practicable. PRoW should be accessible to as many people as possible, including those who are disabled or less mobile.
- Provision of crossing facilities on Newton Manor Lane
- Pedestrian and cycle permeability through the site, including links to any new secondary school at St Thomas Cross.
- Measures to manage the speed of motor traffic on Newton Manor Lane.
- Contributions may be required towards delivery of cycle route network improvements identified in the Local Cycling and Walking Infrastructure Plan (LCWIP), including R01 (Coton Park East), and R46 (Great Central Walk between Crowthorns and Newton).
- Contributions may be required towards the A426/Newton Manor Lane scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve the partial signalisation of the roundabout, with signals added to the A426 North and A426 South approach arms and adjacent circulatory, as well as pedestrian crossing provision.”

9.13.4 In **conclusion**, at this stage it is considered appropriate to predict a **‘moderate or uncertain’ positive effect** recognising the extent to which transport has been a focus of spatial strategy / site selection and adjustments made since the Draft Plan stage,

9.14 Water

- 9.14.1 The appraisals in Section 6 do not flag any concerns and it is difficult to elaborate further here, other than by stating support for Policy CL3 (Water supply, quality and efficiency), which requires:

New dwellings shall demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling, as calculated in accordance with the methodology in the water efficiency calculator, does not exceed 110 litres per person per day in line with regulation 36(2)(b) of the Building Regulations 2010 (as amended). D. New non-residential development that is major development shall achieve full credits for category Wat 01 of BREEAM, unless demonstrated impracticable.”

- 9.14.2 In conclusion, a **neutral effect** is predicted.

9.15 Appraisal conclusion

- 9.15.1 The appraisal predicts: significant positive effects under two headings (economy / employment and homes); moderate or uncertain positive effects under three headings (accessibility, communities/health/wellbeing and transport) and moderate or uncertain negative effects under one headings (resources). Neutral effects are predicted under the remaining headings (which is not to suggest that there are not certain tensions with sustainability objectives to explore further). There is strong support for changes made since the Draft Plan stage, albeit also some aspects of the changes can be questioned in some respects (i.e. under specific sustainability topic headings).
- 9.15.2 There will be the potential to make adjustments to the plan through the examination in public in order to improve the performance of the plan, albeit the remit/role of the Planning Inspector(s) will be limited. The appraisal highlights a number of specific matters that might be given further consideration; however, it is difficult to make specific recommendations, because any recommendation made with a view to improving the performance of the plan under one sustainability topic heading could have knock-on implications for performance under another heading. For example, it would be easy to recommend more stringent requirements in respect of affordable housing within the urban area, but there would be implications for wider objectives with cost implications and/or the deliverability of the sites would be called into question.
- 9.15.3 Focusing on DM policy, moving forward it will be important to consider policy requirements in the round where they are associated with a cost for developers, with a view to striking the right balance between policy priorities (e.g. affordable housing versus infrastructure versus wider policy asks) in the context of development viability. It is important to be clear what is being prioritised and what compromises are being made / trade-offs accepted with a view to a ‘whole plan’ with good viability credentials and, in turn, minimal delivery risk (albeit delivery risk is reduced by a healthy supply buffer).
- 9.15.4 Finally, as part of SA there is a requirement to consider ‘**cumulative effects**’, i.e. the effects of a local plan in combination with other local plans and other strategies. This has already been a focus of considerable discussion above, particularly the matter of close collaboration Coventry and the Warwickshire authorities in respect of providing for employment land needs. Overall the proposed strategy is judged to perform very well, but the new reduced plan period is also acknowledged. Moving forward it is important to recall the context of Local Government Review (LGR) and devolution, under which there will be excellent potential to provide for development needs across the sub-region.

Part 3: Next steps

10. Plan finalisation

- 10.1.1 Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the aim is to submit the plan for examination in public alongside a summary of the issues raised through the Regulation 19 publication period.
- 10.1.2 Once found to be sound following examination the Local Plan will be adopted, at which time an SA 'Statement' will present prescribed information including "measures decided concerning monitoring".

11. Monitoring

- 11.1.1 In light of the appraisal presented above it is recommended that monitoring efforts over the course of plan implementation might include a focus on:
- Employment land – as a nationally significant growth location it will be important to monitor employment land delivery closely, including in respect of the specific types of employment units coming forward within strategic employment sites.
 - Schools capacity – this is a key issue locally, and effective monitoring of capacity issues and opportunities will assist with future plan-making.
 - Delivery on policy requirements – given viability challenges there should be a focus on monitoring the extent to which policy requirements are being delivered in full, including in respect of transport infrastructure, affordable housing and net zero development, plus there should be close monitoring of sites where delivery has been delayed. This will be key information to inform future local plan-making.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements for the SA Report.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulations

Questions answered		As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues and objectives that should be a focus?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?	- The likely significant effects associated with the draft plan - The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?	A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>		
<i>The report must include...</i>	<i>The report must include...</i>		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	i.e. answer - <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3.
c) The environmental characteristics of areas likely to be significantly affected;	The SA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan – is then discussed within the appraisal sections as appropriate, i.e. in light of the options and proposals that are a focus of the appraisal.
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the 'SA framework', which is presented within Section 3. Also, information on the SA scope is presented as part of appraisal work in Sections 6 and 9. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations but perhaps more importantly flags 'tensions' that can be a focus of further work ahead of plan finalisation.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives / scenarios appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is presented at the start of the report.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan...	This SA Report is published alongside the Proposed Submission Local Plan in order to inform representations and then subsequent plan-making stages. Specifically, the next stage is expected to be examination in public.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising the plan as part of the examination in public. It should also be noted that an Interim SA Report was published alongside the Draft Local Plan earlier in 2025 and that report, and responses received through the consultation, fed into subsequent work.

Non-technical summary of the SA Report published alongside the Proposed Submission Rugby Borough Local Plan

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Rugby Borough Local Plan being prepared by Rugby Borough Council. Once adopted, the plan will set a strategy for growth and change up to 2042, allocate sites to deliver the strategy, and establish policies against which planning applications will be determined.

SA is a process for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. The formally required SA Report is currently published alongside the “proposed submission” version of the Local Plan under ‘Regulation 19’, with a view to informing representations and subsequent plan finalisation.

The SA Report is presented in three parts:

- Part 1 – explains work that has been undertaken to explore **reasonable alternatives (RAs)** in the form of alternative approaches to growth, or ‘growth scenarios’. Specifically, work is explained to define RAs (Section 5), appraise RAs (Section 6) and then feed-back to RBC officers (Section 7).
- Part 2 – presents an appraisal of **the Local Plan** (under the ‘SA framework’).
- Part 3 – explains **next steps**, namely submission of the Local Plan for an Examination in Public.

Part 1 comprises the bulk of the SA Report and, in particular, the report explains an in-depth process to define RA growth scenarios (Section 5).

A starting point is an understanding of the emerging preferred approach, which is an evolution of that previously published for consultation in 2025, and then the task is to define a series of alternative (i.e. non-preferred) approaches. Section 5 works through a process (introduced in Section 5.1) involving considering strategic factors (Section 5.2), site options (Section 5.3) and settlement-specific considerations / scenarios (Section 5.4) before ultimately reaching a conclusion on RA growth scenarios (Section 5.5). Ultimately two sets of RA growth scenarios are defined:

- Housing – eight RA growth scenarios are defined comprising the proposed submission approach (Scenario 1) alongside four alternatives involving a similar quantum of growth and then three higher growth scenarios. Several ‘omission sites’ involving urban extensions to Rugby feature across Scenarios 2 to 8 plus one new settlement option (Lodge Farm), although it is important to be clear that the new settlement option features only in the highest growth scenario (Scenario 8). Expansion south of Long Lawford (650 homes) is the only proposed allocation that is a ‘variable’ across the growth scenarios, i.e. such that all of other proposed allocations are ‘constants’.
- Employment – four RA growth scenarios are defined comprising the proposed submission approach (Scenario 1) alongside three alternatives, which involve substituting one of the proposed allocations (Walsgrave Hill) for one or more omission sites. Again, it is the case that proposed allocations other than Walsgrave Hill are held constant.

Section 6 of the SA report then presents an appraisal of the two sets of RA growth scenarios under the ‘SA framework’ which is essentially a series of sustainability topics / objectives (see Section 3). In respect of both sets of scenarios the appraisal finds that the proposed submission approach performs well or reasonably well but that there is a case to be made for certain of the higher growth scenarios in respect of certain sustainability topics / objectives.

With regards to Section 7, which presents RBC officers' response to the appraisals:

- Housing – The appraisal shows the proposed submission approach (Scenario 1) to perform suitably well overall, albeit alternatives are shown to have merit in certain respects.

In terms of growth quantum, the proposed approach provides for local housing need (LHN) in full to 2042, and there are limited strong arguments to be made for higher growth. In particular, the appraisal shows there to be clear drawbacks to scenarios involving higher growth via support for a new large scale strategic site. In this respect the appraisal draws on and adds to the evidence provided in the Strategic Transport Assessment and Viability Study.

Officers would highlight the ongoing delivery of the strategic sites at South West Rugby and Houlton and Rugby's historically high rates of recent growth, together with high-level of public concern about infrastructure keeping pace with growth, as further strong arguments against high growth scenarios.

The weak performance of the high growth scenarios also weakens the case for extending the plan period and supports the council's view that decisions about longer-term strategy for the mid 2040s and beyond are better taken by the successor unitary authority in the context of a strategic development strategy, the new plan-making system and new national policy.

The appraisal finds there to be limited case to be made for scenarios involving non-allocation at Long Lawford, which is helpful in terms of demonstrating that there are exceptional circumstances for Green Belt release here. The appraisal highlights that there is a case to be made for additional growth outside of the Green Belt to the south of Rugby, potentially with a view to not releasing Green Belt at Long Lawford, but there are also clear constraints to growth in this area, given the Rainsbrook Valley and proximity to the committed strategic urban extension at South West Rugby. This echoes public concerns about these options highlighted through the Regulation 18 consultation and ties in with new landscape evidence gathered since that consultation.

- Employment land – Whilst the appraisal finds all of the scenarios to have pros and cons, the proposed submission approach (Scenario 1) is shown to perform most strongly in transport terms and is also shown to be one of the two best performing scenarios in terms of delivering on economy / employment land objectives. These are two key factors such that, overall, it is possible to conclude that Scenario 1 best represents sustainable development.

This supports the council's exceptional circumstances case. Overall, it is considered that Scenario 1 provides the greatest level of opportunities both in economic terms and for wider community benefits while raising fewer transport concerns than the alternative scenarios. In particular, the submission approach has potential to deliver sustainable transport to a large workforce that is superior to other scenarios.

A further consideration is the possible higher growth scenario involving Scenario 1 plus additional employment land allocated in the Thurlaston area (a scenario that is not formally appraised but is discussed above at para 6.3.4). However, this approach is not supported given the weak strategic case plus local sensitivities around: maintaining a settlement gap to Thurlaston and Dunchurch; the need to deliver and mitigate the impacts of South West Rugby; and the constraints on this part of the highway network.

Moving onto **Part 2** of the SA Report, this essentially builds upon the appraisal of Scenario 1 in Section 6.2 (Housing growth scenarios appraisal) and Scenario 1 in Section 6.3 (Employment growth scenarios appraisal). Specifically, added consideration is given to: A) site allocations that are a 'constant' across the growth scenarios; and B) thematic and site specific policies.

The appraisal concludes as follows:

The appraisal predicts: **significant positive effects** under two headings (economy / employment and homes); moderate or uncertain **positive effects** under three headings (accessibility, communities/health/wellbeing and transport) and moderate or uncertain **negative effects** under one headings (resources). Neutral effects are predicted under the remaining headings (which is not to suggest that there are not certain tensions with sustainability objectives to explore further). There is strong support for changes made since the Draft Plan stage, albeit also some aspects of the changes can be questioned in some respects (i.e. under specific sustainability topic headings).

There will be the potential to make adjustments to the plan through the examination in public in order to improve the performance of the plan, albeit the remit/role of the Planning Inspector(s) will be limited. The appraisal highlights a number of specific matters that might be given further consideration; however, it is difficult to make specific **recommendations**, because any recommendation made with a view to improving the performance of the plan under one sustainability topic heading could have knock-on implications for performance under another heading. For example, it would be easy to recommend more stringent requirements in respect of affordable housing within the urban area, but there would be implications for wider objectives with cost implications and/or the deliverability of the sites would be called into question.

Focusing on Development Management policy, moving forward it will be important to consider policy requirements in the round where they are associated with a cost for developers, with a view to striking the right balance between policy priorities (e.g. affordable housing vs infrastructure vs wider policy asks) in the context of development **viability**. It is important to be clear what is being prioritised and what compromises are being made / trade-offs accepted with a view to a 'whole plan' with good viability credentials and, in turn, minimal delivery risk (albeit delivery risk is reduced by a healthy supply buffer).

Finally, as part of SA there is a requirement to consider '**cumulative effects**', i.e. the effects of the plan in combination with other plans / strategies, with a key matter being collaboration with Coventry and the Warwickshire authorities in respect of providing for employment land needs. Overall the proposed strategy is judged to perform very well, but the new reduced plan period is acknowledged. Moving forward it is important to recall the context of Local Government Review (LGR) and devolution, under which there will be potential to provide for sub-regional development needs.

Finally, with regards to the discussion of next steps in **Part 3** of the report, it is essentially the case that:

Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the aim is to submit the plan for examination in public alongside a summary of the issues raised through the Regulation 19 publication period. Following examination, and assuming the plan is found to be sound, it will then be adopted, at which time an SA 'Statement' will present prescribed information including "measures decided concerning monitoring".

Part 3 then ends with a discussion of matters that might be a focus of monitoring following plan adoption, in light of the appraisal presented in Part 2. The suggestion is a focus on:

- Employment land – as a nationally significant growth location it will be important to monitor employment land delivery closely, including in respect of the specific types of employment units coming forward within strategic employment sites.
- Schools capacity – this is a key issue locally, and effective monitoring of capacity issues and opportunities will assist with future plan-making.
- Delivery on policy requirements – given viability challenges there should be a focus on monitoring the extent to which policy requirements are being delivered in full, including in respect of transport infrastructure, affordable housing and net zero development.

Appendix 4 – Habitats Regulation Appropriate Assessment

The Habitats Regulation Appropriate Assessment can be accessed on the following link:

<https://www.rugby.gov.uk/documents/20124/62314909/Habitat+Regulations+Assessment+%28HRA%29+Appropriate+Assessment.pdf/0ff00767-bc10-07cf-0737-51737b0f2114?t=1765547205761>

Appendix 5 – Regulation 22 Consultation Statement

The Regulation 22 Consultation Statement can be accessed on the following link:

<https://www.rugby.gov.uk/documents/20124/62314932/Local+Plan+Consultation+Statement.pdf/25295bf2-130f-3cff-dba0-9352f63389c2?t=1766133921381>

an executive summary of the Regulation 22 Consultation Statement can be accessed on the following link:

<https://www.rugby.gov.uk/documents/20124/62314932/Consultation+Statement+Executive+Summary.pdf/f7f2ea58-4ac0-a86b-5c60-ee2b38ee2938?t=1768564002650>



CONSULTATION STATEMENT

ADDENDUM

APRIL 2026

CONTENTS

1. Introduction	5
2. The Regulation 19 consultation	5
3. Number of responses to the consultation	6
4. Main issues raised in representations	7
Objectives and priorities	7
Policy S1 Settlement Hierarchy	9
Policy S2 Strategy for homes	14
Policy S3 Strategy for employment land	24
Policy S4 Sites for Gypsies and Travellers	33
Policy S5 Countryside protection	35
Policy S6 Residential Allocations	40
Site 54 Oakdale Nursery, Brandon.....	49
Site 337 West farm and home farm, Brinklow	50
Site 315 Land South of Rugby Road, Brinklow	53
Site 129 Land North of Lilbourne Road, Clifton upon Dunsmore	58
Site 202 Newton Road, Clifton upon Dunsmore	61
Site 307 North Road, Clifton upon Dunsmore	63
Site 172 Elizabeth Way, Long Lawford	65
Site 316 Land at Long Lawford	66
Site 253 Lawford Fields Farm, Long Lawford.....	71
Site 87 Hillcrest Farm, Newton.....	76
Site 353 Town Hall, Rugby.....	77
Site 283 Rugby Central Shopping Centre, Rugby	78
Site 350 Rounds Gardens, Rugby	79
Site 351 North of Rounds Gardens, Rugby	80
Site 354 92 Lower Hillmorton Road, Rugby	80
Site 279 Stagecoach car park, Rugby.....	81
Site 153 Westway Car Park, Rugby	81
Site 338 Land South of Crick Road, Houlton	81
Site 59 Newton Manor Lane, Brownsover	83
Site 100 Land at High Street, Ryton-on-Dunsmore	89
Site 6 Land east of Fosse Way opposite Knob Hill, Stretton-on-Dunsmore	90
Site 81 Land West of Fosse Way, Stretton-on-Dunsmore	92
Site 348 The Croft, Stretton-on-Dunsmore	95

Site 39 Dyers Lane, Wolston	99
Site 136 North of Warwick Road, Wolston	101
Site 358 Land at Coventry Road, Wolvey.....	106
Site 309 Land North of B4109, Wolvey.....	110
Residential site allocations in response to which no main issues or recommended modifications were raised.....	117
Policy S7 Employment allocations	117
Site 64 Coton Park East	124
Site 17 South West Rugby Employment Phase 2	132
Site 14 North of Ansty Park.....	139
Site 95 Crowner Fields Farm and Home Farm, Ansty	142
Site 121 Land at Walsgrave Hill	144
Policy S8 South West Rugby.....	151
Policy S9 South West Rugby spine road network.....	154
Policy CL1 Net Zero Buildings	156
Policy CL2 Renewable Energy and low carbon technology	160
Policy CL3 Water supply, quality and efficiency	164
Policy CL4 Climate adaptation.....	167
Policy E1 Employment land protection	168
Policy E2 Employment development	169
Policy E3 Rural economy	171
Policy C1 Rugby town centre.....	172
Policy C2 Main town centre uses.....	172
Policy C3 Local and district centres	173
Policy C4 Neighbourhood hubs	173
Policy EN1 Biodiversity and Geodiversity Protection	174
Policy EN2 Landscape Protection	177
Policy EN3 Rainsbrook Valley Landscape of Elevated Sensitivity	180
Policy EN4 Areas of Separation	184
Policy EN5 Biodiversity net gain	190
Policy EN6 Canopy cover	193
Policy EN7 Flood risk	196
Policy EN8 Environmental protection and amenity.....	198
Policy EN9 Air quality	198
Policy H1 Housing Mix	198
Policy H2 Affordable Housing.....	200
Policy H3 Rural Worker dwellings.....	206

Policy H4 Rural Exception Sites	206
Policy H5 Replacement Dwellings	206
Policy H6 Specialist Housing	206
Policy H7 Housing Standards	208
Policy H8 Houses in Multiple Occupation	210
Policy W1 Wellbeing	210
Policy W2 Open space and sports provision	214
Policy D1 Well-designed Places	218
Policy D2 Infill and Householder Development	219
Policy D3 Landscaping	219
Policy D4 Historic Environment	221
Policy D5 Sustainable Drainage	222
Policy I1 Transport	223
Policy I2 Parking	226
Policy I3 Communications Infrastructure	229
Policy I4 Infrastructure and Planning Obligations	229
Policy I5 New Railway Stations	231
Other issues: duty to cooperate	233
Other issues: legal compliance/ sustainability appraisal/ Consultation/ Evidence	237
Other issues: Policies map	246
Appendix 1: Statement of representations procedure	250

1. INTRODUCTION

- 1.1. This document is an addendum to the consultation statement dated December 2025 which details prior stages of consultation on the emerging local plan.
- 1.2. This consultation statement addendum provides details of the number of representations made pursuant to Regulation 20 of The Town and Country Planning (Local Planning) (England) Regulations and summarises the main issues raised in those representations. This addendum also provides the Council's brief responses to those main issues.

2. THE REGULATION 19 CONSULTATION

- 2.1. The consultation on the Proposed Submission Local Plan 2025-2042 for Rugby Borough ran for six weeks from Friday 30 January 2026 to Friday 13 March 2026.
- 2.2. Copies of the Proposed Submission Local Plan, policies map, Sustainability appraisal report, Consultation statement and all other supporting documents were made available on the council's website and in hard copy at the following locations:

Rugby Borough Council's offices, Town Hall, Evreux Way, Rugby, CV21 2RR
Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ
Dunchurch Community Library, The Green, Dunchurch, Rugby, CV22 6PA
Wolston Library & Information Centre, Manor Estate, Wolston, CV8 3GX
- 2.3. The consultation was publicised through the council's social media accounts, through a notice published in the Rugby Observer newspaper on Friday 30 January. The promotional material for the consultation included a YouTube video which is 2:35 minutes in length and details the changes from the spring 2025 preferred options consultation document and outlines how interested persons can respond to the consultation. That video has had 847 views.
- 2.4. Emails were sent to 3,465 email addresses on the council's planning policy consultation database, which included all those who had responded to the Regulation 18 preferred options consultation in spring 2025. Hard copy letters were sent to a further 28 postal addresses.
- 2.5. In persons residents' information events were held at the following times and places during the consultation period:

Event	Date/time	Location	No. of attendees
Parish Councils information evening	Wednesday 4 February 2026 7pm	Rokeby Room, The Benn Hall, Newbold Rd, Rugby, CV21 2LN	32
Coton Park East and Newton	Thursday 5 February 2026 6pm	Rugby Free Primary School, 1 Bailey Rd, Rugby, CV23 0PD	28
Brinklow (2 sessions)	Friday 6 February 2026 7pm and 8:15pm	Brinklow Community Hall, Broad Street, Brinklow, CV23 0LS	66
Wolvey and Barnacle	Tuesday 10 February 2026 6pm	Wolvey Village Hall, The Square, Wolvey, LE10 3LJ	72
Clifton and Houlton (2	Thursday 12 February	Townsend Memorial Hall, 1	45

Event	Date/time	Location	No. of attendees
sessions)	2026 6pm and 7:15pm	Lilbourne Rd, Clifton upon Dunsmore, CV23 0BD	
Long Lawford	Tuesday 24 February 2026 6pm	Lawford Lighthouse, School St, Long Lawford, CV23 9AT	35
Wolston and Stretton	Wednesday 25 February 2026 6pm	Wolston Leisure and Community Centre, Old School Fields, Manor View, Manor Estate, Wolston, CV8 3PD	57
Rugby	Wednesday 4 March 2026 6pm	Rokeby Room, The Benn Hall, Newbold Rd, Rugby, CV21 2LN	36
Total			371

2.6. The residents' information events comprised a presentation by the Development Strategy Manager (planning policy manager) and Chief Planning Officer and then a Q&A session chaired by the cabinet member for planning or the leader of the council (this varied for different events).

2.7. Respondents were able to respond to the consultation by three different means:

- Hard copy by post or handed in. Hard copy forms were deposited in libraries and were made available at the information events listed above.
- By email.
- By completing a webform on the council's website

2.8. Respondents to the consultation were encouraged to use the Planning Inspectorate model response form, which we adapted for the Rugby Borough Proposed Submission Local Plan.

2.9. The statement of representations procedure is included as **Appendix 1**.

3. NUMBER OF RESPONSES TO THE CONSULTATION

3.1. 680 respondents submitted representations. Of these 46 were group representations submitted on behalf of a named list of respondents with names and addresses supplied. Therefore, representations in response to the consultation were submitted by or on behalf of 6,025 individuals and other entities.

3.2. Of the representations, 443 were received by email, 136 were received by webform, and 101 were received by post or were hand-delivered. *Note that some respondents submitted via multiple methods and have not been double counted in these totals.*

3.3. Core Document 9 provides a full alphabetical list of the representations received. Core Document 10 provides a list of the representations received by policy.

- 3.4. Of the representations received, 553 were made by residents or other individuals, 19 were made by parish councils, eight were made by statutory consultees, three were made by neighbouring authorities, 30 were made by other organisations, and 67 were made by landowners or site promoters.

4. MAIN ISSUES RAISED IN REPRESENTATIONS

- 4.1. The following sections summarise the main issues raised in representations made under Regulation 20 in response to each policy of the Proposed Submission Local Plan. The requirement of Regulation 22 is for the council to provide a **summary** of the **main issues**. Therefore this statement does not include every issue raised in every representation. Similarly, the issues are summarised rather than repeated verbatim from the representations in which they are raised.
- 4.2. In some instances a representor did not identify which policy their issue related to. In such instances the issue was attributed to the policy to which it is most relevant.
- 4.3. In line with Planning Inspectorate guidance, a brief council response to each main issue is provided.

OBJECTIVES AND PRIORITIES

- 4.4. 12 representations on behalf of 12 people or organisations argued that the plan's objectives and priorities section is unsound. The following main issues were raised:

Issue	Objectives have not been followed in the rest of the plan e.g. third largest allocation is at the least sustainable settlement Wolvey contrary to objective 1, scale of allocations in rural areas requiring car travel contrary to objective 3, lack of new infrastructure being proposed is contrary to objective 5, loss of Green Belt and greenfield land contrary to objective 6
Who raised the issue	Warwick, Adrian; Wolvey Parish Council; Eaton, David
No. raising the issue	3
Council response	This is principally an objection to Policy S6 and specifically the residential site allocations in Wolvey and as such is dealt with in issues raised under that policy. The Council considers that there is no conflict between the proposed allocation of 210 new homes in Wolvey and objectives 1, 3 and 6.

Issue	Omission of a positive vision for the plan or direct reference to delivery of new homes (including affordable homes), as required by NPPF
Who raised the issue	Catesby Strategic Land; Catesby Estates; Vistry Group; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Richborough (Clifton upon Dunsmore); Warwickshire Property and Development Group (site 90)
No.	7

raising the issue	
Council response	There is no inconsistency with national policy. Paragraph 15 NPPF sets that “plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings”. This paragraph is clearly referring to the plan as a whole, not a separate “vision statement” within the plan. Therefore, no additional vision needs adding. The objectives are for the council to determine subject to consistency with national policy. The objectives also draw more widely on the council’s Corporate Strategy 2025-2035, Economic Strategy 2025-2035 and Climate Change Strategy. It is not necessary of desirable to adopt objectives that simply repeat national policy requirements. This would conflict with NPPF para 16f) and would result in every local plan in the county having the same objectives. If government intended all plans to have uniform objectives which reiterate national policy, it would have said so.

Issue	The third strategic priority on page 7 is inconsistent with national policy because it is ambiguous as to what it means
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	This is a reference to the strategic priorities on page 7. The strategic priority objected to is “Overall pattern and scale of development and conservation”. As explained in the text on local plan page 7, NPPF paras 20-21 define that strategic policies are those which address strategic priorities. NPPF para 20 states that strategic priorities should set out (amongst other things) “an overall strategy for the pattern, scale and design quality of places” and “conservation and enhancement of the natural, built and historic environment”. The table on page 7 merely identifies which of the policies in the plan address these NPPF strategic priorities and are therefore “strategic”. Accordingly there is no ambiguity, the table merely tells us which strategic policies address the overall pattern and scale of place and which address conservation of the natural/built/historic environment.

Issue	Section 1 does not reference population growth, current employment rates and predicted employment rates over the plan period.
Who raised the issue	SEGRO
No. raising the issue	1

Council response	The respondent seeks inclusion of these details in this section to show how employment site allocations will support proposed job growth in the borough and how the employment sector can create more skilled jobs. The plan doesn't set a job creation target. This is because the requirement for employment land is in significant part regionally derived rather than being based on econometric projections for jobs growth in the borough. The context for employment growth is a functional economic market area and housing market area that covers Coventry and Warwickshire, not just Rugby Borough. The balance of jobs to homes in that wider area is set out in the Homes-Jobs Alignment paper (SD7). For these reasons it isn't considered possible or necessary to provide materials which tie the plan's employment allocations to a job creation target for Rugby Borough.

- 4.5. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Make explicit reference to objective of meeting housing and commercial needs of the borough and increasing housing supply as part of an objectives and vision statement	Catesby Strategic Land; Catesby Estates; Vistry Group; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Richborough (Clifton upon Dunsmore); Warwickshire Property and Development Group (site 90)
Third strategic priority on page 7 should be rewritten to make clear what the priority is.	Richborough (Clifton upon Dunsmore); Warwickshire Property and Development Group (site 90)
Add details to Section 1 of Rugby's population growth, current employment rates and predicted employment rates over the plan period	SEGRO
Table on p7 should list S3 not S2 under provision of employment land	Panattoni and AC Lloyd
Council response to modification proposals: The Council considers that the current objectives and strategic priorities are compliant with national policy and are sufficient to set out the aims and vision of the Local Plan. The typographical error in the table on p7 is noted and will be an additional modification.	

POLICY S1 SETTLEMENT HIERARCHY

- 4.6. 157 representations on behalf of 907 people or organisations argued that policy S1 is unsound. Seven representations on behalf of seven people or organisations argued that it is sound. The main issues for this policy are listed below.

Issue	Proposal for significant planned development at main rural settlements (1.17) is contrary

	to national policy and is not justified by supporting evidence
Who raised the issue	Currington, Ian; James , Charles; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Court, Gerry & Carol; Spencer, June; Ling, Philip; Griffin, Colin; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Penman, Judith; Hilliard, Robert; Higginson, Helen; Gronow, Yvonne; Yates, Alan; Hawkins, John; Crosby, Ralph; Crosby, Sheila; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Black, John; Hawkins, Rachel; Bassett, Graham; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Gillman, Sarah Elizabeth; Lumsden, Peter; Parsons, Chris ; Persimmon Homes (Central); Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Long Lawford Residents ; Catesby Strategic Land; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; Gillman, Keith Neville; Reeve, Michael David; Lumsden, Jennifer; Wolston Parish Council
No. raising the issue	817 (including group responses)
Council response	This is principally an objection to Policy S6 residential allocations and specifically the scale of residential allocations in villages, rather than to the settlement hierarchy itself. As such this issue is principally addressed under Policy S6. Notwithstanding that, the scale of housing allocations in main rural settlements, as explained in page 9 of the local plan, is not considered to be disproportionate to the position of these settlements as the second tier in the settlement hierarchy behind Rugby. 1,653 new homes are allocated on sites in the borough's rural settlements. However, the balance of housing planned in the period to 2042 is heavily weighted towards the town of Rugby. Excluding small site (<5 dwelling) windfalls, the location of which are unknown, 82% of the remaining 10,879 homes planned 2025-2042 would be at the town of Rugby versus 18% in the borough's rural settlements. In 2021 26% of the borough's population lived in rural areas versus 74% in the town of Rugby. The Green Belt Exceptional Circumstances Topic Paper (GBD4) and Sustainability Appraisal report (CD5) provide explanation of the consideration that has been given to further development options at the town of Rugby. Some objections state that the scale of development in main rural settlements conflicts with the statement in policy S1ii. that development at "main rural settlements should be in proportion to the settlement and would likely be small scale". However, this statement is clearly referring to "further non-plan-led development" it does not apply to the allocations proposed under the plan.
Issue	Insufficient consideration has been given to urban extension or non-greenbelt development nearer urban areas or other alternatives to growth in rural villages
Who raised	Currington, Ian; James, Charles; James, Catharine; Wolvey Parish Council; Ling, Philip; Mooney, Diane; Jackson, Geoff; Kimberley, Peter; Kimberley, Diane; White, Claire; White,

the issue	Garrie; Pitt, Michelle; Persimmon Homes (Central); Mistry, Bipin; Wolston Parish Council, CPRE
No. raising the issue	243 (including group responses)
Council response	As with the previous issue, this is principally an objection to Policy S6 rather than to the settlement hierarchy itself. The Green Belt Exceptional Circumstances Topic Paper (GBD4) and Sustainability Appraisal report (CD5) provide explanation of the consideration that has been given to further development options at the town of Rugby. More detail on the consideration of specific site options is set out in the Stage 2 Site Assessment Report (SS8).

Issue	Inclusion of Wolvey as a Main Rural Settlement is unsound - it is the smallest & least well served of the villages
Who raised the issue	James , Charles; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Court, Gerry & Carol; Spencer, June; Ling, Philip; Griffin, Colin; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crosby, Ralph; Crosby, Sheila; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Baker, Michael; Baker, Irene; Russell, Pauline; Hawkins, Rachel; Bassett, Graham; White, Claire; White, Garrie; Pitt, Michelle; Billington, Glynis; Chrimes, Brian; Trevelyan, Michael; Haughain, Mark; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Bates, David; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Gillman, Sarah Elizabeth; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Coope, Joanne; Miller, Stuart; Collins, Sarah; Collins, Michael; Billington, Richard; Gillman, Keith Neville; Reeve, Michael David; Reeve, Kathleen; Fisher, Hilary; Fisher, Michael; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Kelly, Patrick and Linda; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Hilliard, Sharon; Bates, Malcolm; Lovett, Lorna; King, Andrew; King, Alison; Briggs, Georgina; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Woolford, Wayne; Lee, Joanne; Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Alan; McCormack, Gemma; Myers, Alex; Price, Heather; Shaw, Wendy; Jones, Alan
No. raising the issue	130 (including group responses)
Council response	Wolvey was identified as a main rural settlement in the Rugby Borough Local Plan 2011-2031 (adopted June 2019) and before it in the Core Strategy (June 2011) and Rugby Borough Local Plan (July 2006). It is considered to remain appropriate for Wolvey to be identified in this settlement tier. More information is provided in the Rural Sustainability Study Report (SD14).

Issue	Inclusion of Brinklow as a Main Rural Settlement is unsound
Who raised the issue	Ashcroft, Sarah; Johnson, Linda and Gary
No. raising the issue	3
Council response	As with Wolvey, Brinklow was identified as a main rural settlement in the Rugby Borough Local Plan 2011-2031 (adopted June 2019) and before it in the Core Strategy (June 2011) and Rugby Borough Local Plan (July 2006). It is considered to remain appropriate for Brinklow to be identified in this settlement tier. More information is provided in the Rural Sustainability Study Report (SD14).

Issue	Inclusion of Wolston as a Main Rural Settlement is unsound
Who raised the issue	Wolston Parish Council
No. raising the issue	229
Council response	As with Wolvey and Brinklow, Wolston was identified as a main rural settlement in the Rugby Borough Local Plan 2011-2031 (adopted June 2019) and before it in the Core Strategy (June 2011) and Rugby Borough Local Plan (July 2006). It is considered to remain appropriate for Wolston to be identified in this settlement tier. More information is provided in the Rural Sustainability Study Report (SD14).

Issue	The restriction of non-plan led development at main rural settlements to being “small scale” is not justified. The plan should flexibly allow larger unplanned development at main rural settlements.
Who raised the issue	Archdiocese of Birmingham; Richborough (Clifton upon Dunsmore)
No. raising the issue	2
Council response	Providing “flexibility” for major unplanned development in the borough’s rural areas would be contrary to NPPF para 15 which states that the planning system should be genuinely plan-led. It would also undermine/remove the ability of communities to meaningfully shape the future development in their areas through the democratic processes of local plan and neighbourhood plan making.

Issue	S1 is unsound because it prevents modern technology and infrastructure such as data centres, which are essential to the modern economy, from being built outside of settlements.
Who	Everwell Development and Mactaggart Family & Partners

raised the issue	
No. raising the issue	1
Council response	This comment is more appropriately dealt with as an objection to policy S5 (countryside protection) and E2 (Employment Development) the issue of employment development in the countryside is dealt with under those policies. Data centres are for these purposes considered to be an employment use.

Issue	The statement regarding Crowner Fields Farm made in para 1.18 does not justify why that allocation is at odds with the settlement hierarchy.
Who raised the issue	Ansty Parish Council
No. raising the issue	1
Council response	The statement in the supporting text that employment allocations on the edge of Coventry, which is a large urban area but being in a different local authority district does not form part of the borough's settlement hierarchy, fall outside of the settlement hierarchy is not considered to conflict with the settlement hierarchy.

Issue	The plan fails to justify how higher house prices lead to more affordable housing And The plan offers no justification in response to the serious objection to the strategy documented in WCCs response to the previous consultation
Who raised the issue	Yates, Alan
No. raising the issue	1
Council response	Although not really comments on Policy S1, these comments are addressed here. This first comment is understood to be a reference to the position put forward in the Green Belt Exceptional Circumstances Topic Paper (GBD4) that the proposed Green Belt allocations would lead to higher affordable housing delivery. The basic principle is that higher house prices mean more development value and this in turn means more potential for developer contributions, including affordable housing. This is shown in the viability assessment (document I1). The second comment refers to the issues raised by Warwickshire County Council (WCC) in its response at Regulation 18 stage. An updated response has been submitted by WCC at Regulation 19 stage (see document CD10) and a statement of common ground

	prepared (SOCG7).

- 4.7. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Settlement boundaries must be amended to include allocations, or the wording of S1A(ii) must be amended to clarify that plan-led development is	Inside Land Group
The policy should include a specific exception for essential modern technology, digital and data-processing infrastructure.	Everwell Development and Mactaggart Family & Partners
S1(ii) should be removed and all rural settlements listed in S1(ii) added to S1 (iii)	CPRE
Amend wording to ii to require further development to be in proportion to local infrastructure and change 'would likely be small scale' to 'should be small scale'	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
The second sentence of A. ii. should be amended to remove 'and would likely be small scale'.	Richborough (Clifton upon Dunsmore)
Paragraph 1.17 should be amended to prioritise gradual small-scale and infill developments rather than larger scale developments	Parsons, Chris
Council response to modification proposals: The council does not consider that these modifications are necessary to address issues of soundness. It is clear from the wording of Policy S1a.ii. that further non-plan-led development refers to development not allocated through the local plan or a neighbourhood plan.	

POLICY S2 STRATEGY FOR HOMES

- 4.8. 115 representations on behalf of 1,163 people or organisations argued that policy S2 is unsound. Nine representations on behalf of nine people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Housing requirement should be increased above LHN based on: - economic growth and/or demographic trends and/or - acute affordable housing need - and/or potential unmet need from Coventry - and/or updated standard method calculation before plan is adopted - and/or a past track record of housing delivery that is higher than LHN
Who raised the issue	Ashberry Strategic Land; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Persimmon Homes (Central); Kang, Jane; Critchley, P; Miller Homes; William Davis Homes (site 315); Catesby Estates; Russell, Ridgley, Pugh and Pugh; Vistry Group; Vistry Group; Storm Consulting; Miller Homes (Brownsover Road); Rosconn Group; Richborough (Clifton upon Dunsmore); Rosconn Group; Mackenzie Miller Homes; Warwickshire Property and Development Group (site 90)

	Note not every respondent listed above raised every one of the arguments for a higher housing requirement listed under this issue
No. raising the issue	28
Council response	Section 2 of the Development Needs Topic Paper (SD11) considered most of these issues. The argument made by some respondents that the housing requirement should be increased because the trends-based 2022-based household projections indicate higher growth is effectively a variant on the argument that high past rates of delivery should be projected forward into a higher requirement. Both are arguments for past-trends-based projection of future housing needs. As stated in the Development Needs Topic Paper these arguments are no longer consistent with national policy. The topic paper states: “Had government intended that housing requirements should be based on past trends then it would have continued with a standard method for calculating local housing need which was based on trends-based household projections (as was the position pre 2024). Instead, the 2024 NPPF introduced a new standard method which isn’t trends based but is instead stock based. The new standard method applies a 0.8% annual increase in dwelling stock and then adjusts this upward depending upon the extent to which the ratio of median house prices to median earnings exceeds In short, it should not be assumed that areas experiencing fast growth will continue to maintain that rate of development in perpetuity. Equally it should not be assumed that lower growth areas will continue that trajectory. This is clearly not the intention of national policy and the new standard method. Therefore, historically very high rates of housebuilding in Rugby Borough do not present a convincing argument for setting a housing requirement above local housing need.”. In relation to local housing need needing to be updated, the Planning Practice Guidance (Paragraph: 008 Reference ID: 2a-008-20241212) states: “local housing need calculated using the standard method may be relied upon for plan making for a period of 2 years from the time that the plan is submitted to the Planning Inspectorate for examination”. Updated housing affordability ratios were published on 26 March 2026 showing a marginal improvement to the average median affordability ratio and a change to the standard method requirement from 636 to 635 homes per year. Updated dwelling stock estimate figures – the other data that feeds into the standard method and is updated annually – are not expected until May 2026. Therefore, local housing need will be fixed at 635 for two years from submission. It is not considered necessary to amend the requirement figure from 636 to 635.
Issue	Past delivery of affordable housing has been low, and the proposed submission local plan cannot meet full need - this justifies setting the housing target higher
Who raised	Miller Homes; Vistry Group; Storm Consulting; Rosconn Group; Richborough (Clifton upon Dunsmore); Rosconn Group

the issue																																																													
No. raising the issue	6																																																												
Council response	This is effectively a subset of the first main issue highlighted under this policy, but it is worth commenting on in a bit more detail. Identifying past affordable housing delivery rates is not straightforward because this data includes new build and acquisitions and includes s106 housing and housing funded through Homes England grant. This is not monitored directly by planning officers but is reliant on data collected by the council's housing team from registered providers and data collected separately by Homes England. The data is also subject to frequent revision as information is updated/revised. This means that government published statistics do not accord with local Authority Monitoring Report data. Using the government statistics in Table 1011 (additional affordable housing supply, detailed breakdown by local authority) historic affordable housing delivery in the borough is recorded as follows: <table><tr><td>Year</td><td>11-12</td><td>12-13</td><td>13-14</td><td>14-15</td><td>15-16</td><td>16-17</td><td>17-18</td><td>18-19</td><td>19-20</td><td>20-21</td><td>21-22</td><td>22-23</td><td>23-24</td><td>24-25</td></tr><tr><td>New build</td><td>192</td><td>85</td><td>42</td><td>161</td><td>22</td><td>23</td><td>42</td><td>287</td><td>377</td><td>121</td><td>185</td><td>165</td><td>101</td><td>192</td></tr><tr><td>Acqui-sitions</td><td></td><td>6</td><td>2</td><td>10</td><td>5</td><td>6</td><td>6</td><td>12</td><td>45</td><td>3</td><td>4</td><td>40</td><td>33</td><td>6</td></tr><tr><td>Total</td><td>192</td><td>91</td><td>44</td><td>171</td><td>27</td><td>6</td><td>23</td><td>48</td><td>299</td><td>422</td><td>124</td><td>189</td><td>205</td><td>134</td></tr></table> This shows 1,975 additional affordable homes over the period compared to 1,844 reported in authority monitoring reports. Richborough (Clifton upon Dunsmore) have combined the additions data with published government data on social housing sales and demolitions. This data shows in Rugby Borough over the same 2011-2025 period 398 demolitions, 355 right to buy/right to acquire/other sales to sitting tenants, 149 low cost home ownership sales (this is typically where shared-ownership homes staircase to full ownership) and 46 other sales. This totals 948 losses over the 14 year period. In considering this net position, it is important to recognise that affordable housing is about tenure. Local authorities do not have the ability through the planning system to control the number of homes in specific tenures. This is because a significant proportion of the net change in stock in different affordable housing tenures reflects movement in the existing housing stock – for example dwellings being sold out of affordable housing tenures into other tenures or other dwellings being acquired and brought into affordable tenures. Similarly, the planning system can't control the level of new build social housing that is grant funded by Homes England (i.e. is not s106) which depends on national government policy and individual RSL decisions. That leaves local planning authorities with a single tool – s106 affordable housing - and that tool can't control net changes in stock in affordable housing tenures.	Year	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24	24-25	New build	192	85	42	161	22	23	42	287	377	121	185	165	101	192	Acqui-sitions		6	2	10	5	6	6	12	45	3	4	40	33	6	Total	192	91	44	171	27	6	23	48	299	422	124	189	205	134
Year	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24	24-25																																															
New build	192	85	42	161	22	23	42	287	377	121	185	165	101	192																																															
Acqui-sitions		6	2	10	5	6	6	12	45	3	4	40	33	6																																															
Total	192	91	44	171	27	6	23	48	299	422	124	189	205	134																																															

This absence of control is why national policies and guidance do not require planning policies to set targets for net changes in the stock of affordable housing tenures.

Notwithstanding those limitations, it will be argued - by land promoters seeking to use social housing statistics to push up overall housing numbers to secure the allocation of omission sites – that the net affordable housing record is indicative of an acute Rugby Borough-specific problem with affordable housing delivery that calls for more housebuilding.

This argument is called into question by looking at the national and regional picture for changes in the dwelling stock in different tenures and then comparing this to Rugby Borough.

Government live table 104 shows net changes in dwelling stock by tenure in England 2011-2024. This shows a decline in the number of dwellings rented from local authorities in England of 151,814 over that period which is offset by an increase in 347,251 in the number of dwellings rented from registered providers, making a net increase of 195,437 in affordable rented tenures. Over the same period, the total dwelling stock in England is shown as growing by 2,641,347 dwellings. This means that 7% of the national increase in dwelling stock has been in affordable rented housing. The overall dwelling stock has grown by 11%, while the stock in affordable rented tenures has grown by 5%.

For the West Midlands region the picture shows more modest growth in affordable housing of 17,069 (2011-2024) a 3.8% increase, compared to 10.2% increase in all dwellings. With growth in affordable rented dwellings making up, similarly to the national picture, 7% of the net increase in dwelling stock.

Using government live table 100 we can see that for Rugby Borough 2011-2024 the total stock of affordable rented dwellings (combined local authority and registered provider) increased from 6,021 to 6,748, a 12% increase. Over the same period the total dwelling stock grew by 20.8%. 8% of the net increase in dwelling stock was in affordable rented tenures.

This shows Rugby Borough delivering 2011-2024 a net increase in dwelling stock of 21% compared to 11% for England and the 10% for the West Midlands and a net increase in affordable rented dwelling stock of 12% compared to 5% and 4% respectively. The proportion of the increase in dwelling stock that is in affordable rented tenures in Rugby was 8% compared to 7% regionally in nationally.

In other words, Rugby Borough's net affordable housing position is considerably better than the regional and national picture. That regional and national picture is principally influenced by national government decisions in terms of the affordable housing grant programme and policies like right to buy and right to acquire rather than by local authority planning decisions.

So the net stock position doesn't support Richborough or others' argument that there is an unusually bad affordable housing position in Rugby Borough. In fact, it suggests the opposite.

	However, Rugby Borough has delivered over the past 14+ years the very high increase in overall all tenures dwelling stock that Richborough and others arguing for an increase in housing requirement call for, but this hasn't delivered a similarly big increase in affordable housing tenures. In other words the past record disproves their thesis that increasing overall housing numbers is the solution to affordable housing delivery challenges. Despite housebuilding that has been in the top 5% of local authorities in England over the last 20 years, Rugby Borough has seen a <i>decline</i> in the proportion of its dwelling stock that is in affordable tenures from 14% to 13%.

Issue	The windfall figure is too low compared to historic figures
Who raised the issue	Hillmorton Voice Residents Association; CPRE; Allanach, Richard
No. raising the issue	300 (including group responses)
Council response	The windfall figure is justified in the Windfall Allowance Report (document SD13) and is discussed in the Development Needs Topic Paper (SD11). Windfalls are currently only claimed based on past delivery for sites of fewer than 5 units. A higher windfall allowance would need to expand to larger sites. Doing this would create a risk of double counting given that the plan makes allocations in the urban area. Additional analysis could consider if the windfall allowance could be expanded to units of 5-9 dwellings to reduce this double counting risk. This could add a modest number of homes. However, the council doesn't at this stage consider this to be necessary.

Issue	The windfall figure is too high and/or double counts with other sources of supply
Who raised the issue	Tarrant, John; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Kang, Jane; Critchley, P; Russell, Ridgley, Pugh and Pugh; Richborough (Clifton upon Dunsmore); Mackenzie Miller Homes
No. raising the issue	11
Council response	The windfall figure is justified in the Windfall Allowance Report (document SD13) and is discussed in the Development Needs Topic Paper (SD11). There is no double counting as windfall is only claimed for sites of fewer than 5 dwellings and these are not included in the supply. The windfall allowance has been accepted in a recent s78 appeal: APP/E3715/W/25/3373251 Land North of Rounds Gardens, Rugby, CV21 2BS although it was not specifically contested or commented upon in that decision.

Issue	The whole plan buffer is too low given SUE delivery risks and market absorption constraints, or to provide a resilient 5yHls throughout the plan period
Who raised the issue	Ashberry Strategic Land; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Davidsons Homes; Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Kang, Jane; Critchley, P; William Davis Homes (site 315); Russell, Ridgley, Pugh and Pugh; West Midlands Housing Association Planning Consortium; Storm Consulting; Archdiocese of Birmingham; Wearing, Steve; Brandon Estates Ltd

No. raising the issue	22
Council response	The level of whole plan supply buffer is justified in the Development Needs Topic Paper (SD11) paragraphs 2.8-2.23.

Issue	Absence of evidence to demonstrate claimed delivery rates on South West Rugby and Houlton will be achieved
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	Houlton is a development to the east of Rugby with permission for the delivery of 6,200 homes together with a district centre, local centres, open space, secondary school and primary schools. It also provides space for retail, financial services, restaurants, a hotel, community uses, assembly and leisure, as well as commercial and employment uses. Outline permission was granted in 2014 and updated through a s73 in 2017. Urban and Civic are the master developer of the site and have already provided all the significant infrastructure e.g. the main vehicle, walking and cycling route. This has created serviced plots for house builders to acquire and submit reserved matters applications on. The plan below shows the development which has taken place to date within different key phases as of June 2025. The first completions on Houlton were in 2017/18 therefore the site has delivered consistently for 8 years (2017-2025) with an average of 239 dwellings per annum being delivered. Over the new plan period average completions of 180dpa are assumed on this site. As explained in the Development Needs Topic Paper (SD11) a more modest target has been assumed compared to past delivery, in line with Lichfields' <i>Start to Finish</i> research, however this has potential to be exceeded. For South West Rugby, first completions on the site are expected in 2026-27. This therefore implies a build rate of 219dpa across the site over the plan period. This is relatively high, compared to national averages, but is realistic in a borough with a strong track record of delivering large urban extensions including Houlton as detailed above. As detailed in the Development Needs Topic Paper The absence of a master-developer at South West Rugby and greater fragmentation of land ownership is likely to give rise to more competition and more sales outlets on site, driving more rapid delivery.

Issue	205 units from 'other allocations in the Local Plan' do not have planning permission despite being allocated in the adopted plan and therefore cannot be considered deliverable.
Who raised the issue	Vistry Group
No. raising	1

the issue	
Council response	The other allocations under local plan 2011-2031 are as below (this is an extract from Appendix 1 to the Development Needs Topic Paper (SD11). As can be seen, of the 205 units, 165 are on sites within planning permission. The remaining 40 units are on sites that do not yet have planning permission, but which were under the Local Plan 2011-2031 subsumed into settlement boundaries and can effectively come forward as windfall. As these sites are not claimed to deliver dwellings in the next five years, the NPPF test is not that they are deliverable, but that they are developable i.e. a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged. The point envisaged is by 2042. This test is met for these sites.

Site	Status	Number of units	Completed to date	total from 2025-2042
Main rural settlement allocations				
Wolvey Campus, Wolvey (Countryside Properties)	Detailed R22/0113 - 90 Units	90	89	1
Land at Coventry Road, Wolvey (O'Flanagan Homes)	Detailed R22/0670 - 11 units	11	0	11
Land North of Coventry Road, Long Lawford (Bloor Homes)	Detailed- R17/1089- 149 Units	149	51	98
Land off Squires Road, Stretton on Dunsmore	Outline- R17/1767- 55 Units	55	0	55
Plott Lane, Stretton on Dunsmore	Revised application not yet received	25	0	25
Linden Tree Bungalow, Wolston	Application not yet received	15	0	15

Issue	Affordable housing need figure is incorrectly based on a plan period of 2025-2043 - the annual requirement for a 2025-2042 plan period should be 478 dpa not 474
Who raised the issue	Mr and Mrs Hudson; Kang, Jane; Critchley, P; Russell, Ridgley, Pugh and Pugh
No. raising the issue	8
Council response	This comment is a reference to the Updated Housing Needs Evidence (document SD3) rather than to the plan itself. Document SD3 models affordable housing need over a period to 2043. However, the figures for estimated need are presented in the evidence as annualised. Therefore the exact plan end date makes very little difference. For completeness document H3 provides an addendum to document SD3 in relation to affordable housing need over the 2025-42 plan period.

Issue	No reference to potential to accommodate Coventry's unmet need carried forward from the adopted local plan which runs to 2031
Who raised the issue	Rosconn Group; Warwickshire Property and Development Group (site 90)
No. raising the issue	2
Council response	RBC has considerably over-delivered against the housing requirement in the Local Plan 2011-2031 in the plan period to date. As detailed in the Authority Monitoring Report 2024-25 (CD19) 9,639 homes have been delivered against a requirement of 8,421 homes. Over-delivery of 1,218 homes.

	The Local Plan 2011-2031 set its housing requirement to include 2,000 homes in unmet need from Coventry but didn't ring-fence or identify specific sites to meet this part of the requirement. The 2011 Local Plan requirement was based on the Coventry and Warwickshire Joint Strategic Housing Market Assessment 2015 (SHMA 2015). That evidence, which formed the basis for the unmet need, is more than 10 years old and is not based on the standard method for calculating housing need set out in current national policy and guidance. As both Coventry CC's and RBC's existing local plans are greater than 5 years post adoption, both of their SHMA 2015-derived housing requirements are deemed by national policy to be out-of-date. Similarly, plan-making in both authorities is required by national policy to be based on up-to-date evidence applying current national policy and guidance. Based on that up-to-date position there is no unmet need from Coventry as confirmed in the Memorandum of Understanding between Coventry and Warwickshire authorities (SOCG17) and the statement of common ground with Coventry City Council (SOCG2). Therefore, the fact that in 2015 there was unmet need is now immaterial.

Issue	Need for care accommodation is not included in standard method - housing need should be uplifted to included assessed need for care units
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	The standard method is based on two components, table 125 dwelling stock (including variants) and median workplace-based affordable ratios (for dwellings). Both inputs use "dwellings". Neither of these inputs defines what it means by "dwellings". For this, we need to look at Census 2021 information. The census definitions are here. A dwelling "is a unit of accommodation that may comprise one or more households. If it contains more than one household, then it is a shared dwelling. Most dwellings contain only one household.". A household is "one person living alone or a group of people, not necessarily related, living at the same address who share cooking facilities and share a living room or sitting room or dining area". In the census those not living in dwellings are generally living in communal establishment accommodation. A communal establishment is "An establishment providing managed residential accommodation. "Managed" in this context means providing full- or part-time supervision of the accommodation. Communal establishments exclude all sheltered accommodation, serviced apartments, houses rented to students by private landlords, and nurses' accommodation. These are defined as households.". Communal establishments do specifically include "medical or care establishments". Therefore, the dwelling-based components of the standard method do not include C2

	care homes. However, they would include other types of accommodation in the older persons' sector in which care is often provided, for example extra-care housing. So, to the extent that Vistry are arguing that housing (i.e. dwelling) need needs increasing to accommodate additional housing with support, this position is incorrect. As dwellings, this type of housing is already baked into the standard method which provides an undifferentiated housing need that is not broken down by type and tenure. The position is different for C2 residential care/nursing care bedspaces. These are not baked-in to the standard method but sit outside it. However, the Planning Practice Guidance (Paragraph: 026 Reference ID: 68-035-20190722) that these bedspaces can be counted as part of housing supply, stating: "Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market." The Updated Housing Needs Evidence (SD3) provides at Table 7.8 estimates for the need for specialist older persons' accommodation. This includes a need for 326 bedspaces in residential care and nursing homes by 2043. Using the housing delivery rulebook method, this would equate to 136 dwellings. Should the plan requirement for general housing be increased by this amount to try to deliver care homes? Our view is no. This would be an extremely blunt and ineffective method of delivering care homes because new allocations would be more likely to be taken up by general market housebuilders unless specific allocations for care homes could be made. But with no potentially suitable sites being promoted for the development of care homes, that is not likely to be an effective option. Therefore, simply leveraging up the overall housing requirement would not be an effective way to deliver care homes.

Issue	Plan period is too short to comfortably cover the 15-year requirement
Who raised the issue	Ashberry Strategic Land; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Persimmon Homes (Central); Catesby Strategic Land; Kang, Jane; Critchley, P; Miller Homes; Catesby Estates; Russell, Ridgley, Pugh and Pugh; Storm Consulting; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Latimer Developments Ltd; Richborough (Clifton upon Dunsmore); Rosconn Group; Mackenzie Miller Homes; Warwickshire Property and Development Group (site 90)
No. raising the issue	27
Council response	The council aims to submit the plan for examination in late April 2026. If the plan proceeds through examination efficiently it can be adopted by the council before 1 April 2027 giving 15 years to run on adoption. If examination is more protracted and the plan cannot be adopted until (say) 1 May 2027, the plan would still have 14 years and 11 months to run from adoption. The additional 1 month of housing supply in 2042 that the plan would be missing from the 15 years would make little real-world difference because (1) all allocations in the plan are likely to be built out before 2042 anyway, (2) with rolling 5-year plan reviews a plan adopted in 2027

	would have been reviewed 2-3 times before 2042 is reached. Conversely, there are clear reasons why now is not the right time to plan to 2045 or beyond as is suggested by some representors: - This plan is being prepared under a soon-to-be-superseded 2024 NPPF and under temporarily saved provisions of the Planning and Compulsory Purchase Act 2004. In other words, under the legacy system. A plan looking ahead to the mid-2040s or beyond would be better prepared under new national policy and the new plan-making system. - In July 2026 announcements are expected on both the geography of a new strategic authority for Warwickshire and a new unitary authority covering the area of Rugby Borough. Rugby Borough Council will cease to exist on the reorganisation date of 1 April 2028. Very long-term planning would be better done by the new strategic authority through its Strategic Development Strategy and by the new unitary authority through its new-style local plan. This will enable all the benefits that have led to a reintroduction of strategic planning to be realised in terms of looking at a broader area and coordinating with long-term infrastructure investment. Similarly, the new unitary authority that would be tasked with implementing the plan in the 2040s would be better placed to make the plan. Together, this would result in a more coordinated approach.

4.9. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Policy S2 should specify that the housing requirement figure is a minimum, in line with NPPF para 62.	Inside Land Group; Catesby Strategic Land; Catesby Estates
Plan period should be extended to meet the 15-year requirement (most suggest to 2043 or 2045)	Ashberry Strategic Land; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Miller Homes; Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Catesby Strategic Land; Critchley, P; Vistry Group; Storm Consulting; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Latimer Developments Ltd; Rosconn Group; Warwickshire Property and Development Group (site 90); Brandon Estates Ltd
Buffer should be increased to at least 10% or 15-20% to reflect SUE delivery risks, market absorption constraints, and/or affordable housing needs	Ashberry Strategic Land; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Critchley, P; Russell, Ridgley, Pugh and Pugh; Storm Consulting; Archdiocese of Birmingham; Latimer Developments Ltd; Rosconn Group; Warwickshire Property and Development

	Group (site 90); Brandon Estates Ltd
Windfall provision should be reduced to accord with proportionate evidence.	Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Critchley, P; Russell, Ridgley, Pugh and Pugh
Ensure 205 affordable homes delivered per annum in order to meet 170 affordable homes shortfall in figures	Bilton Grange School; Mr and Mrs Hudson; Critchley, P
Increase housing requirement (and allocate further sites) suggested to 721pa (Richborough, Warwickshire Property and Development Group)	
Additional strategic policy should be added to ensure suitable homes are allocated within Neighbourhood Plans	Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Critchley, P; Russell, Ridgley, Pugh and Pugh
Remove previously allocated sites which have not come forward from the trajectory and total figure	Vistry Group
All sites over a certain size should offer plots for self-build or independent builders. The number of plots allocated for self-build/independent building must be stated in the plan and enforced.	O'Connell, Mark
Increase the windfall supply by 400 units to account for likelihood that windfall developments of 5 dwellings and over come forward (as has consistently occurred in recent years).	Allanach, Richard
Council response to modification proposals: Proposed modifications relating the plan period and housing requirement, buffers and windfall allowances have been addressed in the S2 main issues section of this statement. The Council considers its current strategy for homes is reasonable and justified.	

POLICY S3 STRATEGY FOR EMPLOYMENT LAND

- 4.10. 27 representations on behalf of 329 people or organisations argued that policy S3 is unsound.
 Three representations on behalf of three people or organisations argued that the policy is sound.
 The main issues for this policy are listed below.

Issue	West Midlands-wide study area fails to accurately consider the large-scale logistics development around Rugby, meaning the requirement exceeds genuine local need
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298 (including group responses)

Council response	It is correct that the scale of large-scale logistics development around Rugby has been high. Appendix 2 of the Development Needs Topic Paper (SD11) records 314,838m² (3,338,888ft²) of B8 floorspace completed in the borough in just the last 5 years. We are also aware that this excludes large logistics developments close to the town of Rugby but outside of the borough boundaries at DIRFT and Magna Park. We are aware of resident concern about this scale of development of this development. Back at issues an options stage 36 responses including several parish councils expressed concern about this and this was also reflected at issues and options stage. It is also correct that the requirement for employment land incorporates a contribution to sub-regional rather than genuinely local need. However, this is in accordance with the duty to cooperate on strategic cross-boundary issues.

Issue	Emphasis on B8 logistics uses does not provide high quality employment for residents and is at risk from trend of automation.
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298 (including group responses)
Council response	We agree that this is a risk for the borough and this was highlighted back at issues and options stage. This is why the first objective of the plan is to support the diversification of the borough's economy. This in turn is informed by the Rugby Borough Economic Strategy 2025-2035 (document SD17) which sets as a long-term goal "diversifying inward investment to ensure our ideal location for logistics and transport does not create an over-reliance on this sector." The plan seeks to deliver that diversity in the following ways: Requirements on the allocations at Coton Park East and Walsgrave Hill to deliver smaller units Ring-fencing the proposed Ansty Park north expansion for B2, light industrial and R&D uses Developing on the existing cluster of non-B8 uses at the edge of Coventry where the evidence suggested greatest opportunity for diversification exists. This is explained more in the Green Belt Exceptional Circumstances Topic Paper (GBD4).

Issue	Policy S3 underestimates future employment land need because it fails to take account of recent trends or is out of date or otherwise underestimates need
Who raised the issue	Windsor Developments Limited; S&D Postlethwaite; BARJANE; Stoford Properties Ltd; Windsor Developments (Site 145); Warwickshire Property and Development Group (site 18); Warwickshire Property and Development Group (Site 20)
No.	8

raising the issue	
Council response	There are three separate points here, not all of which were raised by every respondent listed. However, they are grouped together as they are interrelated points. In relation to recent trends, this point was responded to in Appendix A1 of the HEDNA – WMSESS Alignment Paper Addendum (SD6). Nurton, for example, argue for the use of a three-year trend. The use of a short-term trend would not be justified because it would not adequately capture the full economic and property market cycle. Additionally, in recent years, demand for strategic units has been driven by a number of exceptional, one-off factors, which are unlikely to persist in the longer term forecast period to 2045 and beyond. Factors such as Brexit, port disruptions such as the Suez Canal and the pandemic have driven stock holding requirements to secure UK supply chains. These drivers created a temporary uplift in demand that does not represent a longer-term trend. A similar criticism is made by Stford citing past trends in the borough. The evidence base is regional/subregional. The WMSESS sets out a regional requirement and apportsions taking account of areas that have historically been constrained, rather than simply rolling forward past trends. As explained in the alignment paper addendum, it is inappropriate to focus narrowly on individual districts and assume that the pattern of past supply is replicated. The evidence is adequately up to date. The WMSESS was published in August 2024 and updated local needs evidence was prepared through the alignment paper in November 2024 and then again corrections were made in the alignment paper addendum in November 2025. The WMSESS is a complex piece of work undertaken on behalf of and with input from 25 local authorities and the West Midlands Combined Authority. The WMSESS used data up to April 2022, the latest data available at the time. Without a full update for the whole of the region, up to date data cannot be used to update the modelling. It is therefore suitable for RBC to net off any completions from April 2022 onwards, as the Council have done in the Development Needs Topic Paper. It is totally unrealistic to continuously update the WMSESS study on a rolling basis, the study is adequately up to date. Some of the specific critiques of the evidence on need are picked up as separate issues in this consultation statement addendum. As a general point, however, no projection of future need for employment need is <i>correct</i>. Projections are decision-aiding tools that try to anticipate what will happen in future. The requirement in national policy is to demonstrate proportionate evidence and an objective assessment of needs. The council has done that. It has recognised the larger-than-local nature of employment need and the limitations of pure trends-based planning. On that basis it has joined with authorities across the West Midlands to produce regional evidence which employs a replacement demand and freight volumes based model to derive non-trends-based regional need for larger sites. It has then combined this with trends-based 'local need' for smaller sites through an alignment paper which was then updated. The council is planning to meet the evidence identified in this evidence in full.

Issue	Plan period is not sound as not positively prepared, consistent with NPPF or justified
Who raised the issue	Prologis UK Limited; Mountpark Logistics EU Sarl; Stoford Properties Ltd; Mitchell, Stuart
No. raising the issue	4
Council response	The same issue was raised by residential omission site promoters and is discussed above. The response is substantively the same here. The plan-period is not an issue of whether the plan is positively prepared or justified. It is purely an issue of consistency with the NPPF.

Issue	Inadequate contribution to Coventry unmet need and/or Coventry unmet need is higher than Coventry City Council assert
Who raised the issue	Tarmac Trading Ltd; BARJANE; Stoford Properties Ltd; Swanvale Developments Ltd; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes; Tritax Big Box Developments Ltd (Site 17); Prologis UK Limited
No. raising the issue	10
Council response	The calculation of Coventry unmet need is a matter for the examination of Coventry's plan which is ongoing. RBC needs to respond to the information provided by Coventry as to the extent of that unmet need. The plan can contribute to meeting Coventry's unmet need. It does that alongside delivering a step change in the level of large-site strategic development compared to the 2011-2031 Local Plan from an already high base. RBC is only one of Coventry's neighbouring authorities and North Warwickshire, Nuneaton and Bedworth, Warwick and/or Stratford districts may also be able to contribute. Ultimately, unmet need is for supply towards the back end of Coventry's plan period in the late 2030s/early 2040s. If this cannot be met through the current round of plan-making, then an SDS is being produced for the West Midlands Combined Authority and will be produced for Warwickshire. This would be an appropriate mechanism for dealing with any remaining shortfall.

Issue	Failure to accommodate unmet need from Harborough District Council of 146,000sqm
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising the issue	4
Council response	The council's evidence base is that Harborough District is in a different functional economic market area to Rugby Borough and therefore it is questionable whether it would

	be appropriate to shift employment need between the two authorities. In any event Harborough is not reporting unmet employment need as confirmed in the statement of common ground (document SOCG3). If there is unmet need from Harborough this would be addressed in the Leicester and Leicestershire housing market area and functional economic market area.

Issue	The HEDNA-WMSESS Alignment Paper Addendum (SD6) identified an error in the WMSESS which had counted the country park at Coventry Gateway South in Warwick District as developable area. This resulted in a reduction of 90ha in the supply calculated in the WMSESS. The Alignment Paper Addendum recommended that 50ha of this supply should be made up in opportunity area 7 in which Rugby Borough lies with the rest to be made up elsewhere in the West Midlands. Respondents argued it should all be made up in Rugby Borough. Some of the responses claim other errors in calculating supply.
Who raised the issue	Manse Opus and Rolls Royce Plc; Prologis UK Limited; Mountpark Logistics EU Sarl; BARJANE; Stoford Properties Ltd; Ashfield Land; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes; Warwickshire Property and Development Group (site 18); Warwickshire Property and Development Group (Site 20); Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	13
Council response	The alignment paper addendum identified a need for up to 2 additional 50 ha sites across region to meet the highest end of the need range (Para 2.9) and stated it would be appropriate for at least one to be apportioned to Area 7 (Coventry/Rugby). A further 50ha site to meet the highest end of the range could be considered within elsewhere in Coventry and Warwickshire or equally in another part of the region. 50ha equates to 1.5% of the need show at the higher end of the gross need and this is well within the margins of long-term forecasting. The council does not consider that there are other supply errors in Rugby Borough. One response argued that the Coventry airfield Gigafactory site shouldn't be counted as supply because it is reserved for battery manufacturing. We disagree; this is still a B2 use on a strategic scale site.

Issue	Not enough land is allocated; there should be a non-implementation buffer
Who raised the issue	Barberry Ansty Limited; Mountpark Logistics EU Sarl; Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	3
Council response	The question of buffers for employment land was considered in the Development Needs Topic Paper (SD11) under the heading "Should an employment land headroom/buffer be identified". The council's position is set out there. In short, the evidence base already

	builds in supply buffers.

Issue	Plot ratios used in evidence are too high. Plot ratios are below 0.35
Who raised the issue	Windsor Developments Limited
No. raising the issue	1
Council response	This point was considered in section 4 of the HEDNA-WMSESS Alignment Paper Addendum (SD6) wherein it is concluded that the plot ratios are justified.

Issue	A single office allocation does not meet identified need (S&D Postlethwaite) S3 does not positively plan for digital-intensive employment, contrary to NPPF expectations (Everwell).
Who raised the issue	S&D Postlethwaite; Everwell Development and Mactaggart Family & Partners
No. raising the issue	2
Council response	These are two separate issues but are addressed together for convenience. As set out in the Development Needs Topic Paper, the level of office floorspace planned for is justified by the evidence base. In relation to digital-intensive employment, this is understood to be a particular sector. The local plan is a land use plan; it plans for land uses generally (in the case of employment land) by reference to use classes in the 1987 Town and Country Planning (Use Classes) Order (as amended). It is not possible to plan for particular occupiers or categories of occupiers because local planning authorities do not exercise control over who occupies buildings.

Issue	S3 is unsound because it fails to address the identified need for smaller employment units within the Borough
Who raised the issue	Mr N Williams and Miss E Williams the landowners of Land at Mill House, Dunchurch; Ansty Parish Council; Richborough Commercial (M45 J1); Mitchell, Stuart
No. raising the issue	5
Council response	Although the evidence base combines a need for strategic sites and a 'local' need for smaller units, a single industrial land requirement is set. Large units are built on small sites and vice versa. Setting different requirements for smaller and larger buildings would create a planning policy that would be impossible to implement and monitor, given that local plans and DM decisions seldom determine the specific size of units that can be built on sites, which is generally market-led.

	There is, however, clearly a quantitative and qualitative identified demand for smaller units. In response to this, the plan specifically requires smaller units to be delivered on the sites at Coton Park East and Walsgrave Hill.

Issue	Brownfield recycling assumption in the WMSESS is too high
Who raised the issue	Prologis
No. raising the issue	1
Council response	‘Replacement’ of older stock is a significant driver of demand – in the MDST model (used in the WMSESS), it drives 88% of the road-based need (WMSESS Para 10.34). Lichfields for Prologis misinterpret the WMSESS – they suggest the WMSESS is assuming 50% of need will be met brownfield recycling. This is wrong – the position is 25%. The MDST model has a recycling adjustment of 860ha (equivalent to 25% of need). This consists of 20% of total need (626ha) and a further 30% of pre-2015 stock on strategic sites (234ha). The 20% of total need component is based on all strategic units, not just strategic sites and is hence much higher. The 30% component is based on strategic sites. The gross completions model used in the WMSESS also has a recycling adjustment of 390ha = 50% of pre-2015 strategic site stock (equivalent to 13% of total need). As the MDST model is primarily driven by its replacement demand component, it was considered more suitable to apply a greater brownfield recycling component. It is realistic to assume that replacement of obsolete buildings occurs onsite, particularly on existing strategic scale sites, rather than on new green field land.

Issue	Labour Demand and VOA models (used in the HEDNA 2022) should have been used in the Alignment paper
Who raised the issue	Prologis
No. raising the issue	1
Council response	The labour demand and VOA models don’t allow any split between smaller and big box needs and therefore do not allow alignment between local need and the WMSESS strategic need to be considered. Furthermore, neither model captures the effects of replacement demand. In Tables 9.14 / 9.15 in the HEDNA these models were showing a significantly lower scale of need.

Issue	The need being planned for now is lower than was shown in the HEDNA 2022 (particularly for local need)
Who raised	Prologis, Nurton, Stoford, Tritax Big Box

the issue	
No. raising the issue	1
Council response	Analysis within the alignment paper shows that the local + strategic requirements do not hugely deviate from the 2022 HEDNA, the distribution between local and strategic needs is just more skewed to strategic sites. Para 3.22 of Alignment Paper 2024 states that the HEDNA 2022 set out total need of 1,173ha for Coventry and Warwickshire over the 2021-50 period. The Alignment Paper Addendum 2025 indicates C&W requirement of 1,466 to 1,648ha for 2021-50 period. Therefore, total employment land need is higher than was shown in the HEDNA 2022.

Issue	The maths is wrong in Nov25 Alignment Paper Table 1.4
Who raised the issue	Prologis
No. raising the issue	1
Council response	Differences are marginal – 1-2 ha over 20-30yrs.

Issue	Adjusting in the WMSESS for large units on small sites perpetuates a sub-optimal situation in under-providing strategic sites. The WMSSESS reduces the strategic site need by 25% (net) to reflect the fact that some large units will be built on smaller sites. However, the uplift to Coventry and Warwickshire local need to reflect strategic units on non-strategic sites is only 10-13%. There should be a greater uplift to C&W local need.
Who raised the issue	Prologis
No. raising the issue	1
Council response	This issue within Coventry and Warwickshire is addressed through the Alignment Paper which brings together strategic and non-strategic sites need. RBC has taken this into account in setting out employment land requirements in the plan. Allocations in the plan include new strategic sites and expansions to existing strategic scale sites. Paragraph A1.15 of the Alignment Paper Addendum (SD6) responded to this issue. The proportion of strategic units on smaller sites is lower in Coventry and Warwickshire than in other parts of the region.

Issue	Savills demand estimates (submitted by the representor) show a higher need

Who raised the issue	Tritax Big Box
No. raising the issue	1
Council response	Savills use a suppressed demand model (at 8%) to forecast a 17-year need of 961ha for Coventry & Warwickshire = 56.5ha per annum Comparing this to Alignment Paper 2025 – total C&W need of 1,466 – 1,648ha for 2021-50 period = 50.6 to 56.8ha per annum. Iceni evidence is therefore broadly in line with Savills modelling at the upper end of the range. Savills state that 76% of need (727ha) should be met within strategic units – this confuses strategic sites and strategic units, and so is not directly comparable to WMSESS and Alignment Paper evidence. Savills then compare this to the 2022 HEDNA instead of the latest evidence presented in the Alignment Papers 2024 / 2025. Savills derive a Rugby Borough-based need based on historic demand - equivalent to 32% of C&W need = 305ha all industrial of which 230ha is for strategic units. This compares to 2025-42 gross employment requirement for large sites (note this is not the same as strategic units) of 226ha and an overall requirement of 284ha identified in Development Needs Topic Paper. Savills apportionment to Rugby is subjective and just rolls forward historical trends

4.11. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Delete paragraph 1.26 on page 14	Manse Opus and Sir Thomas White's Charity
The policy should be reworded to caveat other types of development such as modern technology and digital infrastructure.	Everwell Development and Mactaggart Family & Partners
S3 should address the need for industrial units of uses (E(g)(iii), B2 and B8) smaller than 9,000m ² as identified in the WMSESS.	Mr N Williams and Miss E Williams the landowners of Land at Mill House, Dunchurch; Mitchell, Stuart
Extend plan period	Prologis UK Limited; Mitchell, Stuart
Correct supply side errors	Prologis UK Limited
Plan for 45ha of Coventry unmet need	Prologis UK Limited; Tarmac Trading Ltd
Express requirement as a minimum as required by NPPF	Prologis UK Limited
Split requirement for B2, B8 and E(g)(iii) uses into separate requirements for needs for Rugby and needs for the FEMA with	Richborough Commercial (M45 J1)

new rows for completions and supply numbers against these categories	
Specify that employment land need is between 0.5 million and 0.95 million sqm and that this shall be met with only two new allocations: Site 15 (North of Ansty Park) and Site 95 (Crown Fields Farm).	Allanach, Richard
Council response to modification proposals: For the reasons explained above the council does not consider any of the proposed modifications are needed to address issues of soundness.	

POLICY S4 SITES FOR GYPSIES AND TRAVELLERS

- 4.12. Six representations on behalf of 113 people or organisations argued that policy S4 is unsound. Two representation on behalf of 299 persons or organisations argued that the policy is sound. The following main issues were raised with Policy S4.

Issue	Potentially too few pitches planned for the whole plan period with potential to call into question if the plan has been positively prepared in this regard
Who raised the issue	Rooney, John and Patrick
No. raising the issue	2
Council response	This comment is understood to be raising the issue of inadequate supply rather than questioning the requirement evidence. In relation to supply, the supply position is set out in the Gypsy and Traveller Supply Position Note (SD10). This shows 68 pitches of supply identified against a requirement for 94 pitches 2024-2042. This is adequate to provide supply up to 2037 i.e years 1-14 of the plan period. Planning Policy for Traveller Sites para 10 requires, in producing a local plan, authorities to identify a supply of specific deliverable sited for years 1-10 and 'where possible' for years 11-15. The council has done this. Therefore, the plan submitted is consistent with national policy.

Issue	Lost opportunity to allocate a larger number of pitches at Bryants Bungalow site to meet longer term needs and improve soundness of the plan
Who raised the issue	Rooney, John and Patrick
No. raising the issue	2
Council response	The council has assessed the ability to accommodate further pitches at Bryants Bungalow. The additional areas suggested by the landowner are affected by flood risk and so the council's view is that there are not further opportunities for intensification at the site.

Issue	Policy should be expanded to require enforcement action by RBC for sites which are subsequently developed without consent
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	Enforcement action is taken when considered expedient. This needs to be assessed on a case by case basis. The council cannot through a local plan bind future decision-makers to take enforcement action.

Issue	S4 is unsound because it does not direct Gypsy & Traveller pitches towards the most sustainable locations where harm to the Green Belt is avoided/exceptional circumstances not demonstrated
Who raised the issue	Manse Opus and Rolls Royce Plc; Stoford Properties Ltd; BRAID (Barnacle Residents)
No. raising the issue	109
Council response	The Council's case on exceptional circumstances for Green Belt release for Gypsy and Traveller pitches is set out in the Green Belt Exceptional Circumstances Topic Paper (document GBD4).

Issue	It is unclear whether the Council has assessed the potential for additional pitch development on existing sites and the occupancy of permanent pitches to address the shortfall or considered the issue of unauthorised encampments in the Borough, both specifically recommended in the GTAA.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	The council has assessed the potential for additional pitches on existing sites as identified in table 6.4 of the GTAA. This was how the opportunity for additional pitches at Bryants Bungalow and the new site at Wilshere Ranch which area proposed allocations were identified. These opportunities have been taken up. The GTAA also identified opportunities for the regularisation of temporarily permitted or unauthorised pitches. There were principally at Top Park, Barnacle (which at the time was part temporarily authorised and part unauthorised, but now all has temporary permission) and at Rosefields. All of these sites are proposed for allocation in the plan. Therefore, the council has taken up these opportunities.

Issue	Five year land supply for gypsy and traveller pitches not identified as required by PPTS para 10.

Who raised the issue	Miller Homes
No. raising the issue	1
Council response	The Gypsy and Traveller Supply Position Note (SD10) sets out the supply position. This shows a five year supply can be demonstrated on plan adoption. This document will be updated as necessary through the examination.

Issue	Allocations at Top Park are unsound because the existing pitches are primarily not occupied by members of the Traveller community (advertised for rent on the open market) and genuine need is therefore unjustified.
Who raised the issue	BRAID (Barnacle Residents)
No. raising the issue	107
Council response	The need assessment was based on the GTAA research with visits to sites and discussion with members of the Gypsy and Traveller community. If pitches are being rented to non-Gypsy/Traveller occupants in contravention of the terms of a temporary planning permission, then this should be reported as an enforcement enquiry which would be investigated by the council's planning enforcement officers.

Issue	Increase in areas committed to G&Ts around Shilton, Ansty & Barnacle will exacerbate existing problems to local community.
Who raised the issue	Foss, Jeremy
No. raising the issue	1
Council response	The local plan proposed allocations of pitches in this area at Top Park, Barnacle (22 pitches) and at Wilsher Ranch, Shilton (4 pitches). The pitches at Top Park already benefit from temporary planning permission. Approximately half of the pitches on that site have been occupied for more than 20 years and the remaining half since approximately 2020. The 4 pitches at Wilsher Ranch are therefore the only “new” pitches proposed through the plan in this area. As discussed in the Green Belt Exceptional Circumstances Topic Paper (GBD4) and as has been made clear in responses to consultations undertake in the preparation of this plan there are clear resident concerns about the concentration of pitches in this part of the borough. As set out in the topic paper, the council considers that the need to deliver supply tells in favour of the allocation of pitches where opportunities exist. However, this will be a matter to be considered through the examination.

POLICY S5 COUNTRYSIDE PROTECTION

- 4.13. 100 representations on behalf of 1,144 people or organisations argued that policy S5 is unsound. Two representations on behalf of 885 people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Local Plan allocates 1500 homes on land to be released on Green Belt - policy to protect Green Belt is therefore not followed
Who raised the issue	James , Charles; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Spencer, June; Court, Gerry & Carol; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Penman, Judith; Cunliffe, Stephen; Hilliard, Robert; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Yates, Alan; Hawkins, John; Crosby, Ralph; Crosby, Sheila; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Leach, Wendy; Cox, Roger; Black, John; Hawkins, Rachel; White, Claire; White, Garrie; Nycz, Janina; Chrimes, Brian; Wiltshire, Lindsay; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; West, Annette; Gillman, Sarah Elizabeth; CPRE; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Long Lawford Residents ; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; William Davis Homes (site 315); Gillman, Keith Neville; Reeve, Michael David; Lumsden, Jennifer; Wolston Parish Council; Reeve, Kathleen; Ward, John; Fisher, Hilary; Fisher, Michael; Kelly, Patrick and Linda; Sheffield, Andy; Downes, Steve and Allyson; Hilliard, Sharon; Lovett, Lorna; Lovett, Peter; Lee, Joanne
No. raising the issue	817 (including group responses)
Council response	The issue here is the proposed allocation of residential sites in the Green Belt (policy S6) and the overall strategy for homes (policy S2) rather than policy S5 itself. Matters relating to the Green Belt status of specific sites are dealt with in the section for policy S6 below, but the broader point is addressed here. National policy on the alteration of established Green Belts is laid out in NPPF (2024) paragraphs 145-148. In sum, these specify that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans, that such circumstances include instances where an authority cannot meet its identified need for homes through other means, and that the demonstration of exceptional circumstances is dependent on all other reasonable options having been fully examined. The NPPF then goes on to state that when Green Belt release is necessary, plans should prioritise previously developed land, then undeveloped grey belt, and finally other Green Belt locations – while keeping in mind the need to promote sustainable patterns of development. As explained in pages 21-32 of the Green Belt Exceptional Circumstances Topic Paper (GBD4), the Council's position is that exceptional circumstances exist for the release of Green Belt for residential development. These circumstances are demonstrated via the assessment and subsequent rejection of all other reasonable options, and the sustainability and other benefits of the proposed Green Belt allocations.

	Given the above, the Council's position is that the release of Green Belt for residential allocations proposed by the plan is consistent with national policy and does not undermine policy S5 which, if adopted, shall continue to afford protection to the Green Belt moving forward.

Issue	The Council's evidence is contrived and seeks to identify large areas of Green Belt as 'Grey Belt' - these areas are needed to safeguard the countryside from encroachment.
Who raised the issue	Ling, Philip; Mooney, Diane; Jackson, Geoff; Penman, Judith; Hilliard, Robert; Winterburn, Gillian; Winterburn, Stephen; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crosby, Ralph; Crosby, Sheila; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Leach, Wendy; Cox, Roger; Ward, Samantha ; Hawkins, Rachel; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; West, Annette; Gillman, Sarah Elizabeth; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; Gillman, Keith Neville; Reeve, Michael David; Thompson, Ian & Angela; Lumsden, Jennifer; Reeve, Kathleen; Ward, John
No. raising the issue	60
Council response	This issue is about the Green Belt Contribution Study (GBD1 and GBD2) which forms part of the plan's evidence base. The Study was undertaken by a suitably qualified team from an independent consultancy using a methodology that aligns with national guidance. The Study does identify much of the borough's Green Belt as potentially meeting the definition of grey belt; however, this is only a result of a dispassionate and transparent application of the methodology – the Study does not 'seek' or actively set out to identify any particular areas as grey belt. Furthermore, due to the way that grey belt is defined by national policy, the contribution that an area makes to safeguarding the countryside from encroachment (Green Belt purpose C) has no bearing on its grey belt status. Therefore, as is recognised by the Study, land can both contribute to purpose C and meet the definition of grey belt. In sum, the council deem the Green Belt Contribution Study to be a robust piece of evidence which aligns with national policy and guidance on the subject.

Issue	Policy should be linked to EN3 and I5 to ensure there is no inappropriate development in Rainsbrook Valley
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	The policy already applies to the Rainsbrook Valley because it is outside of settlement boundaries. The council does not deem it necessary to explicitly link the policy to EN3 and I5.

Issue	S5 is unsound because it prevents the potential development of data centres and other essential digital infrastructure in rural locations.
Who raised the issue	Everwell Development and Mactaggart Family & Partners
No. raising the issue	1
Council response	It is unclear what “digital infrastructure” refers to. Telecommunications infrastructure would be covered by Policy I3 Communications infrastructure. Data centres are a form of employment development, often classified as a use class B8 use. S5 in combination with policy E2 does provide for circumstances in which employment development outside of settlement boundaries will be permissible.

Issue	Policy S5, and criterion A is contrary to the emerging NPPF Policy S5 criterion J, which applies to employment development where it is well related to an existing settlement, or it is for storage and distribution uses.
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The plan has been produced under the legacy planning system and therefore it is not reasonable to expect its policies to fully align with emerging national policies that are yet to be implemented. S5 in combination with policy E2 does provide for circumstances in which employment development outside of settlement boundaries will be permissible.

Issue	Level of grey belt designation is not consistent with the obligations in the NPPF to ensure separation of urban communities and prevent damage to wildlife & environment.
Who raised the issue	Thompson, Ian & Angela
No. raising the issue	2
Council response	This policy (S5) does not designate areas of grey belt, but the Green Belt Contribution Study (GBD1 and GBD2) does identify much of the Borough’s Green Belt as potentially meeting the definition of grey belt. This is the result of a transparent methodology that aligns with national guidance. Areas that are found to contribute strongly to preventing neighbouring towns from merging (Green Belt purpose B) are not identified as grey belt, and therefore it is not the case that the results of the study are inconsistent with the NPPF in this regard. Preventing harms to wildlife and the natural environment are not purposes of the Green Belt per national policy, these matters are dealt with by separate national and local planning policies.

Issue	Site 145 (Brandon Lane) should be assessed as a grey belt site, released from the Green

	Belt and allocated for employment uses.
Who raised the issue	Windsor Development (Site 145)
No. raising the issue	1
Council response	The Council does not agree that the site meets the grey belt definition. Per the Green Belt Contribution Study (GBD1 & GBD2), it is deemed that the area in which the site is located makes a strong contribution to Green Belt purpose A. The Council has decided not to allocate the site, because of the reasons specified in the HELAA proforma (SS3, p.153), and therefore does not agree that there are grounds to release it from the Green Belt.

4.14. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
S5(A) should be clarified to specify that development will not be refused for being outside of settlement boundaries when it is on an allocated site.	Inside Land Group
The policy should specify that, when applying Green Belt policy, the delivery of nationally or regionally significant digital and data-processing infrastructure may constitute "very special circumstances"	Everwell Development and Mactaggart Family & Partners
Amend para B to require any development in the countryside to demonstrate that the character of the countryside is maintained to retain the countryside's setting and separate function	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Should take a more granular view on where development can occur in the countryside to be found sound	William Davis Homes (site 315)
Omission site should be identified as grey belt land and released from the green belt for allocated development	Windsor Developments Limited; Windsor Developments (Site 145)
Make cross reference to the spatial strategy and proposed grey belt and Green Belt release based on exceptional circumstances justifications	Miller Homes (Brownsover Road)
Boundaries of the grey belt should be redrawn closer to village of Wolvey and area from A5 down to intersection of B4114 & Temple Hill roundabout should remain green belt	Thompson, Ian & Angela
Council response to modification proposals: It is not necessary for the policy to state that development on allocated sites outside of settlement boundaries will be supported because local plans are read as a whole. It is not necessary to reference specific potential very special circumstances. The policy is not a landscape/character policy and so introducing this creates duplication. The plan does not define green belt boundaries. Overall, the council does not consider modifications are needed to address issues of soundness.	

POLICY S6 RESIDENTIAL ALLOCATIONS

- 4.15. 205 representations on behalf of 956 people or organisations argued that policy S6 is unsound. 24 representations on behalf of 322 people or organisations argued that the policy is sound.
- 4.16. Some respondents completed the representation form to comment only on the soundness of a specific site allocation and not Policy S6 overall. These representations are counted against the individual site allocations below but not against S6. As site allocations are listed in S6, this means that a higher number of respondents objected to S6 than is captured in the numbers above.
- 4.17. The following main issues were raised with Policy S6. Below the overall issues raised in response to Policy S6 are listed the main issues raised in respect of each of the proposed residential site allocations in the Proposed Submission Local Plan.

Issue	There isn't analysis under para 110 and 115 NPPF of how green belt allocations would promote sustainable development or how the requirement in 149e) that Green Belt boundaries will not need to be altered at the end of plan period. Stage 2 Green Belt evidence needed for the 10 Green Belt sites that were considered as 'grey belt'.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	NPPF para 148 states in reviewing Green Belt boundaries the need to promote patterns of sustainable development should determine whether a site's location is appropriate with particular reference to paras 110 and 155 NPPF. NPPF Paragraph 110 is about actively managing patterns of growth to support the transport objectives in paragraph 109 and focussing significant development on locations which are or can be made sustainable. Paragraph 115 is about prioritising sustainable transport, safe and suitable access, the design of streets and mitigating significant impacts from development on the transport network. It is clear from the evidence base that the sustainability of site allocations in transport terms by reference to the considerations in paras 110 and 115 has been a major consideration in preparing the plan. For example, the Stage 2 Site Assessment Report (SS8) includes for every site as its first topic area "Transport". This section includes a discussion of transport considerations affecting the site, analysis undertaken using the DfT Connectivity Tool, PTAL and congestion analysis derived from transport network analysis by SLR (documents SS15-SS18), together with where relevant reference to the Strategic Transport Assessment (documents I3-I6) and site access considerations. The transport evaluation then features prominently in the overall evaluation of each site. The Strategic Transport Assessment prioritises sustainable transport measures in its mitigation proposals, and these are tied back to individual sites by their inclusion in the site development requirements in the site allocations annex to the plan. Similarly, within the Sustainability Appraisal (CD5) transport is one of the headings in the SA Framework and is prominent in the discussion of spatial strategy options and in some

	cases individual sites. Transport considerations are also prominent in: 1. in the Rural Sustainability Study Report (SD14) which makes public transport accessibility an important factor in assessing the sustainability of rural settlements, and 2. in the Green Belt Exceptional Circumstances Topic Paper (GBD4), particularly in its discussion of the impacts of different spatial strategy options for employment on community patterns. Green Belt release for housing is located at main rural settlements which are the most sustainable rural locations in terms of access to services and transport links. The largest Green Belt allocation is at Long Lawford which is the Green Belt settlement with the strongest public transport and active transport connections to Rugby. In relation to NPPF paragraph 149e), the plan identifies land to meet housing and employment needs in full. Where land is allocated for development in the Green Belt, this land is removed from the Green Belt now rather than identifying broad areas and leaving Green Belt changes to a later plan. New defensible Green Belt boundaries are identified and, where necessary (for example south of Long Lawford) proposed to be created/reinforced through development requirements. This approach is consistent with NPPF para 149e) in that it creates no obvious need to alter Green Belt boundaries at the end of the plan period. However, it is not realistically possible to make an assessment now of whether green belt boundaries will need to be altered in 2042. Such an assessment would be pure speculation, in the same way as plan-makers working on the Rugby Core Strategy in 2010 would not have been able to predict the need for Green Belt changes to be proposed in 2026. In relation to the 'grey belt' sites, the stage 1 contribution assessment identified these as lying within areas of the borough suitable to be defined as grey belt. In the borough the principal purpose determining whether sites are grey belt purpose a) "to check the unrestricted sprawl of large built-up areas". Locations defined in the stage 1 assessment as provisionally grey belt were principally so defined because of their distance from the large built-up areas. This means that it was considered very unlikely that a stage 2 assessment of these sites would contradict the stage 1 finding and find strong contribution to purpose a), b) or c). Accordingly, a proportionate approach to evidence gathering was taken and these sites were not subject to more detailed assessment. This was an appropriate approach.
Issue	The residential site allocations contradict other strategic policies including S1 which directs development to the urban area (insufficient use of brownfield sites), and S5 which seeks to protect Green Belt land.
Who raised the issue	Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Spencer, June; Ling, Philip; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Fitzgerald, Elizabeth; CPRE; Kang, Jane; Monks Kirby Parish Council; Miller Homes (Brownsover Road); Hassell, Eve
No.	18

raising the issue	
Council response	In line with national policy the council's approach has been to look at opportunities within the urban area first. It undertook the Urban Capacity Study (documents SS6-7), and this has informed a raft of site allocations within the urban area which would deliver 698 homes. Beyond these allocations, the council has not been able to identify further developable urban sites that could remove the need for greenfield development. True to the settlement hierarchy, the plan includes new non-Green Belt urban expansions at Rugby at Newton Manor Lane and Crick Road south of Houlton which would accommodate 535 homes. Combined with the carried forward allocations at South West Rugby and Houlton and other commitments, this would mean (excluding small site windfalls) 82% of the new homes to be built in the borough between 2025-2042 being built at the town of Rugby. This is consistent with Rugby's position at the top of the settlement hierarchy. The remaining need would be met at main rural settlements, again this is consistent with their position as the second tier in the settlement hierarchy in Policy S1. In relation to the justification for Green Belt release, the council's position on this is outlined in detail in the Green Belt Exceptional Circumstances Topic Paper (GBD4).

Issue	Green Belt exceptional circumstances not demonstrated/Green belt release not justified or disproportionate in scale (51% of new allocations) - non-Green Belt should be prioritised
Who raised the issue	Yates, Alan; Monks Kirby Parish Council; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; CPRE; Mr and Mrs Hudson; Persimmon Homes (Central); Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Catesby Strategic Land; Kang, Jane; Critchley, P; Miller Homes; Miller Homes (Brownsover Road); Midlands Land Portfolio; MacKenzie Miller Homes
No. raising the issue	23
Council response	Not all respondents framed this issue in the same way, but they are grouped together for the purposes of conciseness. Some responses called for the development of grey belt land before non-grey belt Green Belt. As above, the justification for Green Belt release is set out in the Green Belt Exceptional Circumstance Topic Paper. In relation to the scale of Green Belt release, 1,436 homes are proposed on land to be released from the Green Belt through new allocations in this plan. Of these, 686 homes are on land identified in the evidence base as grey belt. This means ~50% of new housing allocations in the plan are on Green Belt with and this in turn splitting 48% grey belt, 52% non-grey-belt Green Belt. However, new allocations make up less than a quarter of new housing to be delivered in the plan period. Of all new housing to be delivered in the borough in the period to 2042, 6% is on Green Belt that is proposed to be released through

	this plan and 6% is on grey belt proposed for release.
Issue	Allocation of 58% of new development (outside of existing allocations and permissions) in rural areas is unsound and unjustified
Who raised the issue	James , Charles; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Court, Gerry & Carol; Spencer, June; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Penman, Judith; Hilliard, Robert; Brannigan, Jonathon; Higginson, Helen; Crosby, Ralph; Crosby, Sheila; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; Cox, Roger; Ward, Samantha ; Russell, Pauline; Black, John; Bassett, Graham; White, Claire; White, Garrie; Pitt, Janina; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Whitlock, Noel; Mallabone, Paul; Mallabone, Joanne; Lumsden, Peter; CPRE; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Long Lawford Residents ; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; Pailton Parish Council; Ward, Jane; Fisher, Hilary; Fisher, Michael; Kelly, Patrick and Linda; Sheffield, Andy; Downes, Steve and Allyson; Hilliard, Sharon; Bailey, Andrew; Briggs, Georgina; Lee, Joanne
No. raising the issue	596 (including group responses)
Council response	This raises a similar issue to the preceding points about Green Belt and development in the Rugby urban area. However, this issue is broadened to include all rural development. As is explained above, the council has considered Rugby urban area and Rugby urban expansion sites first before development at villages. Development remains heavily weighted towards Rugby.

Issue	No evidence that diversifying sites will diversify the type of house built, provide opportunities for small builders or lead to quicker development
Who raised the issue	Yates, Alan; CPRE
No. raising the issue	2
Council response	This comment refers to a point made by the council in justification for Green Belt release in the Green Belt Exceptional Circumstances Topic Paper (GBD4). In outline the Council's position is that: - Current housing commitments from the last local plan are heavily focussed on three large greenfield urban extensions to Rugby: Houlton, Eden Park and South West Rugby. Together these sites are projected to deliver 7,167 homes, circa 66% of the requirement. - Although they remain vital, the council has identified the following issues with the focus on these sites: (a) They have significant infrastructure requirements and in the case of

	South West Rugby have been slow coming forward (b) in the case of South West Rugby and Houlton they are delivering/are likely to deliver less than policy target levels of affordable housing (c) they are delivering similar types of housing in similar locations, generally developed by volume housebuilders. - To address these issues, the new local plan includes a more diverse range of site sizes and locations. 35 sites allocations are made through the plan. All new allocations are of sites for fewer than 500 homes in capacity and 27 of them are for sites for fewer than 100 homes. There is clear evidence, for example consultancy Lichfields' <i>Start to Finish</i> research that sites of this size deliver more quickly than larger sites. - There is also clear evidence in the Whole Plan Viability Assessment (document I1) that smaller greenfield sites particularly in the higher value villages are more viable and can support higher affordable housing percentages. Accordingly, the plan sets a higher percentage affordable housing requirement for these sites. This will diversity the type and tenure of sites being built. - There is also abundant national evidence that volume housebuilders do not generally build on small sites and that identifying more small sites is important to allowing SME builders access to land. This is why NPPF para 73 states "Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly". - The plan diversifies the type of homes being built by requiring new allocations at Warwick Road, Wolston and Home Farm, Brinklow to be delivered as bungalows or older persons accommodation and Dyers Lane Brinklow to be for self/custom build. - Finally, it is worth briefly explaining why a greater range of site sizes and locations will drive diversity in homes and improve delivery rates. Volume housebuilders sensibly target their product to the deepest part of the market by building estates of (largely, but not exclusively) family homes. However, not every buyer of newbuild housing wants to live in a family home on an urban expansion estate on the edge of Rugby. A diversity of sites can tap a broader market in terms of buyers' locational preferences and the type of buyers attracted. This in turn drives delivery.

Issue	Distribution of housing numbers is not aligned with sustainability scores produced in the Rural Sustainability Study - highest scoring villages Dunchurch and Binley Woods have no/few allocations while lower scoring villages have the majority
Who raised the issue	Monks Kirby Parish Council
No. raising the issue	1
Council response	First, in relation to Dunchurch it is important to recognise that circa 240 homes will be built as a northern expansion to the village through the South West Rugby allocation which is carried forward in this plan.

	Dunchurch will also see significant further development close by through the remainder of the South West Rugby site. In relation to Binley Woods, no suitable residential sites were identified beyond the former Oakdale Nursery site (in Brandon Parish but adjacent to the village) which now has planning permission. The sustainability scores are not the only determinant of the scale of site allocations at each village. This is a multi-factor decision and needs to take account of the scale of existing planned development at the village and the availability of suitable sites along with other factors like infrastructure (in particular school) capacities.

Issue	Policy S6 is unsound because it does not allocate an omission site.
Who raised the issue	Linfoot Country Homes; Tarrant, John; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Cliffe Investments Ltd; Bellway Homes; Taylor Wimpey; Tayton, Steve; Wolvey Parish Council; Persimmon Homes (Central); Allesley Investments Ltd; Catesby Estates; Vistry Group; Storm Consulting; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Midlands Land Portfolio; Mackenzie Miller Homes; Warwickshire Property and Development Group (site 90); Brandon Estates Ltd
No. raising the issue	20
Council response	This argument was framed in different ways by different promoters, often focussing on the relative merits of omission sites versus proposed allocations and how these were assessed through the site selection process and Sustainability Appraisal. The council has undertaken a clear and logical site selection process which is explained in the Spatial Strategy and Site Selection Methodology Summary (SS1). That process necessarily involved a range of judgements made by planning officers. It is certain that some omission site promoters will wish to dispute that evidence, potentially in some cases on a line by line basis challenging every micro judgement made therein. It will be for the inspectors to determine whether examination time should be used for this. It is noted that para 5.15 of the Procedure Guide for Local Plan Examinations states “the merits of sites not allocated in the submitted plan (known as “omission sites”) will not normally be discussed at the hearing sessions. This is because the focus of the examination is on the soundness of the submitted plan”.

Issue	Housing associations can struggle with letting and management of rural affordable properties (although inclusion of some rural affordable housing is supported)
Who raised the issue	West Midlands Housing Association Planning Consortium
No. raising the issue	1
Council	It is important to note that under Policy H2 paragraph 6.9 it is clearly envisaged that the

response	council will exercise some flexibility over the tenure mix of affordable housing. This can help address these concerns. It is also important to note that there are evidenced viability challenges for delivering affordable housing on: - the large site options considered in the evidence base (see the Viability Appraisal document I1); - the existing large Houlton and South West Rugby allocations; and - within the urban area, where viability is tighter and the affordable housing percentage in Policy H2 is accordingly lower. This means that having affordable housing at villages, where higher proportions can viably be supported, is a way of boosting affordable housing delivery in the borough. Even if these locations are not viewed as the perfect locations by all RSLs, it is considered better to have more affordable housing than less.

Issue	Primary school capacity should not alone override the sequential approach to green belt at Clifton upon Dunsmore.
Who raised the issue	Mackenzie Miller Homes
No. raising the issue	1
Council response	This is an argument on behalf of an omission site promoter in favour of a higher scale of development at Clifton upon Dunsmore, a non-Green Belt village. The potential to allocate more development at Clifton upon Dunsmore was discussed in paragraphs 2.155 to 2.158 of the Green Belt Exceptional Circumstance Topic Paper (GBD4). Primary school capacity is an important factor influencing the decision on the scale of growth at Clifton upon Dunsmore but is not the only factor. Landscape, coalescence and for some sites heritage impact concerns also informed decisions about the scale of growth at the village. The council do not agree that it is reasonable or sustainable to 'avoid the green belt at all costs' by concentrating development at the borough's non-Green Belt villages despite their greater constraints.

Issue	The plan claims that development in green belt villages will 'ensure the sustainability of rural primary schools' yet proposes allocations in a village where demand is already greater than supply at the school.
Who raised the issue	Yates, Alan
No. raising	1

the issue	
Council response	This comment relates to Stretton-on-Dunsmore. The Education Topic Paper (document I11). The topic paper notes that although there is projected to be demand in excess of available places at Knightlow Primary School in Stretton-on-Dunsmore this is likely to simply result in the school admitting fewer pupils than it presently does from outside of its priority area (catchment). There is no clear evidence of need for school expansion, but this will be kept under review by the LEA. To the representor's point, there isn't a need for development at Stretton on Dunsmore to sustain Knightlow School because that school is a successful and popular school that draws from outside the village. However, building homes in the village would likely reduce travel distances to the school. Also, it cannot be assumed that the school will continue to draw pupils from a wide area forever as the reputations of schools can wax and wane.

Issue	Further growth should be encouraged at main rural settlements due to issues with delivery at Rugby.
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	The plan proposes a level of housing at Rugby that it considers is deliverable through the plan period. The council's response in relation to the deliverability of sites at South West Rugby and Houlton is outlined in response to an issue raised under Policy S2 above.

Issue	The land supply is overly reliant on development at SUEs. These aren't robustly demonstrated to be deliverable.
Who raised the issue	Catesby Strategic Land
No. raising the issue	1
Council response	This comment supports development at Rugby but considers it too reliant on the urban extensions. The council is surprised to see Catesby questioning the deliverability of the South West Rugby urban extension given that it is a major landowner within that site and has submitted a planning application for its land. The council's response in relation to the deliverability of sites at South West Rugby and Houlton is outlined in response to an issue raised under Policy S2 above.

4.18. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications. Recommended modifications for individual sites are addressed below alongside

the main issues for that site. Requests to delete a site have not been addressed.

Modification summary	Proposer(s)
Proposed units for each site should be expressed as a minimum.	Inside Land Group; Newton LDP; Avon Timber Builders Ltd
The text of the development site allocations annex should not be read as part of the allocations policy (S6 or S7), and the principles should be less prescriptive.	Inside Land Group
Remove/reduce Green Belt allocations (generally or a specific site) and replace them with alternative non-Green Belt allocations.	Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Kang, Jane; Critchley, P; Brandon Estates Ltd; Bassett, Philip; Bassett, Ann; Bearne, Andrew; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella
Allocate an omission site	Allesley Investments Ltd; Cliffe Investments Ltd; Mr and Mrs Hudson; Bellway Homes; Catesby Strategic Land; Kang, Jane; Critchley, P; Catesby Estates; Vistry Group; Storm Consulting; Archdiocese of Birmingham; Miller Homes (Brownsover Road); Warwickshire Property and Development Group (site 90); Dignan, Peter
Housing numbers in S6 should be expressed as approximate figures, allowing flexibility (both up and down).	Tritax Park Rugby West Limited
Review and amend Stage 2 Green Belt assessment to reflect lower contribution to land north west of Rugby to preventing urban sprawl	Tarmac Trading Ltd
Development requirements set out in the Site Allocations annex should be updated for sites 62, 332, 353, 283, 350, 351, 354, 355, 279, 153, 294, 356, 357, 352, and 349 to include "Contributions may be sought towards delivery of highways and active travel mitigation schemes listed in Appendix K of the South West Rugby Masterplan SPD".	Taylor Wimpey Strategic Land
Replace the Brinklow allocations with new allocations for 145 dwellings as identified by Brinklow Parish Council.	Brinklow Parish Council
Allocate 175 units at Site 96. Site should be allocated on either side of Coventry Road but should not extend beyond the existing building line created by Hollick Way and Brookfield Drive to the west of Coventry Road.	RBC Conservative Group
Allocate the five sites recommended by the UCS which have not been allocated and increase the	Allanach, Richard

densities/capacities of urban brownfield allocations in line with the recommendations of the UCS.	
Council response to modification proposals: The majority of modifications recommended for this policy relate to site selection and development requirements which are addressed in the main issues for this policy or under individual sites.	
The allocated unit figure is already expressed as an approximate number of units (“circa”) and there is some flexibility to increase or decrease the allocation at application stage subject to site-specific circumstances and justification.	

SITE 54 OAKDALE NURSERY, BRANDON

4.19. Two representations on behalf of two people or organisations argued that the allocation of site 54 is unsound. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing
Who raised the issue	Farmer, Antony
No. raising the issue	1
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. This site now has planning permission (R24/0716) subject to a S106 agreement.

Issue	Brownfield should be used instead of Green Belt land / No special circumstances to demonstrate the requirement to remove land from the Green Belt
Who raised the issue	Farmer, Antony; Timms, Heather
No. raising the issue	2
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt and part of the site is previously developed land. This site now has planning permission (R24/0716) subject to a S106 agreement.

4.20. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Require the development to mitigate its impact on Brandon Little Wood through the use of buffer zones and locating housing adjacent to the A428.	Allanach, Richard
Council response to modification proposals: This would be handled as part of a reserved matters application when site layout is considered more closely. The development will need to demonstrate it will not cause adverse impacts on Brandon Little Wood LWS.	

SITE 337 WEST FARM AND HOME FARM, BRINKLOW

4.21. 36 representations on behalf of 306 people or organisations argued that the allocation of site 337 is unsound. One representation arguing the allocation of the site is sound was recorded. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (GP, hospitals etc) to support new housing making this an unsustainable location for development contrary to S1
Who raised the issue	Farmer, Antony; Lowe, David; Lowe, Clare; Hatton, Barbara; Handslip, Peter; King, David; Drew, Sally; Monks Kirby Parish Council; Gillias, Anthony; Mellors, Ellen; Reeve, John and Maggie; Brinklow Parish Council; Taylor, Gillian; Hayhurst, Amanda; Lloyd, Deborah; Handslip, Marilyn; England, Amanda; Johnson, Linda and Gary
No. raising the issue	19
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4.

Issue	Green Belt location is contrary to national policy
Who raised the issue	Farmer, Antony; Wright, Matthew; Handslip, Peter; Monks Kirby Parish Council; Brinklow Parish Council; Hayhurst, Amanda; Lloyd, Deborah; Parsons, Chris; Handslip, Marilyn
No. raising the issue	9
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt and part of the site is brownfield land.

Issue	Heightened flood risk from the development
Who raised the issue	Wright, Matthew; Drew, Sally; Brinklow Parish Council; Handslip, Marilyn; Johnson, Linda and Gary
No.	6

raising the issue	
Council response	The Level 2 Strategic Flood Risk Assessment (SS9) and Sequential Test (SS14) found the site to be at low risk of flooding with no anticipated increase in flood risk elsewhere. Further site-specific flood risk assessments will be required at planning application stage.

Issue	Traffic issues - Single access to site from Rugby Road will make traffic levels unmanageable and create issues for emergency vehicles. Site would lead to increased risk of accidents on this road and parking issues will be exacerbated.
Who raised the issue	Makepeace, T B; Hatton, Barbara; Monks Kirby Parish Council; Reeve, John and Maggie; Brinklow Parish Council; Taylor, Gillian; Hayhurst, Amanda; Handslip, Marilyn; England, Amanda
No. raising the issue	9
Council response	The Strategic Transport Assessment (I3) did not identify any significant issues arising from this site allocation. A site specific transport assessment and further site access drawings will be required at planning application stage.

Issue	Harms to a historic village including the conservation area and heritage asset Brinklow Castle - density would be inappropriate for the setting
Who raised the issue	Handslip, Peter; Gillias, Anthony; Brinklow Parish Council; Hayhurst, Amanda; Lloyd, Deborah; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Handslip, Marilyn; England, Amanda; Kang, Jane; Critchley, P; Barrett, R F; Johnson, Linda and Gary
No. raising the issue	18
Council response	The site was subject to a heritage assessment (SS19) which recommended combined development of the two constituent sites for 60-80 dwellings and identified mitigatory measures to limit heritage impacts. Developable land is restricted to the existing brownfield land, avoiding areas of higher heritage sensitivity.

Issue	Scale of proposed development is disproportionate to the existing size of the village which will damage character and heritage
Who raised the issue	Hilliard, Robert; King, David; Drew, Sally; Monks Kirby Parish Council; Brinklow Parish Council; King, Thelma; Lloyd, Deborah; Handslip, Marilyn; England, Amanda; Johnson, Linda and Gary; Hilliard, Sharon
No. raising the issue	12
Council response	The scale of this allocation is considered commensurate with the services available in Brinklow and local housing needs. The heritage assessment (SS19) recommended the site be allocated for 60-80 units to minimise heritage impacts. The total quantum of development at Brinklow has been reduced by 90 units since the

	Preferred Option consultation.

Issue	Unsuitable and unsustainable location for older persons housing due to reliance on car travel to access most services and limited bus routes
Who raised the issue	Mellors, Ellen; Handslip, Marilyn; Johnson, Linda and Gary
No. raising the issue	4
Council response	Brinklow scores relatively well in the Rural Sustainability Study (SD14) with local access to GP surgery, café, pubs and community facilities. The allocation will meet local need for older persons' specialist housing.

Issue	Focus on homes for over 55s will make the site unviable – wider mix would be preferable
Who raised the issue	Pailton Parish Council
No. raising the issue	484
Council response	The allocation of the site for over 55s housing will reduce pressures on home-to-school transport and meet local housing needs for older people in the village. This type of development has been successfully brought forward in the borough, and it is considered that there are clear opportunities for this to be viably developed in Brinklow in Brinklow which is a location with comparably high property values.

Issue	Pressure on sewage system from additional housing could lead to raw sewage being discharged into river
Who raised the issue	Ainsworth, Stephen
No. raising the issue	1
Council response	The Stage 2 Water Cycle Study (I10), produced in consultation with Severn Trent Water found there to be low potential for impact on sewerage infrastructure from this site with no known network constraints

Issue	Effective removal of a rural business that has operated for many years and provides permanent & seasonal employment for local people
Who raised the issue	Ainsworth, Stephen
No. raising the issue	1
Council	Both farm sites were submitted by the respective landowners as part of the Call for Sites

response	and were therefore considered for residential development. Policy E3 looks to support diversification and growth of rural businesses
Issue	Component sites of 337 both had access onto B4455 giving a total of 3 access points for new housing in Brinklow. No cumulative impact assessment from this site and site 315 accessing on both sides of the road
Who raised the issue	Brinklow Residents
No. raising the issue	269
Council response	The Strategic Transport Assessment (I3) did not identify any significant issues arising from this site allocation. A site specific transport assessment and further details of the site access strategy will be required at planning application stage. The allocation of the component sites as a single allocation will ensure a joined-up approach to its development.

4.22. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Relax restriction of any built development on the eastern side of the site to allow for appropriate development e.g. green space shelter which would not harm setting of heritage assets	Burson, David obo West Farm Landowners
Amend requirement to reroute existing public rights of way (PRoW) as only required where appropriate	Burson, David obo West Farm Landowners
Layout of development needs to clearly show the routes of the current PRoW & demonstrate that they will not be obstructed during construction or when complete	Ainsworth, Stephen
Council response to modification proposals: The current development requirements are designed to ensure a high-quality and sustainable development outcome at this site. Considerations relating to specific layouts can be discussed at detailed application stage and be managed through conditions.	

SITE 315 LAND SOUTH OF RUGBY ROAD, BRINKLOW

4.23. 57 representations on behalf of 328 people or organisations argued that the allocation of site 315 is unsound. The following main issues were raised with this site allocation:

Issue	Unsustainable location for significant housing due to lack of schools, doctors etc and general infrastructure creating reliance on car travel - contrary to S1 and national policy section 2
Who raised	Bostock, Tom; Lowe, David; Lowe, Clare; Corbey, Clifford; Hatton, Barbara; Handslip, Peter; Drew, Sally; Monks Kirby Parish Council; Ward, Philip; Ward, Allison; Ward, Olivia;

the issue	Ward, Charlie; Mellors, Ellen; Brinklow Parish Council; Cardwell, Joanna; Brandon & Bretford Parish Council; Lloyd, Deborah; Fletcher, Mary; Fletcher, Paul; Handslip, Marilyn; Johnson, Linda and Gary; Brinklow Residents
No. raising the issue	291
Council response	Brinklow scored well in the Rural Sustainability Study (SD14) for its access to facilities such as GP surgery, café, pubs and reception-age schooling. Travel by bus is also possible to Rugby and Coventry.

Issue	Scale of growth is disproportionate to the size and identity of the village and infrastructure available - congested roads, GP surgery at capacity, no school locally
Who raised the issue	Bostock, Tom; Farmer, Antony; Giles, Yvette; Corbey, Clifford; Hilliard, Robert; Handslip, Peter; King, David; Brittain, Helen; Drew, Sally; Blakeway, Neil; Monks Kirby Parish Council; Linfoot Country Homes; Ward, Allison; Ward, Olivia; Ward, Charlie; Mellors, Ellen; Brinklow Parish Council; King, Thelma; Cardwell, Joanna; Lloyd, Deborah; Whiteford, James; Smith, Joanne; Fletcher, Mary; Fletcher, Paul; Handslip, Marilyn; England, Amanda; Barrett, R F; Pailton Parish Council; Johnson, Linda and Gary; Allen, Roger; Brinklow Residents ; Hilliard, Sharon; Lee, Joanne
No. raising the issue	302
Council response	The scale of this allocation is considered commensurate with the services available in Brinklow and the housing needs of the borough. The total quantum of development at Brinklow has been reduced by 90 units since the Preferred Option consultation.

Issue	Adverse impacts on heritage assets such as listed buildings and Brinklow Castle, loss of location for cultural events such as scarecrow festival
Who raised the issue	Bostock, Tom; Giles, Yvette; Drew, Sally; Ward, Philip; Ward, Allison; Ward, Olivia; Ward, Charlie; Gillias, Anthony; Brinklow Parish Council; Lloyd, Deborah; Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Handslip, Marilyn; England, Amanda; Kang, Jane; Critchley, P; Johnson, Linda and Gary; Brinklow Residents
No. raising the issue	291
Council response	The site was subject to a heritage assessment (SS19) which recommended restricting development to the easternmost field of the site to protect the ridge and furrow on the western field and mitigate impacts on the setting of heritage assets. This approach has been implemented in the proposed submission local plan.

Issue	Inappropriate use of Green Belt - brownfield and non-Green Belt should be prioritised
Who raised the issue	Farmer, Antony; Wright, Matthew; Giles, Yvette; McDonnell, Angela; Handslip, Peter; Brittain, Helen; Blakeway, Neil; Monks Kirby Parish Council; Ward, Philip; Ward, Allison; Ward, Olivia; Ward, Charlie; Mellors, Ellen; Brinklow Parish Council; Cardwell, Joanna; Lloyd, Deborah; Smith, Mark; Fletcher, Mary; Fletcher, Paul; Parsons, Chris ; Handslip, Marilyn; RBC Conservative Group; Brinklow Residents
No.	306

raising the issue	
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt land.

Issue	Loss of quality agricultural land and hedgerows contrary to national policy
Who raised the issue	Currington, Ian; Brittain, Helen; Blakeway, Neil; Brinklow Parish Council; Smith, Joanne; Fletcher, Mary; Ainsworth, Stephen; Brinklow Residents
No. raising the issue	276
Council response	The site is grade 3 agricultural land so is not considered Best and Most Versatile.

Issue	Traffic and access issues - access from Brays Close and Heath Lane will exacerbate existing congestion in these areas; Heath Lane is too narrow
Who raised the issue	Owen, Peter; Lowe, David; Lowe, Clare; McDonnell, Angela; Makepeace, T B; Hatton, Barbara; Handslip, Peter; Brittain, Helen; Blakeway, Neil; Ward, Philip; Ward, Allison; Ward, Olivia; Ward, Charlie; Mellors, Ellen; Brinklow Parish Council; Cardwell, Joanna; Fletcher, Mary; Fletcher, Paul; Handslip, Marilyn; England, Amanda; Lavin, Mick; Tipper, Carol; Brinklow Residents
No. raising the issue	292
Council response	The Strategic Transport Assessment (I3) did not identify any significant issues arising from this site allocation. A site specific transport assessment and further details of the site access strategy will be required at planning application stage. Heath Lane is only proposed as a secondary access with primary access from Brays Close.

Issue	Development proposal will lead to increased flood risk
Who raised the issue	Wright, Matthew; Giles, Yvette; Makepeace, T B; Handslip, Peter; Drew, Sally; Mellors, Ellen; Brinklow Parish Council; Cardwell, Joanna; Handslip, Marilyn; Johnson, Linda and Gary
No. raising the issue	11
Council response	The Level 2 Strategic Flood Risk Assessment (SS9) and Sequential Test (SS14) found the site to be at low risk of flooding with no anticipated increase in flood risk elsewhere. Further site-specific flood risk assessments will be required at planning application stage.

Issue	Additional strain on utilities such as sewage and electricity supplies will cause disruption and extra costs
Who raised the issue	Yates, Alan; Mellors, Ellen; Brinklow Parish Council; Whiteford, James; Ainsworth, Stephen
No.	5

raising the issue	
Council response	Energy and sewerage infrastructure providers have not flagged concerns about their ability to serve this proposed development. A two-stage Water Cycle Study has been produced which assesses the impact that future growth may have on water resources, water supply infrastructure, and wastewater collection and treatment. This concludes that "Overall, no issues have been identified that would impede the progress of development sites" and that "any necessary investments or infrastructure planning can be managed through the established procedures over the course of the plan period." Seven Trent Water, the water and sewerage provider for the Borough, have been consulted throughout the plan-making process and will continue to be informed as it progresses so that infrastructure can be appropriately planned.

Issue	RBC Rural sustainability study incorrectly gives 4 points to Brinklow for having a school National policy requires development to be in locations with a choice of schooling options WCC preferred options consultation response raised concerns around cost of school transport Education Topic Paper notes that The Revel school has a projected shortfall in places
Who raised the issue	Brinklow Residents
No. raising the issue	269
Council response	The Rural Sustainability Study (SD14) does assign 4 points to Brinklow on account of the primary school annex even though this only covers Reception age schooling. It is true a score of 2 may be more reflective of this level of provision, but this would still make Brinklow the fourth highest scoring rural settlement and therefore is of no material difference to the settlement hierarchy or site selection process. The Education Topic Paper (I11) finds that there would be no shortfall in places for reception school admissions, while the whole school shortfall of places is considered marginal at 22 pupils in a 'worst case' scenario.

Issue	Site promoter's own ecology evidence includes advice for protecting biodiversity along the boundary which has not been followed (this area is now secondary access)
Who raised the issue	Brinklow Residents
No. raising the issue	269
Council response	The site promoter's ecology statement recommends a suitable buffer zone between ditches on the southern boundary and built development – this boundary is not proposed for secondary access. The development principles drawing includes reinforced planting and indicative open space alongside the secondary access boundary. The council's ecological constraints assessment (SS25 and SS27) of the site found it had medium constraints but could be developed with appropriate mitigations in place. Further assessments and consideration of BNG and other ecological measures would be

	considered at planning application stage.

Issue	Single carriageway and grade II listed Bretford Bridge is a source of congestion which will be exacerbated by increasing the number of cars through this allocation
Who raised the issue	Brinklow Residents
No. raising the issue	269
Council response	The Infrastructure Delivery Schedule (I2) sets out a potential requirement for upgrades to the existing signal control equipment, ideally in combination with adaptive signal control to minimise queueing. This would be secured via S106 agreements. The Strategic Transport Assessment (I3) did not identify this scheme as a potential requirement for site 315, but rather for residential allocations in Stretton-on-Dunsmore, Ryton-on-Dunsmore and Wolston.

Issue	GP surgery and pharmacy are accessed via congested unlit narrow lane with no pavement posing risk to pedestrians and drivers - this point has not been addressed since Reg 18
Who raised the issue	Brinklow Residents
No. raising the issue	269
Council response	The Local Plan cannot address existing challenges. The proximity of the allocation site to the GP surgery means it is unlikely to result in a substantial increase in patients visiting the GP surgery and pharmacy by private vehicle.

Issue	No substantive need for self-build plots in Brinklow, alternative access arrangements from Rugby Road, and excluding the eastern part of the site unsound - ridge and furrow should not be prioritised. Eastern parcel would be removed from green belt without contributing to housing need.
Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	The self-build register contains many entrants which specify only 'village' or 'anywhere' and this site is considered suitable for meeting this demand. Avoiding development on the eastern parcel not only protects the ridge and furrow but also minimise harms to the setting of the scheduled monument and conservation area. This approach is supported by the Heritage Assessment (SS19).

4.24. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications

proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
A new Water Cycle Study should be completed to look at the Flow Rate & Volume of Smite Brook & effects on Coombe Pools SSSI	Whiteford, James
Amend development requirements to allow development on the eastern parcel with proportionate recording of ridge and furrow. (Also access and self-build revisions).	William Davis Homes (site 315)
Amend development requirements to ensure evaluative archaeology fieldwork assessment is undertaken and to avoid any damage to ridge and furrow during construction	Brinklow Residents
Add development requirement to protect historic assets of the site and heritage of Brinklow	Brinklow Residents
Add requirement for pedestrian crossing on Broad Street	Brinklow Residents
Add requirement to improve local public transport including public buses during school transport hours and routes to Rugby and Coventry train stations	Brinklow Residents
Council response to modification proposals: The current development requirements are designed to ensure development is sympathetic to the heritage considerations at this site, including the ridge and furrow. The contributions to traffic infrastructure or local services listed are not exhaustive and other measures may be required at application stage, alongside further assessment.	

SITE 129 LAND NORTH OF LILBOURNE ROAD, CLIFTON UPON DUNSMORE

4.25. Four representations on behalf of four people or organisations argued that the allocation of site 129 is unsound. Three representations on behalf of three people or organisations argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Not enough school places at the village school to accommodate new homes
Who raised the issue	Adams, Lee
No. raising the issue	1
Council response	The total quantum of development at Clifton has been limited to the projected future capacity of the primary school. The Education Topic Paper (I11) concludes that while places at Clifton upon Dunsmore school are limited, the school only drew 45-46% of children from its priority area of Clifton, Newton and Churchover ward in 2022/23 and 2024/25. The remainder primarily came from the Rugby urban area. There is sufficient space in nearby Rugby schools to accommodate children living outside the Clifton priority area. Therefore, the impact of the site allocation on school places would be to increase the number of children attending from within the priority area.

Issue	Road infrastructure not suitable, concern about junction with A5 and flooding on the road
Who	Adams, Lee; Maycock, Amy; Clifton upon Dunsmore Parish Council

raised the issue	
No. raising the issue	3
Council response	The Local Plan cannot address existing infrastructure issues. The Strategic Transport Assessment (I3) did not identify any schemes required to mitigate the impacts of this development specifically, however the need for smaller site-specific measures would be assessed by the local highways authority at planning application stage.

Issue	Site is in an unsustainable location requiring car travel for most services (Maycock, Amy) / less sustainably located for recreation ground and bus stops than other candidate sites (Richborough)
Who raised the issue	Maycock, Amy; Richborough (Clifton upon Dunsmore)
No. raising the issue	2
Council response	Clifton scores well in the Rural Sustainability Study (SD14) with a primary school, shop and pub within the village. The site is approximately 400 metres from the nearest bus stop, village stores and public house. It is approx. 600 metres from the primary school and 700 metres from the recreation ground. It has reasonable potential for non-car modes of travel to access Rugby town centre and easy access to local leisure facilities.

Issue	Loss of quality agricultural land, trees and hedgerows contrary to national policy and insufficient assessment/evidence on impact
Who raised the issue	Maycock, Amy
No. raising the issue	1
Council response	The site is a grade 2 agricultural land which is considered Best and Most Versatile. However, its non-Green Belt location with good access to village services and to the Rugby urban area is thought to justify the allocation. The development requirements refer to the retention and enhancement of hedgerows and green buffers. The site did not meet the threshold for an ecological constrain assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. Further site-specific ecological assessment would be required at application stage.

Issue	Heritage impact on Old Hall and Clifton Manor and Conservation Area
Who raised the issue	Clifton upon Dunsmore Parish Council; Richborough (Clifton upon Dunsmore)
No.	2

raising the issue	
Council response	The site was subject to a heritage assessment (SS19) which noted the heritage constraints and the need for high quality design, low number of units, and additional screening to mitigate the heritage impacts. These have been included in the development requirements.

Issue	Landscape impact, site is beyond a well treed edge to village with a network of public rights of way. Would be visually prominent
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	This site is considered to have lower landscape impacts than other candidate sites around Clifton upon Dunsmore and has an overall rating of Medium/Low in the Landscape Sensitivity Assessment of smaller sites (SS22). It sits within a well-enclosed parcel and has a strong relationship with the existing built area of the village

Issue	Development would lead to traffic flows through the village including past the school
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	The relatively low number of units on this site is through to minimise impacts on the local roads. The site is within easy walking distance of the village school so should not contribute to increased drop-off/pick-up congestion. Fastest routes to the strategic road network would not go past the school. The Strategic Transport Assessment (I3) did not identify any significant impacts on the road network from this development.

4.26. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Upgrade required to Lilbourne Road up to and including the A5 junction	Clifton upon Dunsmore Parish Council
Council response to modification proposals: The Strategic Transport Assessment (I3) did not identify this scheme as a requirement for development of the site. The proposal will be subject to further highways assessments at application stage which will consider the need for more localised measures including on Lilbourne Road.	

SITE 202 NEWTON ROAD, CLIFTON UPON DUNSMORE

4.27. Four representations on behalf of four people or organisations argued that the allocation of site 202 is unsound. Two representations on behalf of two people or organisations argued that the allocation of site 202 is sound. The following main issues were raised with this site allocation:

Issue	Not enough school places at the village school to accommodate new homes
Who raised the issue	Adams, Helen
No. raising the issue	1
Council response	The total quantum of development at Clifton has been limited to the projected future capacity of the primary school. The Education Topic Paper (I11) concludes that while places at Clifton upon Dunsmore school are limited, the school only drew 45-46% of children from its priority area of Clifton, Newton and Churchover ward in 2022/23 and 2024/25. The remainder primarily came from the Rugby urban area. There is sufficient space in nearby Rugby schools to accommodate children living outside the Clifton priority area. Therefore, the impact of the site allocation on school places would be to increase the number of children attending from within the priority area.

Issue	Road infrastructure is not suitable
Who raised the issue	Adams, Helen; Maycock, Amy
No. raising the issue	2
Council response	The Local Plan cannot address existing infrastructure issues. The Strategic Transport Assessment (I3) did not identify any schemes required to mitigate the impacts of this development specifically, however the need for smaller site-specific measures would be assessed by the local highways authority at planning application stage.

Issue	Concern for increased flood risk
Who raised the issue	Adams, Helen
No. raising the issue	1
Council response	The Level 2 Strategic Flood Risk Assessment (SS9) and Sequential Test (SS14) found the site to be at low risk of flooding with no anticipated increase in flood risk elsewhere. Further site-specific flood risk assessments will be required at planning application stage.

Issue	Site is in an unsustainable location requiring car travel for most services (Maycock, Amy) / less sustainably located for recreation ground and bus stops than other candidate sites

	(Richborough)
Who raised the issue	Maycock, Amy; Richborough (Clifton upon Dunsmore)
No. raising the issue	2
Council response	Clifton scores well in the Rural Sustainability Study (SD14) with a primary school, shop and pub within the village. The site is approximately 0.2-0.3 miles from the nearest bus stop and 0.4 miles from the recreation ground, giving it reasonable potential for non-car modes of travel to access Rugby town centre and easy access to local leisure facilities.

Issue	Development will harm the adjacent Clifton conservation area
Who raised the issue	Maycock, Amy; Richborough (Clifton upon Dunsmore)
No. raising the issue	2
Council response	The site is largely separated from the conservation area by other modern development and is not considered to present any harms to its setting

Issue	Development would lead to traffic flows through the village including past the school
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	The relatively low number of units on this site is through to minimise impacts on the local roads. The site is within easy walking distance of the village school so should not contribute to increased drop-off/pick-up congestion. Fastest routes to the strategic road network would not go past the school. The Strategic Transport Assessment (I3) did not identify any significant impacts on the road network from this development, however the need for smaller site-specific measures would be assessed by the local highways authority at planning application stage.

Issue	Potential landscape impacts – the site is not well enclosed, and development will be visually prominent including visibility from pRoWs
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	This site is considered to have lower landscape impacts than other candidate sites around Clifton upon Dunsmore and has an overall rating of Medium/Low in the Landscape

	Sensitivity Assessment for smaller sites (SS22). The site is felt to be quite well-enclosed and has a strong relationship with the existing built area of the village.

4.28. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Seek bungalows within the proposal in line with emerging Neighbourhood Plan	Clifton upon Dunsmore Parish Council
Council response to modification proposals: This site is considered more suitable for a combination of market-rate and affordable two-storey/non-bungalow housing typologies. The Neighbourhood Plan is not yet made and was in early stages during much of the plan making process.	

SITE 307 NORTH ROAD, CLIFTON UPON DUNSMORE

4.29. Six representations on behalf of six people or organisations argued that the allocation of site 307 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Consideration is to be given to the proposed access design in respect of the existing adjacent neighbouring bungalow's driveway
Who raised the issue	Warwickshire County Council; Dignan, Lynn
No. raising the issue	2
Council response	Noted. Consideration of the details of the proposed access design would take place at planning application stage.

Issue	North road and access point are too narrow, site access would need to cross existing property (representation from owner), and road is blocked by parked vehicles. Particular concern raised about disruption during construction phase. Frequent traffic associated with the school with high risk of collisions.
Who raised the issue	Clifton upon Dunsmore Parish Council; Plummer, Dominic; Dignan, Lynn; Dignan, Peter
No. raising the issue	4
Council response	The Strategic Transport Assessment (I3) did not identify any significant issues arising from this site allocation. A site specific transport assessment and further details of the site access strategy will be required at planning application stage. Construction proposals would be subject to a construction management plan to be agreed at application stage. The proximity of the site to the school would avoid an increase in school run traffic

	associated with the site.

Issue	Site is farther from bus stop and recreation ground than alternative sites
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	The site is approximately 0.2 miles from the nearest bus stop and 0.3 miles from the recreation ground making it well-located to access these facilities.

Issue	Development would lead to traffic flows through the village including past the school
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	The low number of units on this site is thought to minimise impacts on the local roads. The site is within easy walking distance of the village school so should not contribute to increased drop-off/pick-up congestion. Fastest routes to the strategic road network would not go past the school. The Strategic Transport Assessment (I3) did not identify any significant impacts on the road network from this development.

Issue	Landscape impact. Elevated site, prominent and visible from PROWs, with distant views and weak field boundaries
Who raised the issue	Richborough (Clifton upon Dunsmore)
No. raising the issue	1
Council response	This site is considered to have lower landscape impacts than other candidate sites around Clifton upon Dunsmore and has an overall rating of Medium/Low in the Landscape Sensitivity Assessment for smaller sites (SS22). The site has minimal landscape value. The only sensitivities are likely to be due to its views of Rugby town to the northwest, its proximity to residential dwellings which have some intervisibility, and the current tranquillity of the area.

Issue	This is just part of land so likely that it will increase in numbers as the developer decides to build more
Who raised the issue	RBC Conservative Group
No. raising the issue	16

Council response	The allocation would limit the developer to the red line boundary shown in the site allocations annex. Any further development would be subject to a full planning application and treated as a speculative proposal. A separation area is included in the plan under Policy EN4 which would prevent further expansion of this site.

Issue	Highway widening that would be required would cause significant harm to the rural character of the village entrance
Who raised the issue	Dignan, Peter
No. raising the issue	1
Council response	Specific proposals for site access and associated highways works would be considered at application stage. Highway widening at the village entrance is not envisaged.

Issue	Allocation is unjustified because it is undermined by the evidence that supports policy EN4. Proposing both this allocation and policy EN4 is irrational.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The council disagrees. The proposed allocation could be viewed as “rounding off” of Clifton upon Dunsmore extending no closer to Rugby than the North Road allotments. This small allocation does not undermine the evidence for a separation area between Rugby and Clifton upon Dunsmore.

4.30. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Road safety audit should be carried out to assess entry point to site	Plummer, Dominic
Council response to modification proposals: The local highways authority will consider the site’s access and layout once the detail proposals are available at point of application.	

SITE 172 ELIZABETH WAY, LONG LAWFORD

4.31. Two representations on behalf of 517 people or organisations argued that the allocation of site 172 is unsound. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing

Who raised the issue	Farmer, Antony; Long Lawford Residents
No. raising the issue	517
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highway authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4.

Issue	Brownfield land should be used instead of Green Belt land
Who raised the issue	Farmer, Antony
No. raising the issue	1
Council response	This is a brownfield site.

Issue	Garages are currently used by local residents
Who raised the issue	Long Lawford Residents
No. raising the issue	516
Council response	The Council's Garage Management Plan, approved by cabinet in September 2025 agreed to rationalise some underused garage sites, including this site which was considered suitable for residential development as a brownfield site. At the time of the report the Elizabeth Way garages had an occupancy rate of less than 50%.

SITE 316 LAND AT LONG LAWFORD

4.32. 14 representations on behalf of 529 people or organisations argued that the allocation of site 316 is unsound. The following main issues were raised with this site allocation:

Issue	Runoff of water from site if developed will add to flooding of A428 and Livingstone Avenue green area (balance ponds not sufficient to mitigate this)
Who raised the issue	Long Lawford Parish Council; Skinner, Gary; Livingstone Avenue Householders Ltd; Long Lawford Residents; Walker, Rebecca
No.	520

raising the issue	
Council response	A detailed site summary table was prepared as part of the Level 2 Strategic Flood Risk Assessment (SS13) for this site which concluded it could be made safe for its lifetime of 100 years and made recommendations for drainage and mitigation strategies. Development will be subject to a site-specific flood risk assessment at application stage which must demonstrate the development will not increase flood risk elsewhere.

Issue	Traffic - Increased traffic on A428 will make leaving & entering village more difficult at peak times. Children from site being taken to village school by car will exacerbate parking issues there.
Who raised the issue	Long Lawford Parish Council; Skinner, Matthew; Evans, Roger; Eaton, David; Brandon & Bretford Parish Council; Skinner, Gary; Long Lawford Residents; Walker, Rebecca
No. raising the issue	523
Council response	The Strategic Transport Assessment (I3) did not identify significant issues on the A428 but did highlight a requirement for the development to contribute to other road improvement schemes to mitigate traffic impacts including the A4071 Potsford Dam Roundabout scheme (by 2038), the A426/Newton Manor Lane scheme (by 2042) and the A4071/B4112 Newbold Road Roundabout scheme (by 2042). These are set out in the Infrastructure Delivery Schedule (I2). Further, site-specific mitigations would be considered at planning application stage.

Issue	Noise & disruption caused by development of site
Who raised the issue	Long Lawford Parish Council
No. raising the issue	1
Council response	All development proposals will be subject to a construction management plan once planning permission is granted.

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing
Who raised the issue	Farmer, Antony; Skinner, Matthew; Eaton, David; Skinner, Gary
No. raising the issue	5
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Card Board (NHS) and Severn Trent Water. The scale of development is considered to be commensurate with the level of services

	within Long Lawford (e.g. school capacity) and those available a short distance away in Rugby town. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. The education topic paper (document I11) identified sufficient school capacity to accommodate the proposed development.

Issue	Release of Green Belt land not justified. Brownfield/non-Green Belt should be prioritised. Would not meet requirements of NPPF para 149e) & f)
Who raised the issue	Farmer, Antony; Whitford, Gemma; Evans, Roger; Eaton, David; Long Lawford Residents; Miller Homes
No. raising the issue	521
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning and justification for allocating sites within the Green Belt. This site was considered to be suitable for allocation for reasons including supporting the sustainability of the village primary school, delivery of new public recreational facilities, lower assessed landscape sensitivity of the site, and proximity to Rugby urban area. The council believes that it can demonstrate the updates to the Green Belt boundaries will not need to be altered again at the end of the plan period (NPPF 149e) and that the edge of the new development and associated recreational land use (which is a permitted green belt use) will serve as a clear and permanent boundary (NPPF 149f). The development principles plan and the requirements of the development sites annex would ensure delivery of a strong new Green Belt boundary.

Issue	Disproportionate with the settlement hierarchy and of unjustified scale
Who raised the issue	Whitford, Gemma; Long Lawford Residents
No. raising the issue	517
Council response	Long Lawford is the largest of the main rural settlements by some margin with a population of 4370 according to the ONS Census 2021 built up area statistics. It also scored well in the rural sustainability study (SD14) ranking 5 th . And has among the best transport links to Rugby, both for public transport and for (with improvements) walking and cycling. Allocating the largest quantum of development outside the urban area to this village is therefore felt to be an appropriate strategy justified by proportionate evidence.

Issue	Sequential test for flood risk has not been robustly applied according to NPPF 159-162
Who raised the issue	Whitford, Gemma

No. raising the issue	1
Council response	The site was subject to the sequential test (SS14), and a site summary table (SS13) was produced to assess flood risk in further detail. The representation does not specify in what way the sequential test has not been robustly applied and the NPPF paragraph referenced does not relate to the sequential test or flood risk.

Issue	Long Lawford has already experienced large-scale growth and cannot accommodate any more
Who raised the issue	Long Lawford Residents
No. raising the issue	516
Council response	It is acknowledged that Long Lawford has experienced multiple development schemes over the previous decades. Nonetheless, it remains a sustainable location for further development and the evidence concludes that key services such as the primary school (Education Topic Paper I11) are projected to have sufficient capacity to accommodate further growth.

Issue	Three of the development requirements are too rigid and could prevent the policy being applied effectively
Who raised the issue	Richborough (Long Lawford)
No. raising the issue	1
Council response	We disagree. The development requirements are designed to ensure high quality, sustainable development outcomes at this site.

Issue	Viability less in Long Lawford than other rural areas so may not deliver higher affordable housing level.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	No issues with delivering a policy-compliant level of affordable housing have been highlighted in the evidence base.

Issue	Site is in the green belt and would join Long Lawford to Rugby, which in turn would reduce the distance between Rugby & Coventry, which is contrary to intention of green belt
Who raised	RBC Conservative Group

the issue	
No. raising the issue	16
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning and justification for allocating sites within the Green Belt. This site was considered to be suitable for allocation for reasons including supporting the sustainability of the village primary school, delivery of new public recreational facilities, lower assessed landscape sensitivity of the site, and proximity to Rugby urban area. The Stage 2 Green Belt Study GBD2 identifies the site as making weak/no contribution to preventing Rugby and Coventry from merging because of the robust almost 10km gap between the two towns.

Issue	Site is next to Long Lawford Meadows Local Wildlife Site and directly on Lawford Heath Meadows - this is a key wildlife site home to a number of important and at risk protected species. Councils NERC duty isn't being met
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	Long Lawford Meadows is a former local wildlife site that was subsequently developed for housing. This area is now a housing estate not a local wildlife site. Lawford Heath Meadows is a potential local wildlife site. This site does not overlap with the site boundary and there is limited adjacency. A potential local wildlife site is a site that has not yet been surveyed or assessed to determine whether it meets the threshold to be designated as a local wildlife site. Accordingly there are no currently extant local wildlife sites close to this proposed allocation.

4.33. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend second development requirement to only require retention and reuse of the L-shaped building where viable	Richborough (Long Lawford)
Amend sixth development requirement to only require connections with off-site public rights of way where possible	Richborough (Long Lawford)
Amend eighth development requirement to only require small-scale convenience retail and community space where viable	Richborough (Long Lawford)

Council response to modification proposals: The development requirements are designed to ensure a high-quality and sustainable outcome at this site. Allowing too much flexibility in the requirements risks reducing the quality, sustainability and delivery of additional amenities or connections.	

SITE 253 LAWFORD FIELDS FARM, LONG LAWFORD

4.34. 17 representations on behalf of 532 people or organisations argued that the allocation of site 253 is unsound. Two representations on behalf of two people or organisations argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Issues with traffic and congestion
Who raised the issue	Long Lawford Parish Council; Skinner, Matthew; Evans, Roger; Brandon & Bretford Parish Council; Skinner, Gary; Long Lawford Residents; Walker, Rebecca
No. raising the issue	522
Council response	The Strategic Transport Assessment (I3) identified contributions would be required from the development of this site to support the A4071 Potsford Dam Roundabout scheme (by 2038) and the A4071/B4112 Newbold Road Roundabout scheme (by 2042) and to mitigate any transport impacts arising. These are set out in the Infrastructure Delivery Schedule (I2). The Local Plan cannot address existing infrastructure issues.

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. The site is disconnected from the village services.
Who raised the issue	Farmer, Antony; Skinner, Gary; Pickup, Maralyn; Long Lawford Residents; Walker, Rebecca; Oag, Hazel
No. raising the issue	521
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. The site is still within reasonable walking distance of village services, and the development requirements include safe crossing provision on Rugby Road. The education topic paper (document I11) identified sufficient school capacity to accommodate the proposed development.

Issue	Use of Green Belt land is inappropriate and unjustified

Who raised the issue	Farmer, Antony; Scott, Brett; Evans, Roger; Tarrant, John; Bradshaw, Philip; Pickup, Maralyn; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Long Lawford Residents ; Bradshaw, Naomi; Kang, Jane; Critchley, P; Walker, Rebecca; Oag, Hazel; Allanach, Richard
No. raising the issue	532
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning and justification for allocating sites within the Green Belt. This site was considered to be suitable for allocation for reasons including supporting the sustainability of the village primary school, delivery of new public recreational facilities, lower assessed landscape sensitivity of the site, and proximity to Rugby urban area.

Issue	Site is best and most versatile agricultural land with long history of agricultural use
Who raised the issue	Scott, Brett
No. raising the issue	1
Council response	The site is grade 3 agricultural land so is not considered best and most versatile.

Issue	Reasonable non-Green Belt alternatives (e.g. Reg 18 sites at Dunchurch) are not being prioritised, contrary to national policy
Who raised the issue	Scott, Brett; Tarrant, John; Mr and Mrs Wheeler the landowner of Land west of Medda Place
No. raising the issue	4
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning and justification for allocating sites within the Green Belt and assesses non-green belt alternatives, including those at Dunchurch. It concludes that Dunchurch is not a preferable location for development due to the scale of development already planned at the village (240 homes) and immediately adjacent to the village (the remainder of the 4000 homes) as part of South West Rugby SUE and significant overconcentration of development at this main rural settlement would not represent a sustainable pattern of the development.

Issue	Loss of separation between Rugby and Long Lawford, undermines the purpose of the Green Belt in limiting urban sprawl. Would not meet requirements of NPPF para 149e) & f)
Who raised the issue	Scott, Brett; Evans, Roger; Tarrant, John; Pickup, Maralyn; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Long Lawford Residents; Bradshaw, Naomi; Kang, Jane; Critchley, P; Walker, Rebecca; Miller Homes; RBC Conservative Group; Allanach, Richard

No. raising the issue	546
Council response	It is true that the separation between Rugby and Long Lawford will be reduced by this allocation. The council believes that it can demonstrate the updates to the Green Belt boundaries will not need to be altered again at the end of the plan period (NPPF 149e) and that the edge of the new development and associated recreational land use (which is a permitted green belt use) will serve as a clear and permanent boundary (NPPF 149f). The development principles plan and the requirements of the development sites annex would ensure delivery of a strong new Green Belt boundary.

Issue	Environmental impact - large number of different wildlife species around site, including 2 protected species of bat
Who raised the issue	Evans, Roger; Walker, Rebecca; Oag, Hazel
No. raising the issue	3
Council response	The site did not meet the threshold for an ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. A site-specific ecology survey and protected species investigations would be handled at application stage.

Issue	Previous SA found the site to be a lower performing option due to the contribution to Green Belt purposes and the lack of justification for this scale of development at Long Lawford
Who raised the issue	Bradshaw, Naomi; Allanach, Richard
No. raising the issue	2
Council response	This is understood to be a reference to the interim Sustainability Appraisal report. This was prepared at an earlier stage of plan-making and was updated for the final SA report based on updated evidence and responses to the Regulation 18 consultation. The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning and justification for allocating sites within the Green Belt. It is true that the Interim SA did not progress this site as a growth scenario due to being lower performing than site 316. However, it did also note that development of 316 would likely increase pressure for future allocation of this site. The Regulation 19 SA (CD5) highlights that the current approach ensures both sites are brought forward comprehensively, rather than resulting in piecemeal development.

Issue	Exacerbation of existing flood risk in Long Lawford, in particular around Livingstone Avenue and South View Road

Who raised the issue	Livingstone Avenue Householders Ltd; Long Lawford Residents; Walker, Rebecca; Oag, Hazel
No. raising the issue	519
Council response	The Level 2 Strategic Flood Assessment and Sequential Test found the site to be at low risk of flooding with no anticipated increase in flood risk elsewhere. Further site-specific flood risk assessments will be required at planning application stage.

Issue	Viability is lower in Long Lawford than other rural areas so allocation may not deliver higher affordable housing level
Who raised the issue	Miller Homes
No. raising the issue	426
Council response	No issues with delivering a policy-compliant level of affordable housing have been highlighted in the evidence base.

Issue	The allocation is inconsistent with NPPF para 96 because the A428 will prevent social interaction with the village core to the north
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	We disagree. The development requirements include a pedestrian crossing on Rugby Road (A428) to ensure reasonable pedestrian routes to and from the rest of the village. It is expected there will be opportunities for social interaction across the village through routes to the village school from the allocation site, and through existing village residents accessing the recreational facilities at the southern edge of the allocation site. Additionally, a new shop and community space is required as part of the neighbouring Land at Long Lawford site allocation.

Issue	The evidence points to a need for an active travel connection to Bilton School via Bilton Lane, not along the line of PRoW R126 to Henry Hinde School.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The development requirements include a safe walking and cycling route from the site to both Henry Hinde Junior School and Bilton School. This must include a controlled crossing point or bridge over the A4071. The development principles plan provides an

	indicative alignment for this. However, if it is demonstrated that a route on Bilton Lane is preferable this could equally meet the requirements of the policy.

4.35. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Following consultation with WCC archaeologist, modifications may be needed to maximise preservation of the Ridge and Furrow on site	Historic England
Consider how site could deliver safe walking and cycling route to schools in Bilton via Bilton Lane corridor	Warwickshire County Council
Site needs to incorporate high-quality walking, wheeling and cycling infrastructure and provide safe connection to existing and planned routes on A428	Warwickshire County Council
All of site should be removed from Green Belt so that development of southern part of site as open space is not unduly restricted (e.g. buildings needed as changing rooms or equipment storage).	Tritax Park Rugby West Limited
2nd dev requirement is too prescriptive. It should specify that a safe walking route shall be created but not state that a controlled crossing point or bridge over the A4071 is necessary.	Tritax Park Rugby West Limited
Landscape edge along Rugby Rd shown in diagram should be removed - it contradicts 4th dev requirement for built frontage along Rugby Rd.	Tritax Park Rugby West Limited
5th dev requirement for useable and attractive space above pipeline should be amended to state that this is "subject to the utility provider's requirements".	Tritax Park Rugby West Limited
Dev requirements 8, 9 and 10 should be amalgamated into a reworded 2nd dev requirement that encompasses all transport requirements and specifies that they are subject to agreement with the Highway Authority.	Tritax Park Rugby West Limited
Change the development requirement for a "pedestrian crossing" to a "controlled pedestrian crossing".	Allanach, Richard
Council response to modification proposals: The current development requirements are designed to ensure a high-quality and sustainable outcome at this site. Adding greater flexibility risks a poorer scheme being delivered, while being too prescriptive can place an unreasonable burden on developers and risks the site not coming forward. We believe the current approach has the right balance. In relation to the need for consultation with the archaeologist, this would happen at planning application stage. In relation to incorporating high-quality walking and cycling infrastructure on-site this is adequately covered by policy I1 Transport and national policy. Walking and cycling routes on the A428 are already referenced in the policy. The policy on delivering a walking and cycling route to Bilton would allow this to be delivered on Bilton	

Lane if this is shown to be the best solution.

Outward facing built frontage on Rugby Road can be delivered behind the green edge, there is no inconsistency. That green edge would ensure consistency on Bilton Lane with the neighbouring development site 316.

SITE 87 HILLCREST FARM, NEWTON

4.36. Five representations on behalf of five people or organisations argued that the allocation of site 87 is unsound. Three representations on behalf of three people or organisations argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Site is not in a sustainable location which is in contradiction with national policy.
Who raised the issue	Tarrant, John; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Kang, Jane; Critchley, P
No. raising the issue	7
Council response	This is a small-scale brownfield site/disused farm building development which is therefore felt to be a sustainable option for Newton. While there are limited facilities directly within the village, the site is close to services in Coton Park and Brownsover.

Issue	Safe walking routes to schools are not available, which makes the allocation in contradiction with national policy.
Who raised the issue	Tarrant, John; Bilton Grange School; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Mr and Mrs Hudson; Kang, Jane; Critchley, P
No. raising the issue	8
Council response	The development requirements include upgrades to walking and cycling routes which will connect to schools in Coton Park and Brownsover. Those routes will be improved through the developments at Coton Park East (site 64) and Newton Manor Lane (site 54).

Issue	Development should come forward as windfall or identified in the emerging neighbourhood plan
Who raised the issue	Bilton Grange School
No. raising the issue	1
Council response	The site is allocated in the local plan to reduce the risk of the site not coming forward for development and to ensure sustainable and high-quality development outcomes are achieved. The Newton and Biggin Neighbourhood Plan is still ongoing and does not intend to allocate any sites.

Issue	Access onto Newton Lane as proposed in Masterplan Option B would be unsafe. Access should be directly opposite the Leys or via Hollies Road.
Who raised the issue	Harris, Andrew
No. raising the issue	1
Council response	There are not considered to be impediments to delivering safe access to the site. Detailed access arrangements would be considered at planning application stage.

4.37. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Require that vehicular access be directly opposite the Leys or via the Hollies.	Harris, Andrew
Additional land is available at the Hillcrest Farm site for larger allocation	Newton LDP
A development requirement should be added to ensure that the existing roadside boundary hedge and trees are retained and strengthened, and any footpath should be set behind them rather than adjacent to carriageway	Davis, Ian; O'Connell, Mark
It should be made a development requirement that this hedgerow and trees be retained, protected and strengthened and that any footpath should be on its development side to ensure its retention and in the interests of visual amenity and ecology	O'Connell, Mark
Planting around the site should mask the new buildings and maintain the rural aspect from Great Central Walk towards Newton	O'Connell, Mark
Council response to modification proposals: Detailed access arrangements can be determined at planning application stage Given Newton is a small village, it is not considered that a larger site allocation is justified. In relation to retention and strengthening of boundary hedges and planting on the western boundary, the council does not consider that modifications are necessary to address issues of soundness, however, would not object to such modifications if considered to be necessary by the inspector(s).	

SITE 353 TOWN HALL, RUGBY

4.38. One representation on behalf of one person or organisation argued that the allocation of site 353 is unsound. The following main issues were raised with this site allocation:

Issue	Site does not have a heritage assessment and is therefore not underpinned by current evidence nor is justified
Who raised the issue	Historic England
No.	317

raising the issue	
Council response	A heritage assessment has been produced and is submitted as document SS29.

Issue	Allocation is for 43 fewer dwellings than its capacity as advised by the Urban Capacity Study, this sub-optimal use of brownfield land is inconsistent with national policy.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The site allocation figure is based on preliminary site layout drawings, as opposed to the generic formula used in the Urban Capacity Study (SS6 and SS7) and is designed to provide high quality housing, while ensuring deliverability.

4.39. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend the site boundary to that assessed in the Urban Capacity Study and allocate the site for 157 dwellings, not 114.	Allanach, Richard
Council response to modification proposals: The issue of allocated units is addressed above in the main issues. The site boundary has been amended from that in the Urban Capacity Study to retain the community facility Benn Hall, Newbold Road car park and the heritage buildings. Only the Town Hall building itself and parking to the front and west are to be redeveloped as part of this site.	

SITE 283 RUGBY CENTRAL SHOPPING CENTRE, RUGBY

4.40. One representation on behalf of one person or organisation argued that the allocation of site 283 is unsound. The following main issues were raised with this site allocation:

Issue	Site does not have a heritage assessment and is therefore not underpinned by current evidence nor is justified. Historic England raised concerns at applications in 2022 and 2023.
Who raised the issue	Historic England
No. raising the issue	1
Council response	The site already has planning permission (R22/0657) so further heritage assessment was not considered necessary for the purposes of the plan allocation. This is addressed in the

draft Statement of Common Ground with Historic England (document SOCG10).

SITE 350 ROUNDS GARDENS, RUGBY

4.41. One representation on behalf of 134 people or organisations argued that the allocation of site 350 is sound. The following main issues were raised with this site allocation:

Issue	Support the allocation but prefer it to be reduced (and green space increased) and resist any increase in the allocation. Make the case for securing green space benefit in an area of deficit.
Who raised the issue	Save Rounds Gardens (New Bilton Community Association)
No. raising the issue	134
Council response	We consider the current allocation figure to strike the right balance between making efficient use of this sustainable site and ensuring high-quality housing and adequate amenity space is delivered.

Issue	Allocation is for 5 fewer dwellings than recommended by Urban Capacity Study and represents sub-optimal use of land which is contrary to national policy.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	We consider the current allocation figure to strike the right balance between making efficient use of this sustainable site and ensuring high-quality housing and adequate amenity space is delivered. The allocation figure is based on preliminary site layout drawings, as opposed to the generic formula used in the Urban Capacity Study (SS6 and SS7). The lower figure is therefore a more realistic assessment of capacity.

4.42. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Allocation should be reduced with more green space provision - address area of deficit	Save Rounds Gardens (New Bilton Community Association)
Change from 70 units to 120 units - delivered in line with Biart Place/Navigation Way	RBC Conservative Group
Allocate the site for 75 units, not 70, as recommended by the Urban Capacity Study.	Allanach, Richard
Council response to modification proposals: The Council believes the current allocation figure strikes	

the right balance between making efficient use of this sustainable site and ensuring high-quality housing and adequate amenity space is delivered. The figure is based on preliminary site layout drawings. The site is close to Caldicott Park offering additional public open space.

SITE 351 NORTH OF ROUNDS GARDENS, RUGBY

4.43. One representation on behalf of one person or organisation argued that the allocation of site 351 is unsound. The following main issues were raised with this site allocation:

Issue	Site is a potential Local Wildlife Site so should not have passed housing site assessment or Sustainability Appraisal assessment
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	A potential Local Wildlife Site has not been surveyed or assessed to determine whether or not it meets the criteria for designation as a local wildlife site. The site was recently the subject of a s78 appeal decision in respect of a proposal for a more intensive development of the site which was dismissed but the reasons for dismissing the proposal did not include ecology concerns.

4.44. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Clarify that reference to access from Princes Street and Willans Place is in terms of active travel	Warwickshire County Council
Council response to modification proposals: The development requirements plan shows both vehicular and pedestrian access points from Princes Street and Willans Place. The development requirements already state there is to be no east-west route through the site for vehicles.	

SITE 354 92 LOWER HILLMORTON ROAD, RUGBY

4.45. There were no main issues regarding this allocation. There was one recommended modification as shown below.

Modification summary	Proposer(s)
Crossing of Hillmorton Road needed as the footway to the south of the road ends at the rail bridge.	Warwickshire County Council
Council response to modification proposals: Noted that this may be required. Specific highways and access considerations can be addressed at planning application stage and managed through conditions.	

SITE 279 STAGECOACH CAR PARK, RUGBY

4.46. There were no main issues regarding this allocation. There was one recommended modification as shown below.

Modification summary	Proposer(s)
Refer to the Rugby Railway Station/Town Centre Active Travel Zone and potential LCWIP improvements in the development requirements for consistency with other proposed town centre sites	Warwickshire County Council
Council response to modification proposals: Not all town centre sites explicitly refer to this in the development requirements. This does not preclude the site from contributing to these schemes.	

SITE 153 WESTWAY CAR PARK, RUGBY

4.47. The following main issues were raised with this site allocation:

Issue	Site is only allocated for 24 units despite the UCS specifying that it could accommodate 38 units - inconsistent with national policy re: optimal use of land
Who raised the issue	Eaton, David; Allanach, Richard
No. raising the issue	2
Council response	The site allocation figure is based on preliminary site layout drawings, as opposed to the generic formula used in the UCS (SS6 and SS7) and is designed to provide high quality housing, while ensuring deliverability. The site layout drawings provide a more realistic assessment of site capacity.

4.48. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Allocate the site for 38 units, not 24.	Allanach, Richard
Council response to modification proposals: Please see council response to this main issue above.	

SITE 338 LAND SOUTH OF CRICK ROAD, HOULTON

4.49. Two representations on behalf of two people or organisations argued that the allocation of site 338 is unsound. One representation on behalf of 298 people or organisations argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Red line boundary in the policy text doesn't match the proposals map
Who raised	Urban & Civic

the issue	
No. raising the issue	1
Council response	Noted. Correcting this is identified as a suggested additional modification in document CD20.

Issue	Houlton outline planning permission already makes provision for pedestrian access to Rugby Parkway station so development requirement for a further connection is unjustified
Who raised the issue	Urban & Civic
No. raising the issue	1
Council response	The development requirements are designed to ensure the site as a residential allocation has good links with the proposed Rugby Parkway station. The outline planning permission did not envisage residential development on this site. Therefore, the development requirement is required.

Issue	Requirement for contributions towards cycle route network improvements are not justified as routes are either within or required as part of the Houlton or DIRFT developments already approved.
Who raised the issue	Urban & Civic
No. raising the issue	1
Council response	The development requirements only state that contributions “may be required” – the details would be considered at application stage and in the drawing up of a S106 agreement.

Issue	Reiterate observations at Reg 18 stage and request that impacts are fully considered and mitigated.
Who raised the issue	West Northamptonshire Council
No. raising the issue	1
Council response	Noted.

Issue	Proposed density is too low - it runs contrary to Council's own guidance for calculating appropriate densities (HELAA) and is inconsistent with national policy re: uplifting of densities in sustainable locations.
Who	Allanach, Richard

raised the issue	
No. raising the issue	1
Council response	Density ratios referenced in the HELAA (SS2) are noted to be used where no other indicative site area information has been submitted. The call for sites submission letter indicated the site was available for development of c.250 units. This equates to a gross density of 40 dwellings per hectare and assuming crudely a 75% developable area (it may be lower) a net density of 53dph. At 60% net developable area the density would be 67dph. This density is not too low.

4.50. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Remove requirement for pedestrian access to Rugby Parkway	Urban & Civic
Remove requirement for contributions to cycling route schemes	Urban & Civic
Site is directly adjacent to Rainsbrook Valley landscape of elevated sensitivity so would need to be tested early on through a Sustainability Appraisal process	Warwickshire Wildlife Trust
Require the development to meet a minimum density standard of 100 dwellings per hectare	Allanach, Richard
Require cycle (not just pedestrian) access to Rugby Parkway station.	Allanach, Richard
Council response to modification proposals: The current development requirements are designed to ensure a high quality and sustainable development outcome at this site which was originally proposed for employment land under the Houlton outline planning application. The density is as noted above considered appropriate. The site is shown to in the evidence base to have low landscape sensitivity (document SS23). A requirement for cycle as well as pedestrian access to the station is not considered necessary to address an issue of soundness, but the council would not object to this modification were the inspector(s) to wish to make it.	

SITE 59 NEWTON MANOR LANE, BROWNSOVER

4.51. 29 representations on behalf of 558 people or organisations argued that the allocation of site 59 is unsound. Three representations on behalf of four people or organisations argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Loss of separation and separate identities between Rugby and Newton
Who raised the issue	Realf, Peter; Allanach, Richard

No. raising the issue	2
Council response	The site allocation does not fill in the gap between Newton and the Rugby urban edge. The allocation also includes a large new public open space to protect part of the gap between the two boundaries.

Issue	Location requires car travel to access most employment and leisure destinations
Who raised the issue	Marley, Luke; Allanach, Richard
No. raising the issue	2
Council response	This site is within relative proximity and reasonable cycling distance of Rugby town centre with leisure and employment opportunities. There are also nearby bus routes which connect to Rugby train station. It is considered that this site does not have materially worse access to leisure and employment opportunities via non-car modes than other sites on the Rugby urban edge.

Issue	Newton Manor Lane is a dangerous road with no footpath and non-standard cross roads - this danger will be exacerbated by increased traffic from development
Who raised the issue	Marley, Luke; Dixon, Chris; Thursfield, Keith; Fagg, Christopher and Barbara; Edmondson, Elizabeth; Varma, Chaitanya; Newton Manor Lane residents group; Residents of Speedwell Close; Sharma, Nishtha; Devendar, Abhishekh; O'Connell, Mark; Allanach, Richard
No. raising the issue	541
Council response	The development requirements include provision of pedestrian footway and cycle track along Newton Manor Lane, measures to manage the speed of motor traffic on Newton Manor Lane as well as contributions to the A426/Newton Manor Lane scheme identified by the Strategic Transport Assessment (I3) and set out in the Infrastructure Delivery Schedule (I2). It is felt these measures will mitigate any potential road impacts. Further site-specific local interventions including at the St Thomas Cross junction would be considered at the planning application stage.

Issue	Flood risk will be exacerbated in surrounding residential areas - contrary to NPPF & EN7 of this plan
Who raised the issue	Marley, Luke; Thursfield, Keith; Edmondson, Elizabeth; Varma, Chaitanya; Newton Manor Lane residents group; Gupta, Vikas; Residents of Speedwell Close
No. raising the issue	535
Council response	The Strategic Flood Risk Assessment (SS9) included a detailed site summary table (SS11) which made recommendations to ensure the site would be made safe for its lifetime. Development will be dependent on a site-specific flood risk assessment and suitable

	sustainable urban drainage systems (SuDS) which must also demonstrate that there will be no increased risk to other properties.

Issue	Loss of green space, harms to setting of Great Central Walk and effect on wildlife
Who raised the issue	Marley, Luke; Varma, Chaitanya; Newton Manor Lane residents group; Sharma, Nishtha
No. raising the issue	509
Council response	The site was subject to an ecological constraints assessment (SS25) which concluded the site had the potential to be developed subject to satisfactory mitigations. Specific measures will be assessed at application stage. The development requirements include an appropriate edge including landscape buffer to the Great Central Walk Local Wildlife Site. The site will also include delivery of St Thomas Cross Fields on the eastern portion of the site as public open space.

Issue	Development requirements do not account for the overhead power line
Who raised the issue	National Grid Electricity Distribution
No. raising the issue	1
Council response	An overhead powerline oversales the northern part of the site. There are no pylons on site. This is not considered to be an impediment to the development of the site. This would be handled at application stage when the specific site layout is known. It is anticipated there would be a green corridor under the power lines, as there is further to the west.

Issue	Insufficient infrastructure (schools, doctors, dentists etc) & strained utilities (water, power etc)
Who raised the issue	Edmondson, Elizabeth; Varma, Chaitanya; Newton Manor Lane residents group; Residents of Speedwell Close
No. raising the issue	532
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers such as the local education authority, Integrated Care Board (NHS), local highways authority and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. A two-stage Water Cycle Study has been produced (documents I7-I10) which assesses the impact that future growth, including this allocation, may have on water resources, water supply infrastructure, and wastewater collection and treatment. This concludes

	that "Overall, no issues have been identified that would impede the progress of development sites" and that "any necessary investments or infrastructure planning can be managed through the established procedures over the course of the plan period." Seven Trent Water, the water and sewerage provider for the Borough, have been consulted throughout the plan-making process and will continue to be informed as it progresses so that infrastructure can be appropriately planned. The education topic paper (document I11) does not identify school place constraints to development in this location.

Issue	Expands development beyond a defensible boundary - gap between Brownsover and Newton was previously considered unsuitable for development and was part of an Area of Restraint at the time of the Warwickshire Structure Plan - impact is still relevant today
Who raised the issue	Realf, Elizabeth; O'Connell, Mark; Allanach, Richard
No. raising the issue	3
Council response	Structure plans have not been in place 2004, and the Warwickshire Structure Plan has been superseded by multiple planning documents since. The site is a sustainable location on the edge of the Rugby urban area and will also deliver public open space. The site will create a new defensible settlement boundary between Brownsover and Newton through designation of a large new public open space at St Thomas Cross junction.

Issue	Alternative use as open space/parkland could deliver community benefit
Who raised the issue	Newton Manor Lane residents group
No. raising the issue	506
Council response	Part of the site, St Thomas Cross Fields, will deliver public open space. The development requirements also include community orchards and allotments which will provide a community benefit. It is not realistic for the entire site to be delivered as public open space as this would likely require a compulsory purchase order by the council.

Issue	Existing vibrations from passing traffic to be exacerbated
Who raised the issue	Newton Manor Lane residents group; Gupta, Vikas; Residents of Speedwell Close
No. raising the issue	531
Council response	All development proposals are subject to a construction management plan once planning permission is granted to minimise disruption from construction traffic.

Issue	Lack of adequate strategic transport modelling for the area

Who raised the issue	Devendar, Abhishekh
No. raising the issue	1
Council response	The Strategic Transport Assessment (I3) considered the cumulative effects all development proposals, including this site, using advanced transport modelling. It identified a requirement for upgrades to the A426 Leicester Road/Newton Manor Lane Roundabout to mitigate impacts of this site, as set out in the Infrastructure Delivery Schedule (I2).

Issue	Directly adjacent to designated Local Wildlife Site (Coton Park Pool) which is important for biodiversity and legally protected species
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	The site was subject to an ecological constraints assessment (SS25) which concluded the site had the potential to be developed subject to satisfactory mitigations. Specific measures will be assessed at application stage.

Issue	No evidence has been presented to justify increasing the allocation by 45 dwellings between Reg 18 and Reg 19
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The increase in allocation units is based on an updated masterplan submitted by the developer. The council considers that the site can suitably be developed for the proposed number of dwellings while retaining significant green space provision on site.

Issue	No evidence gathered to show that development will not be on best and most versatile farmland
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The site is grade 3 agricultural land which is not Best and Most Versatile.

Issue	Allocation is in Newton & Biggin Parish, Newton is a third-tier settlement and the evidence

	shows there is no strategic case for allocating at third tier settlements.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	Although the allocation site lies within Newton and Biggin Parish, it is removed from the village of Newton and is adjacent to Brownsover, part of the Rugby Urban Area. It is considered the site is functionally within Brownsover in terms of access to services and is therefore a justified and sustainable location for development.

Issue	St. Thomas Cross junction is unsafe as it is. Development will exacerbate this, yet no mitigation measures are proposed
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The development proposals include measures to slow motor traffic on Newton Manor Lane which will help improve the safety of St Thomas Cross junction. Detailed site-specific transport mitigation can be considered at planning application stage.

Issue	Not having a development requirement to place the required footpath and cycleway on the development side of the hedge on Newton Manor Lane risks it being torn out to make space
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	This is a detailed site design matter that can be considered at planning application stage.

4.52. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Strengthening of development requirements to deliver improvements and safety measures to Newton Manor Lane and St Thomas Cross junction and potentially improve active travel links	Dixon, Chris; Thursfield, Keith; Allanach, Richard
Insert a requirement for the masterplanning of the development to account for the overhead power line, enabling it to remain in situ.	National Grid Electricity Distribution
The dwelling site and open space site should be reversed in order to	O'Connell, Mark

maintain the boundary at Great Central Way and to give access to the open space to new and existing residents	
Existing footpaths and cycle paths should be improved and new public footpaths should be added. A natural buffer should be enforced at Great Central Way to mask buildings and maintain the rural walk.	O'Connell, Mark
Require the development to mitigate safety concerns at St Thomas Cross junction.	Allanach, Richard
Require the development to contribute to a high-quality public transport link to Rugby town centre.	Allanach, Richard
Require the development to ensure an appropriate edge, including landscape buffer, to the stream at the eastern edge of the site.	Allanach, Richard
Require the development to provide a pedestrian footway and cycle track along the development side of Newton Manor Lane's northern hedge, preventing the need for the hedge to be destroyed to provide this facility.	Allanach, Richard
Council response to modification proposals: The current development requirements are designed to ensure a high-quality and sustainable development outcome while also maintaining flexibility at this stage in the process. The details of the site layout and design are yet to be finalised and many of these issues can be addressed at application stage and managed through conditions.	

SITE 100 LAND AT HIGH STREET, RYTON-ON-DUNSMORE

4.53. One representation on behalf of one person or organisation argued that the allocation of site 100 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	This site is designated as Warren Farm Local Wildlife Site, yet the site has not been subjected to an ecological constraints assessment. Without this evidence and appropriate development requirements, the allocation of the site is unjustified and inconsistent with national policy.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	This site was allocated in the Ryton on Dunsmore Neighbourhood Plan. The principle of development has therefore already been established at this site. A recent appeal was dismissed in relation to the site (planning application Ref R22/1120 and PINS ref APP/E3715/W/25/3359147 appeal decision date 27 May 2025). Neither the reasons for refusal nor the reasons for dismissing the appeal included the site's designation as a local wildlife site.

4.54. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Add a development requirement specifying that an ecological appraisal should be undertaken at the outset and all proposals should follow the national policy hierarchy of avoid, mitigate and compensate.	Allanach, Richard
Council response to modification proposals: This is covered by national policy and the validation checklist of the Council for major housing applications (see https://www.rugby.gov.uk/documents/20124/6589626/Validation+Checklist+Feb+2024.pdf/0e5c8781-9b91-e1b7-1a18-f762bd430f97?t=1750866323611)	

SITE 6 LAND EAST OF FOSSE WAY OPPOSITE KNOB HILL, STRETTON-ON-DUNSMORE

4.55. Four representations on behalf of four people or organisations argued that the allocation of site 6 is unsound. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. Unsustainable location due to need to drive to access services.
Who raised the issue	Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Waterworth, Tom
No. raising the issue	7
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. Stretton scored well in the Rural Sustainability Study (SD14) with local access on foot to a primary school, GP surgery, small shop and pub.

Issue	Inclusion of the site is not consistent with the PPG (as described in the HELAA) - sites with capacity for fewer than 5 dwellings should not be allocated
Who raised the issue	Yates, Alan; Allanach, Richard
No. raising the issue	2
Council response	The site is within the Green Belt and has therefore been allocated for development in the Local Plan to ensure it is able to come forward. This is consistent with the council's desire to bring forward a diverse range of different sites.

Issue	Development would increase traffic and exacerbate congestion on the Fosse Way. Visibility at the nearby cross-roads is already poor.

Who raised the issue	Yates, Alan; Pinchen, Mary
No. raising the issue	2
Council response	This is a small-scale infill development proposal for 3 dwellings which is not expected to create significant impacts on the road network.

Issue	If Green Belt boundary is moved to enable new development there is no further physical feature available to define a clear & permanent boundary to prevent further encroachment on countryside. This does not comply with NPPF.
Who raised the issue	Yates, Alan
No. raising the issue	1
Council response	The site is directly opposite an existing dwelling which will help to create a defined new boundary for the Green Belt, with this allocation functioning more like infill development. There is an existing planting belt and garage business adjacent to the site which remains in the Green Belt, further reinforcing the boundary.

Issue	Location on the outskirts of the settlement with no connecting footway to safely access facilities makes this an unsustainable location for development
Who raised the issue	Mr and Mrs Hudson; Critchley, P
No. raising the issue	3
Council response	Although on the settlement edge, the site is within reasonable walking distance of village services (estimated 6 minutes to the GP surgery and 12 minutes to the primary school) making this a sustainable location within the village. There are already residential dwellings on this stretch of road. The need for upgrades to crossing points or walking routes would be considered at planning application stage.

Issue	Site is unsuitable because part of it lies within Flood Zones 2 and 3.
Who raised the issue	Critchley, P
No. raising the issue	1
Council response	The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) show that 97.9% of the site lies within Flood Zone 1 (low risk of fluvial flooding). There is a more significant risk of surface water flooding which meant the site was subject to further assessment and a site summary table was prepared (SS10) which concluded the site could be made safe for

	its lifetime. A site-specific flood risk assessment will be required at application stage.

4.56. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Concern about lack of footway and recommend need for safe crossing provision as no existing footway	Warwickshire County Council
Require affordable housing to be delivered at the site (if not deleted)	Allanach, Richard
Council response to modification proposals: The allocation is for 3 dwellings and is therefore exempt from policy H2 which only applies to allocations of 10+ units. Specific highways and access considerations can be addressed at application stage.	

SITE 81 LAND WEST OF FOSSE WAY, STRETTON-ON-DUNSMORE

4.57. 8 representations on behalf of 12 people or organisations argued that the allocation of site 81 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. Unsustainable location due to need to drive to access services.
Who raised the issue	Farmer, Antony; Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Waterworth, Tom
No. raising the issue	8
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. Stretton scored well in the Rural Sustainability Study (SD14) with local access on foot to a primary school, GP surgery, small shop and pub.

Issue	Site will cause harm to Green Belt. Brownfield should be used instead of Green Belt land
Who raised the issue	Farmer, Antony; Yates, Alan
No. raising the issue	2
Council	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for

response	allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt.

Issue	Proposals will cause harm to the existing Brook, damaging ecosystems and local identity/heritage
Who raised the issue	Thompson, Julia
No. raising the issue	1
Council response	The site did not meet the threshold for an ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. A site-specific ecological assessment will be required at application with mitigatory measures required to ensure no adverse impacts on the brook. The area around the brook will deliver a 2.3 hectare public open space which will minimise harms on the brook and associated ecosystems.

Issue	Loss of local wildlife habitats and harm to wildlife during construction
Who raised the issue	Thompson, Julia
No. raising the issue	1
Council response	The site did not meet the threshold for an ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. A site-specific ecological assessment will be required at application with mitigatory measures required to ensure no adverse impacts on local wildlife. The development will be subject to a construction management plan once permission is granted.

Issue	Development would increase traffic and exacerbate congestion on the Fosse Way
Who raised the issue	Yates, Alan; Pinchen, Mary
No. raising the issue	2
Council response	The Strategic Transport Assessment (I3) did not identify significant impacts on the Fosse Way from this development. There may be a requirement for upgrades to Princethorpe Crossroads and Bretford Bridge to accommodate cumulative impacts of this allocation and others in Wolston and Ryton-on-Dunsmore, as set out in the Infrastructure Delivery Schedule (I2). The need for further site specific transport measures would be considered at planning application stage.

Issue	Considerable archaeological interest makes the site unsuitable

Who raised the issue	Critchley, P
No. raising the issue	1
Council response	The heritage assessment (SS19) did identify the site as having significant potential archaeological interest. This led to preliminary archaeological surveys including a geophysical survey submitted by the site promoter at Regulation 18 preferred options stage which suggest this potential is low. The development will be subject to further assessments at application stage.

Issue	Site is some distance from the school and recreation facilities on Plott Lane - though not far as the crow flies.
Who raised the issue	Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council
No. raising the issue	5
Council response	The school is approximately 10 minutes' walk from the allocation site using the public footpath at the edge of the site. It is acknowledged that this route is not suitable for all weathers or users. Following the main paved roads takes approximately 15 minutes which is still considered to be reasonable for most users. It also 15 minutes' walk to the recreation facilities on Plott Lane. The site will feature its own public open space and is also very close to the Stretton-on-Dunsmore Recreation Ground which includes children's play provision. The development requirements include pedestrian crossing on Fosse Way to create safe access to the recreation ground.

Issue	Land has surface water flooding issues. Drainage needs improving as well as pond at Well Head
Who raised the issue	Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Critchley, P
No. raising the issue	6
Council response	The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) identified surface water flood risk, and a detailed site summary table was prepared (SS11) which concluded the site could be made safe for its lifetime. It noted that flood risk was concentrated in the southern half of the site, which includes the area intended for public open space. Planning permission will be subject to a site-specific flood risk assessment and appropriate drainage schemes.

4.58. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Development requirements including specified open space requirements, direction of frontages and overlooking requirements should be reduced to ensure flexible masterplanning	Ashberry Strategic Land
Requirement for archaeological investigation to inform preservation by design around the potential presence of Roman road remains and associated buildings/evidence	Historic England
Council response to modification proposals: The development requirements are designed to ensure a high-quality and sustainable outcome at this site and introducing too much flexibility risks a poorer outcome with regard to open space provision, site design and safety. Proactive archaeological investigation is already a requirement, however the council has identified the wording suggested by Historic England as a potential modification.	

SITE 348 THE CROFT, STRETTON-ON-DUNSMORE

4.59. 9 representations on behalf of 12 people or organisations argued that the allocation of site 348 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Insufficient mitigatory measures for traffic impacts from the development
Who raised the issue	Cox, Jeremy; Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Waterworth, Tom; Critchley, P; Tett, Tracey
No. raising the issue	10
Council response	The Strategic Transport Assessment (I3) identified that there may be a requirement for upgrades to Princethorpe Crossroads and Bretford Bridge to accommodate cumulative impacts of this allocation and others in Wolston and Ryton-on-Dunsmore, as set out in the Infrastructure Delivery Schedule (I2). This site was found to be preferable to alternatives partly because of its position closer to the strategic road network, reducing some of the traffic through the village. The need for further site specific transport measures would be considered at planning application stage.

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. Unsustainable location due to need to drive to access services.
Who raised the issue	Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Tett, Tracey
No. raising the issue	7
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water.

	Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. Stretton scored well in the Rural Sustainability Study (SD14) with local access on foot to a primary school, GP surgery, small shop and pub.

Issue	Little detail available on this site meaning a deficit in the opportunity for public scrutiny - not included at Regulation 18 stage
Who raised the issue	Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council
No. raising the issue	6
Council response	It is true the site was only proposed to be allocated at Regulation 19 stage, and this parcel had been part of a larger omission site (ID 120) at Regulation 18. The second regulation 18 'preferred options' stage was an optional second consultation. The process of preparing the plan was consistent with the regulations and the Statement of Community Involvement. Notably some consultation respondents commented that they preferred it indicating it was available for public scrutiny, albeit in a different context. There will be further consultation on the site once it comes forward as an application.

Issue	When considering the Squires Road site in the current plan, the inspector's report assessed that the boundary for that development would 'form an effective permanent boundary to the Green Belt at this point.' If this site is allocated, it would show this assessment to be incorrect as it would increase incursion into the Green Belt. No valid justification for this.
Who raised the issue	Yates, Alan; Waterworth, Tom
No. raising the issue	2
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt land. It is inherent in plan making that Green Belt boundaries cannot necessarily be permanent. The site allocation and Green Belt boundary is defined by existing field boundaries as is the northern boundary to the Squires Road site, a new defensible Green Belt boundary can be created.

Issue	Development of this site would mean loss of agricultural land, some of which is of historic value as it retains its ridge and furrow heritage.
Who raised the issue	Yates, Alan
No. raising	1

the issue	
Council response	The site is grade 3 agricultural land so is not considered Best and Most Versatile. The validation of landscape sensitivity assessments for small sites report (SS23) noted subtle ridge and furrow visible in the western field. This is a matter than can be considered in more detail at planning application stage.

Issue	Proximity to the A45 requires noise mitigation and safe access
Who raised the issue	Stretton-on-Dunsmore Parish Council
No. raising the issue	1
Council response	Both of these points would be considered in detail at application stage.

Issue	Site has not been subject to robust and consistent assessment in comparison with other sites
Who raised the issue	Critchley, P
No. raising the issue	1
Council response	The council disagrees. Although new in its current form, this parcel of land formed site 120 which was subject to the initial site selection process. Site 348 has been considered in the Stage 2 Site Assessment (SS8) alongside all other sites.

Issue	Site is detached from the village and would be incongruous pattern of development
Who raised the issue	Taylor Wimpey
No. raising the issue	1
Council response	The site is slightly removed from the existing settlement centre but is adjacent to the primary school and will border the upcoming Squires Road site. The overall pattern once built out is not felt to be incongruous.

Issue	One of the more sensitive sites in Stretton for landscape and will harm the rural character of School Lane
Who raised the issue	Taylor Wimpey
No. raising the issue	1
Council	The validation of landscape sensitivity assessments for small sites report (SS23) found

response	the site to have medium/low sensitivity with the main sensitivity being the subtle ridge and furrow. It noted the semi-rural character and limited scenic quality arising from the position adjacent to the football pitches and nearby residential development. The site has a sense of enclosure from boundary vegetation. Any development of fields will change their rural character, but this is not felt to be a reason why the site should not be developed.

Issue	Increased risk of flooding, the sewerage system is inadequate for new housing
Who raised the issue	Tett, Tracey
No. raising the issue	1
Council response	With regards to flooding, the Strategic Flood Risk Assessment (SS9) and Sequential Test (SS14) found the site to be at low risk of surface water flooding and none of the site is in flood zones 2 or 3. With regards to sewerage, the site was included in residential growth scenario four as modelled by the Stage 2 Water Cycle Study, which concluded that “overall, no issues have been identified that would impede the progress of any development sites” and that “any necessary investments or infrastructure planning can be managed through the established procedures over the course of the plan period”.

Issue	Degradation of habitats for great-crested newts and other wildlife
Who raised the issue	Tett, Tracey
No. raising the issue	1
Council response	The site did not meet the threshold for ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. Further ecology assessments would be required at application stage, and development would be subject to demonstrating that no protected species such as great crested newts are present on the site or would be harmed by the development

Issue	Housing mix is not appropriate – house prices on current Squires Road development have been decreased due to not being sold, this demonstrates that more affordable housing needed rather than larger executive housing
Who raised the issue	Tett, Tracey
No. raising the issue	1
Council	Housing mix will be based on policies H1 and H2 in the local plan which are designed to

response	meet the needs of the borough while ensuring viability of proposals. As a grey belt site, the developer will be required to deliver 40% affordable housing, in line with policy H2.

4.60. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
New entrance to the school should be created	Key-Vice, Gillian
Development should be joined with Squires Road to enable traffic from both sites to exit onto School Lane	Key-Vice, Gillian
Council response to modification proposals: Both modifications affect land in separate ownership and cannot be guaranteed. This is particularly the case with the second modification. The development requirements encourage the developer to explore active travel connections toward the recreation ground off Plott Lane which would include pedestrian access through the Squires Cross site. Vehicular access is not thought to be realistic.	

SITE 39 DYERS LANE, WOLSTON

4.61. 14 representations on behalf of 242 people or organisations argued that the allocation of site 39 is unsound. The following main issues were raised with this site allocation:

Issue	Insufficient local infrastructure (schools, hospitals etc) and transport links to support new housing
Who raised the issue	Farmer, Antony; Ward, Ettillia-Shai; Kenney, Neil; Lumsden, Peter; Willis, Tim; Ramsay, Terence; Mumford, Fiona; Rainey, Graham; Lumsden, Jennifer; Wolston Parish Council; MacFarlane, Iain; Thorne, Elizabeth
No. raising the issue	240
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4.

Issue	Use of Green Belt land is unjustified. Brownfield land should be prioritised
Who raised the issue	Farmer, Antony; Ward, Ettillia-Shai; Kenney, Neil; Mumford, Fiona; Rainey, Graham; Lumsden, Jennifer; Wolston Parish Council; MacFarlane, Iain; Thorne, Elizabeth
No. raising	237

the issue	
Council response	It is not possible to meet the Borough's housing need using brownfield land. The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt. Wolston has one of the larger populations of the main rural settlements and scores well in the Rural Sustainability Study (SD14) which is felt to justify this allocation.

Issue	Unacceptable impact on landscape, and/or contrary to high landscape sensitivity identified in previous evidence
Who raised the issue	Ward, Ettillia-Shai; Kenney, Neil; Ramsay, Terence; Wolston Parish Council
No. raising the issue	232
Council response	The Landscape Sensitivity Assessment for smaller sites (SS22-23) found the site to have low sensitivity due to its enclosure, location in between residential development and the cemetery and telephone exchange. The main sensitivity arises from the tranquillity. The plan is based on current evidence.

Issue	The village centre has insufficient parking to accommodate the additional cars that will be brought by further housing.
Who raised the issue	Kenney, Neil; Thorne, Elizabeth
No. raising the issue	2
Council response	The site is within reasonable walking distance of village services and so is not expected to create a significant increase in demand for parking in the village.

Issue	Developing the site will have unacceptable ecological impacts - lack of ecological survey
Who raised the issue	Kenney, Neil; Wolston Parish Council
No. raising the issue	230
Council response	The site did not meet the threshold for an ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. Ecology assessments will be required at application stage.

Issue	Site is susceptible to flooding and sewerage would be an issue
Who raised the issue	Kirkman, Frederick; Mumford, Fiona; Rainey, Graham; Wolston Parish Council; MacFarlane, Iain; Hill, Alison

No. raising the issue	234
Council response	The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) found the site to have low surface water flood risk and none of the site is in flood zones 2 or 3. The Stage 2 Water Cycle Study concluded the site would have a medium impact on the foul sewerage system and low impact on the surface water sewerage system. It was concluded to be low risk by Severn Trent Water.

Issue	Access to and from the site will struggle under additional traffic - Dyers Lane is narrow with limited pathways and frequently used by dogwalkers and horse riders, and those accessing playing fields
Who raised the issue	Rainey, Graham; Thorne, Elizabeth; Hill, Alison
No. raising the issue	3
Council response	This is a small site allocation for 15 units so any traffic impacts on Dyers Lane are not expected to be substantial.

Issue	Scale of development is disproportionate to the village and would harm local character, rural setting and built form
Who raised the issue	Lumsden, Jennifer
No. raising the issue	1
Council response	This site is for a small-scale development of 15 units and is not considered to be disproportionate or harmful to the village setting. The total number of units allocated at Wolston is c.95 which is relatively low given Wolston is one of the larger rural settlements. Proposals will be required to be in keeping with the local character and not harm the setting of the village.

SITE 136 NORTH OF WARWICK ROAD, WOLSTON

4.62. 20 representations on behalf of 248 people or organisations argued that the allocation of site X is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Unsustainable location for 55+ housing due to distance from local services, hospital and setting at the top of a hill
Who raised the issue	Hughes, Kerry; Moore, Donald; Ward, Ettillia-Shai; Kenney, Neil; Thursfield, Keith; Lumsden, Peter; Willis, Tim; Lumsden, Jennifer; Mistry, Bipin; Wolston Parish Council; Thorne, Elizabeth; Beament, Sally; Bearne, Andrew
No.	241

raising the issue	
Council response	The site is 15 minutes' walk from the GP surgery, 13 minutes' walk from small supermarket and 10 minutes' walk from the library and information centre. This is considered to be as sustainable a location as within a suburb of Rugby where housing may be a similar distance from a local centre. The walk into the village is largely flat.

Issue	Unacceptable harm to residential amenity of existing residents e.g. noise, traffic, green space
Who raised the issue	Hughes, Kerry; Malin, M; Moore, Donald; Kenney, Neil; Thorne, Elizabeth; Bearne, Andrew
No. raising the issue	6
Council response	The relatively small scale of development and existing tree line buffer with properties on Millenium Way means the proposal is not anticipated to have significant harm on nearby residents regarding material planning considerations. Planning permission will only be granted if the layout, design and massing of the proposal will not cause harm to residential amenity of nearby properties.

Issue	Lack of regard for conservation area, village character/identity and green belt status
Who raised the issue	Hughes, Kerry; Malin, M; Farmer, Antony; Ward, Ettillia-Shai; Willis, Tim; Rainey, Graham; Lumsden, Jennifer; Thorne, Elizabeth; Bearne, Andrew
No. raising the issue	9
Council response	The site is well removed from the village conservation area and listed buildings and does not likely contribute to its setting. The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt. Wolston has one of the larger populations of the main rural settlements and scores well in the Rural Sustainability Study (SD14) which is felt to justify this allocation.

Issue	Lack of infrastructure/Overburden on services (GP surgery, hospital, schools etc)
Who raised the issue	Malin, M; Farmer, Antony; Fletcher, Martin; Kenney, Neil; Hewitt, Michael; Lumsden, Peter; Willis, Tim; Ramsay, Terence; Rainey, Graham; Lumsden, Jennifer; Mistry, Bipin; Wolston Parish Council; Thorne, Elizabeth; Beament, Sally; Bearne, Andrew
No. raising the issue	243
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. This site has been allocated for over 55s housing to avoid impacts on capacity at the

	primary school. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4.

Issue	Wolston experiences flooding - increased flood risk has not been fully investigated
Who raised the issue	Fletcher, Martin; Moore, Donald; Thursfield, Keith; Willis, Tim; Ramsay, Terence; Mistry, Bipin; Wolston Parish Council; Bearne, Andrew
No. raising the issue	236
Council response	The local plan cannot address existing issues. Flood risk is managed by the Lead Local Flood Authority which is Warwickshire County Council and the Environment Agency. The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) found the site to have low surface water flood risk and none of the site is in flood zones 2 or 3. The site would need to demonstrate it will not increase flood risk elsewhere at application stage.

Issue	Harms to wildlife from loss of habitats - no ecological review of the site which abuts a Local Wildlife Site (LWS)
Who raised the issue	Thursfield, Keith; Willis, Tim; Ramsay, Terence; Lumsden, Jennifer; Mistry, Bipin; Wolston Parish Council
No. raising the issue	234
Council response	The site was subject to an ecological constraints assessment (SS25) which concludes that there are medium constraints, but the site has potential to be take forward for development subject to site design and mitigatory measures. The allocation does not directly abut a LWS although it is within 1km of the River Avon and Tributaries LWS. Further ecological surveys and mitigation schemes will be required at application stage.

Issue	Risk of utilities overload (Drainage, sewerage, water, gas, electricity)
Who raised the issue	Malin, M; Hewitt, Michael; Thursfield, Keith
No. raising the issue	3
Council response	The site selection and plan making process has involved consultation with the relevant utilities providers to ensure they can meet demand. The Stage 2 Water Cycle Study (I10) found the site to have a low potential impact on the foul sewerage infrastructure and a low potential impact on the surface water sewerage infrastructure i.e. drainage. Severn Trent Water did not raise comments on this site.

Issue	Site is within Minerals Safeguarding Area and concern about future working and restoration of Wolston sand and gravel quarry
Who	Warwickshire County Council

raised the issue	
No. raising the issue	1
Council response	Under its current planning permission Wolston quarry is required to cease quarrying and complete remediation by October 2027. The operation of the quarry is therefore not an impediment to the site coming forward during the plan period. Notwithstanding that, the council has identified a potential modification to the plan stating that the site should not be occupied until the quarrying has been finished. In relation to safeguarding of minerals, the council agrees with Warwickshire County Council that this will be assessed at planning application stage in line with the minerals local plan policies.

Issue	Allocation for older persons' housing will place a greater burden on the local GP surgery and on social care services - concerns raised in previous representations by Integrated Care Board (ICB) and Warwickshire County Council (WCC)
Who raised the issue	Willis, Tim
No. raising the issue	1
Council response	The Wolston GP surgery has fewer patients per full time GP than most other practices within the Borough. The site selection and plan making process has involved consultation with the ICB who identified d improvement and expansion options to accommodate the growth – this would be covered by S106 agreements and/or CIL funds. WCC has not raised this concern at Regulation 19 consultation.

Issue	Previous landscape studies have indicated that the land has 'high sensitivity' to housing development
Who raised the issue	Rainey, Graham; Lumsden, Jennifer; Mistry, Bipin; Wolston Parish Council
No. raising the issue	232
Council response	The plan is based on current evidence. The Landscape Sensitivity Assessment for smaller sites (SS22) found the site to have medium/low sensitivity due to its simple landform and features. The Validation of the landscape sensitivity assessment (SS23) concurred with that assessment. The main sensitivities arise from intervisibility with nearby properties and the PRow. Views to the north and west are to be incorporated into the layout design.

Issue	55+ accommodation is unlikely to offer affordable housing
Who raised the issue	Lumsden, Jennifer; Mistry, Bipin; Bearne, Andrew

No. raising the issue	3
Council response	It is true that specialist older persons' housing is exempt from the plan's wider affordable housing delivery requirements in Policy H2. This is based on the viability evidence.

Issue	Scale of development is of disproportionate scale with village and would harm local character, rural setting and built form
Who raised the issue	Lumsden, Jennifer; Mistry, Bipin
No. raising the issue	2
Council response	Wolston is one of the larger main rural settlements and scores well in the Rural Sustainability Study (SD14) with access to a primary school, GP surgery, small supermarket, library and leisure centre. This allocation for 80 units (and total allocations at Wolston for 95 units) is considered to be proportionate to the scale of the village and its services. Development proposals will need to be in keeping with the local character and not harm the rural setting.

Issue	Location & access to public transport etc make it unlikely that this site will go ahead as a retirement development & therefore likely it will revert to a non-retirement site/trojan horse for housing estate
Who raised the issue	RBC Conservative Group; Beament, Sally
No. raising the issue	17
Council response	This allocation is considered to be in a suitable location for over 55s housing or 1-2-bedroom bungalows and will meet local need. An application that is not in accordance with this policy would be contrary to the development plan.

Issue	There should be no access through Millenium Way
Who raised the issue	Beament, Sally
No. raising the issue	1
Council response	A pedestrian access point through Millenium Way would improve active travel connections between the site, other neighbourhoods and Wolston services, in line with NPPF para 96. It is therefore felt to be justified. No vehicular access through Millenium Way is proposed.

Issue	No requirements are proposed to safeguard the wildlife-rich pond in the NW corner of the site which is inconsistent with needs of national policy (NPPF 192)

Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	Noted. The site will be subject to further ecological assessment at application stage. There is no conflict with para 192 NPPF.

4.63. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Protect the boundaries of the site with a wildlife corridor with potential for walking routes	Thursfield, Keith
Any proposal should have a development requirement to retain/safeguard the pond in the NW corner of the site and its surroundings.	Willis, Tim; Allanach, Richard
Council response to modification proposals: The proposal will need to comply with national policy and EN1, EN5 and EN6 with regard to protecting and enhancing biodiversity. Further ecological assessment will be undertaken at application stage, and the above recommended mitigations could be managed through the application process.	

SITE 358 LAND AT COVENTRY ROAD, WOLVEY

4.64. 170 representations on behalf of 176 people or organisations argued that the allocation of site 358 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	Harm to village identity and quiet rural character through inappropriate and disproportionate level of growth
Who raised the issue	Evans, Elizabeth; Dhadwal, Sandeep; James, Charles; James, Catharine; Keogh, Damian; Court, Gerry & Carol; Spencer, June; Ling, Philip; Jones, David; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Dhadwal, Alicja; McDonagh, Judith; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Isaac, Susan; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Bassett, Graham; Chrimes, Brian; Bilton Grange School; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; West, Annette; Mr and Mrs Hudson; Beales, Dominic; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; Moore, Diane; Fisher, Hilary; Callery, Ruth; Fisher, Michael; Kelly, Patrick and Linda; Sheffield, Andy; Downes, Steve and Allyson; Hilliard, Sharon; Lovett, Lorna; Lovett, Peter; Lee, Joanne
No.	82

raising the issue	
Council response	The quantum of development at Wolvey has been substantially reduced since Regulation 18 and now totals 210 dwellings across both sites. This is thought to be more commensurate with the size of the village. As explained in, for example, the Green Belt Exceptional Circumstances Topic Paper (GBD4) the scale of housing needs in the borough mean that development at the borough's main rural settlements is considered to be necessary. The scale of allocations at individual settlements reflects the availability of land and constraints including (amongst other things) school place capacities, heritage and landscape. Wolvey is relatively less constrained in terms of school capacity, heritage and landscape constraints and land availability than some of the other main rural settlements.

Issue	Loss of Green Belt land contrary to national policy
Who raised the issue	Evans, Elizabeth; Henry, C D and L A; James , Charles; James, Catharine; Pare, Jennifer; Pare, Matthew; Spencer, June; Court, Gerry & Carol; Griffin, Colin; Jones, David; Jones, Barbara; Ling, Philip; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Connearn, Michael; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Bassett, Graham; White, Claire; White, Garrie; Nycz, Janina; Billington, Glynis; Chrimes, Brian; Wiltshire, Lindsay; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Bates, David; Matts, Sandra; Matts, Charlie; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; West, Annette; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Coope, Joanne; Webb, Jacqueline; Moore, Diane; Tritax Big Box Developments Ltd (Site 17); Fisher, Hilary; Callery, Ruth; Fisher, Michael; Maoudis, Rebecca; Hilliard, Sharon; Lovett, Anne; Lovett, Peter; Lee, Joanne; Hudson, Patricia; Hudson, Giles; Myers, Ann
No. raising the issue	99
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt.

Issue	Ecological harm and loss of local habitats and open space
Who raised the issue	Evans, Elizabeth; Henry, C D and L A; James , Charles; McDonagh, Judith; McDonagh, Terry; Higginson, Helen; Gronow, Yvonne; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Russell, Pauline; Bassett, Graham; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Bates, David; Matts, Sandra; Matts, Charlie;

	Morley, Thomas; Morley, Victoria; West, Annette; Webb, Jacqueline; Miller, Stuart; Moore, Diane
No. raising the issue	44
Council response	This site did not meet the threshold for ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. A site-specific ecology assessment will be required at application stage. The site currently has no public access, so the allocation is not thought to result in harmful loss of open space.

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. Unsustainable location due to need to drive to access services
Who raised the issue	James , Charles; James, Catharine; Pare, Jennifer; Pare, Matthew; Keogh, Damian; Court, Gerry & Carol; Spencer, June; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crispin, Elizabeth; Brown, Natalie; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Baker, Michael; Baker, Irene; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Bassett, Graham; White, Claire; Tarrant, John; White, Garrie; Pitt, Michelle; Billington, Glynis; Chrimes, Brian; Trevelyan, Michael; Bilton Grange School; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Bates, David; Matts, Sandra; Matts, Charlie; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Morley, Thomas; Morley, Victoria; West, Annette; Mr and Mrs Hudson; Beales, Dominic; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Beales, Katherine; Kang, Jane; Critchley, P; Coope, Joanne; Webb, Jacqueline; Miller, Stuart; Collins, Sarah; Collins, Michael; Billington, Richard; Moore, Diane; Lambert and Ellis, Vanessa and Gordon; Ward, John; Walker, Robert Scott; Coope, Neal; Fisher, Hilary; Callery, Ruth; Fisher, Michael; Maoudis, Rebecca; Kelly, Patrick and Linda; Sheffield, Andy; Downes, Steve and Allyson; Hilliard, Sharon; Lovett, Lorna; Lovett, Peter; Lee, Joanne; Myers, Robert; Leeding, Marion; Jones, Caryl
No. raising the issue	125
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. There are day-to-day services available within the village such as a primary school, GP provision, small convenience store and two pubs.

	Bus routes connect to the hospital and services in Coventry, and to Nuneaton.

Issue	Effect of extra traffic on road infrastructure and issues with on-street parking
Who raised the issue	West, David; Jones, Christina; West, Annette
No. raising the issue	3
Council response	The Strategic Transport Assessment (I3) did not identify any significant impacts arising from this allocation. The development will need to comply with the parking standards set out in Appendix 2 of the Local Plan document which will make provision for new occupants of the development. The proximity of the site to village services means a significant increase in demand for on-street parking in the village is not anticipated.

Issue	Potential for flooding increased
Who raised the issue	West, David; Matts, Sandra; Matts, Charlie; Morley, Thomas; Morley, Victoria; West, Annette; Miller, Stuart
No. raising the issue	7
Council response	The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) found the site to be at low risk of flooding and is not anticipated to increase flooding elsewhere. Further site-specific flood risk assessments would be required at application stage.

Issue	Location is on prime productive farmland
Who raised the issue	Woolford, Wayne; Billington, Richard
No. raising the issue	2
Council response	The site is grade 3 agricultural land and is not considered Best and Most Versatile. The scale of land being developed (2.27ha) is low.

Issue	Reduction in quantum of development from Preferred Option plan is unjustified
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	We disagree. However, the requirement is for the council to demonstrate that the proposed submission plan is an appropriate strategy based on proportionate evidence. There is not a requirement to justify changes from previous stages of plan-making. It was always made clear that options identified at preferred options stage were a work in progress and subject to change based on responses to the consultation and the gathering

	of additional evidence.
	The reduction in quantum of development compared to the preferred options stage is based on a reduced housing requirement (as a result of a reduced plan period), an increase in allocations on town centre brownfield sites, and new allocations proposed elsewhere in the borough. The resulting plan is considered justified.

4.65. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Reduce allocation to only include the conversion of existing farm buildings	King, Thelma
Extension to existing 30mph zone required	Warwickshire County Council
Allocate the full site as per the Preferred Option Local Plan	Rosconn Group
Amend the allocation to align with Marrons proposal, as accepted by Wolvey Parish Council	Allanach, Richard
Council response to modification proposals: Reduction of the allocation would mean a substantially reduced housing delivery and there are not clear reasons why this change is needed on soundness grounds. Specific highways considerations can be addressed at application stage. The reasons for reducing the scale of the site allocation compared to the preferred options stage are summarised above. The Marrons proposal referred by Richard Allanach to was first submitted in response to the Regulation 19 consultation although incorporates land previously submitted as part of a larger site in response to the earlier call for sites. This is an omission site. The council considers that there are not clear soundness reasons to modify the plan to allocate this omission site.	

SITE 309 LAND NORTH OF B4109, WOLVEY

4.66. 206 representations on behalf of 212 people or organisations argued that the allocation of site 309 is unsound. One person argued the allocation is sound. The following main issues were raised with this site allocation:

Issue	Harm to village identity and quiet rural character through inappropriate and disproportionate level of growth
Who raised the issue	Evans, Elizabeth; Dhadwal, Sandeep; Harris, Corrie; James, Charles; Warwick, Adrian; Warwick, Julie; Wilson, Robert; James, Catharine; Wolvey Parish Council; Smith, David; Pare, Jennifer; Pare, Matthew; Keogh, Damian; Court, Gerry & Carol; Spencer, June; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Brannigan, Jonathon; Dhadwal, Alicja; McDonagh, Judith; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan;

	Suckling, Karen; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Hawkins, Rachel; Bassett, Graham; White, Claire; White, Garrie; Nycz, Janina; Pitt, Janina; Chrimes, Brian; Bilton Grange School; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Coton Park East Committee; Bates, David; Matts, Sandra; Matts, Charlie; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Hopkins, Matthew; West, Annette; Gillman, Sarah Elizabeth; Mr and Mrs Hudson; Beales, Dominic; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Beales, Katherine; Coope, Joanne; Silvester, William; Webb, Jacqueline; Miller, Stuart; Moore, Diane; Bassnett, Susan; Gillman, Keith Neville; Reeve, Michael David; Ward, Jane; Fisher, Hilary; Fisher, Michael; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Bearne, Andrew; Kelly, Patrick and Linda; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Hilliard, Sharon; Bates, Malcolm; Lovett, Lorna; King, Andrew; King, Alison; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Hall, William; Hall, Adrian; Hall, Susan; Hall, Ned; Hall, Ian (2); Lee, Joanne; Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Marian; McCormack, Neil; Chadwick, Anne-Marie; Bailey, Deirdre; Wiltshire, Melanie; Pitt, Michelle
No. raising the issue	196
Council response	The quantum of development at Wolvey has been substantially reduced since Regulation 18 and now totals 210 dwellings across both sites. This is thought to be more commensurate with the size of the village. As explained in, for example, the Green Belt Exceptional Circumstances Topic Paper (GBD4) the scale of housing needs in the borough mean that development at the borough's main rural settlements is considered to be necessary. The scale of allocations at individual settlements reflects the availability of land and constraints including (amongst other things) school place capacities, heritage and landscape. Wolvey is relatively less constrained in terms of school capacity, heritage and landscape constraints and land availability than some of the other main rural settlements.

Issue	Loss of Green Belt land contrary to national policy
Who raised the issue	Evans, Elizabeth; Henry, C D and L A; Farmer, Antony; Harris, Corrie; James, Charles; Warwick, Adrian; Warwick, Julie; Wilson, Margaret; Wilson, Robert; Wolvey Parish Council; Smith, David; Pare, Jennifer; Pare, Matthew; Spencer, June; Court, Gerry & Carol; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Brannigan, Jonathon; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Connearn, Michael; Jones, Christina; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Hawkins,

	Rachel; Bassett, Graham; White, Claire; White, Garrie; Nycz, Janina; Chrimes, Brian; Wiltshire, Lindsay; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Coton Park East Committee; Matts, Sandra; Matts, Charlie; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Billington, Richard; West, Annette; Beales, Dominic; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Beales, Katherine; Coope, Joanne; Silvester, William; Webb, Jacqueline; Moore, Diane; Bassnett, Susan; Gillman, Keith Neville; Reeve, Michael David; Ward, John; Ward, Jane; Fisher, Hilary; Fisher, Michael; Wells, Richard; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Bearne, Andrew; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Hilliard, Sharon; Bates, Malcolm; Lovett, Alex; Lovett, Anne; King, Andrew; King, Alison; Bailey, Andrew; Briggs, Georgina; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Hall, William; Hall, Adrian; Hall, Susan; Hall, Ned; Hall, Ian (2); Lee, Joanne; Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Marian; McCormack, Neil; Chadwick, Anne-Marie; Bailey, Deirdre; Wiltshire, Melanie; Pitt, Michelle; Pitt, Janina
No. raising the issue	206
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt.

Issue	Ecological harm and loss of local habitats and open space. No full ecological survey conducted despite proximity to Local Wildlife Site (LWS)
Who raised the issue	Evans, Elizabeth; Hughes, Donna; Henry, C D and L A; Harris, Corrie; James , Charles; James, Catharine; Wolvey Parish Council; Smith, David; Pare, Jennifer; Pare, Matthew; Spencer, June; Court, Gerry & Carol; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Brannigan, Jonathon; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Wolvey Wetland Trust; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Suckling, Karen; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Connearn, Michael; Jones, Christina; Goffin, Catherine; Russell, Pauline; Black, John; Hawkins, Rachel; Bassett, Graham; White, Claire; White, Garrie; Nycz, Janina; Pitt, Janina; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Coton Park East Committee; Bates, David; Matts, Sandra; Matts, Charlie; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Billington, Richard; Morley, Thomas; Morley, Victoria; Hopkins, Matthew; West, Annette; Gillman, Sarah Elizabeth; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Coope, Joanne; Silvester, William; Silvester, Margaret; Webb, Jacqueline; Miller, Stuart;

	Moore, Diane; Bassnett, Susan; Gillman, Keith Neville; Reeve, Michael David; Lambert and Ellis, Vanessa and Gordon; Reeve, Kathleen; Bassnett Barker, Rosanna; Ward, Jane; Nixon, Clare; Fisher, Hilary; Fisher, Michael; Wells, Richard; Maoudis, Rebecca; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Bearne, Andrew; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Kelly, Patrick and Linda; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Hilliard, Sharon; Bates, Malcolm; Lovett, Alex; King, Andrew; King, Alison; Briggs, Georgina; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Hall, William; Hall, Adrian; Hall, Susan; Hall, Ned; Hall, Ian (2); Lee, Joanne; Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Marian; McCormack, Neil; Chadwick, Anne-Marie; Bailey, Deirdre; Wiltshire, Melanie; Pitt, Michelle; Allanach, Richard
No. raising the issue	216
Council response	The site is adjacent to a potential LWS which is a site that has been nominated but not yet surveyed or assessed to consider whether it is suitable for designation. The site therefore did not meet the threshold for the ecological constraints assessment because it is not in close proximity to a designated wildlife site and is not recorded as having a significant proportion of high distinctiveness habitats on site. Further ecology assessments will be required at application stage. The development requirements for the site include the following “Delivery of a landscape buffer on the site’s northern boundary to soften views from the Anker Valley and be the focus for ecological enhancements alongside the Anker Meadows Local Green Space and River Anker floodplain.”. There are no ecology-based soundness issues with this allocation.

Issue	Site was found to have high landscape sensitivity in 2016 assessment, and the area has not changed since
Who raised the issue	James , Charles; Warwick, Adrian; Warwick, Julie; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Spencer, June; Court, Gerry & Carol; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Brannigan, Jonathon; Dhadwal, Alicja; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Connearn, Michael; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Hawkins, Rachel; Bassett, Graham; White, Claire; White, Garrie; Nycz, Janina; Pitt, Janina; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Coton Park East Committee; Bates, David; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Gillman, Sarah Elizabeth; Beales, Dominic; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Beales, Katherine; Coope, Joanne; Webb, Jacqueline; Moore, Diane; Gillman, Keith

	Neville; Reeve, Michael David; Reeve, Kathleen; Ward, Jane; Fisher, Hilary; Fisher, Michael; Maoudis, Rebecca; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Bearne, Andrew; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Kelly, Patrick and Linda; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Bates, Malcolm; Lovett, Lorna; Lovett, Peter; King, Andrew; King, Alison; Briggs, Georgina; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Hall, William; Hall, Adrian; Hall, Susan; Hall, Ned; Hall, Ian (2); Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Marian; McCormack, Neil; Chadwick, Anne-Marie; Bailey, Deirdre; Wiltshire, Melanie; Pitt, Michelle
No. raising the issue	192
Council response	The Landscape Sensitivity Assessment for smaller sites (SS22) found the site to have medium/low sensitivity due to the enclosure from hedgerows and concentration of trees along the boundary of the River Anker. The plan is based on current evidence – even if the site may not have substantially changed since 2016, all sites were assessed from scratch in 2025 to provide up-to-date evidence. This work was reviewed by independent specialists at Lepus (SS23) who concurred with its findings. The development requirements for this site include delivery of a landscape buffer on the northern boundary to soften views from the Anker Valley, with hedgerows retained to the south along the B4109.

Issue	Insufficient local infrastructure (schools, hospitals etc) to support new housing. Unsustainable location due to need to drive to access services - ranked the least sustainable village
Who raised the issue	Farmer, Antony; Harris, Corrie; James , Charles; Warwick, Adrian; Warwick, Julie; Wilson, Margaret; Wilson, Robert; James, Catharine; Wolvey Parish Council; Smith, David; Pare, Jennifer; Pare, Matthew; Keogh, Damian; Court, Gerry & Carol; Spencer, June; Griffin, Colin; Ling, Philip; Jones, David; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Upton, Tom & Mary; Penman, Judith; Hilliard, Robert; Brannigan, Jonathon; Winterburn, Gillian; Winterburn, Stephen; McDonagh, Judith; McDonagh, Terry; Hannant, Susanne; Higginson, Helen; Gronow, Yvonne; Hawkins, John; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; West, David; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes, Michael; Wykes, Janet; Hawkins, Angela; Fitzgerald, Elizabeth; Woolford, Wayne; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Suckling, Karen; Leach, Wendy; Cox, Roger; King, Catherine; King, Elizabeth; King, Gerald; King, Martin; Connearn, Michael; Baker, Michael; Baker, Irene; Goffin, Catherine; Cortizo, Dominic; Russell, Pauline; Black, John; Hawkins, Rachel; Bassett, Graham; White, Claire; Tarrant, John; White, Garrie; Nycz, Janina; Pitt, Michelle; Pitt, Janina; Billington, Glynis; Chrimes, Brian; Trevelyan, Michael; Bilton Grange School; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Coton Park East Committee; Bates, David; Matts, Sandra; Matts, Charlie; Mr and Mrs Wheeler the landowner of Land west of Medda Place; Walsh, Lisa; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Billington, Richard; Morley, Thomas; Morley, Victoria; Hopkins, Matthew; West, Annette; Gillman, Sarah Elizabeth; Mr and Mrs Hudson;

	Beales, Dominic; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Beales, Katherine; Kang, Jane; Critchley, P; Coope, Joanne; Silvester, Margaret; Webb, Jacqueline; Miller, Stuart; Collins, Sarah; Collins, Michael; Moore, Diane; Bassnett, Susan; Gillman, Keith Neville; Reeve, Michael David; Lambert and Ellis, Vanessa and Gordon; Reeve, Kathleen; Coope, Neal; Nixon, Clare; Fisher, Hilary; Fisher, Michael; Wells, Richard; Maoudis, Rebecca; Evans, Leonard; Evans, Jill; Bassett, Philip; Bassett, Ann; Bearne, Andrew; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Kelly, Patrick and Linda; Evans, Rachel; Hughes, Anne; Evans, Ben; Sheffield, Andy; Evans, Millie; Evans, Mark; Downes, Steve and Allyson; Hilliard, Sharon; Bates, Malcolm; Lovett, Lorna; Lovett, Alex; Lovett, Peter; King, Alison; Briggs, Georgina; Simpson, Marjorie Anne; Simpson, Paul Martin; Simpson, Gregory Mark; Woolford, Helen; Worthington, Elena; Worthington, Philip; Worthington, Lucas; Worthington, Emily; Hall, William; Hall, Adrian; Hall, Susan; Hall, Ned; Hall, Ian (2); Lee, Joanne; Brook, Michelle; Brook, Alan; Hurley, Ivy; Brook, Laura; Brook, Stephen; Brook, Rebecca; Brook, Christopher; Mitchell, Marian; McCormack, Neil; Myers, Robert; Leeding, Marion; Chadwick, Anne-Marie; Bailey, Deirdre; Wiltshire, Melanie; Pitt, Michelle; Jones, Caryl
No. raising the issue	237
Council response	The site selection process considered infrastructure requirements and involved consultation with relevant infrastructure providers including the local education authority, local highways authority, Integrated Care Board (NHS) and Severn Trent Water. Additional infrastructure required to support development in the plan is set out in the Infrastructure Delivery Schedule (I2). Specific contributions to individual infrastructure upgrades would be assessed at planning application stage by the relevant infrastructure provider and secured through Policy I4. There are day-to-day services available within the village such as a primary school, GP provision, small convenience store and two pubs. Bus routes connect to the hospital and services in Coventry, and to Nuneaton.

Issue	Site is likely at risk of flooding and potential for flooding elsewhere increased - existing developments already causing flooding, sewer capacity is insufficient & this site is below the sewer, requiring pumping
Who raised the issue	Crispin, Elizabeth; West, David; Hilliard, Robert; Suckling, Karen; Jones, Christina; Hawkins, Rachel; Matts, Sandra; Matts, Charlie; Morley, Thomas; Morley, Victoria; Hopkins, Matthew; West, Annette; Gillman, Sarah Elizabeth; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Miller, Stuart; Gillman, Keith Neville; Reeve, Michael David; Reeve, Kathleen; Wells, Richard; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Evans, Rachel; Hughes, Anne; Evans, Ben; Evans, Millie; Evans, Mark; Hilliard, Sharon; Lovett, Alex; Lovett, Peter; Lee, Joanne
No. raising the issue	44
Council response	The Strategic Flood Risk Assessment (SS9) and sequential test (SS14) show that 99.8% of the site lies within Flood Zone 1 (low risk of fluvial flooding). The site also has low surface

	water flood risk. Further flood assessments would be required at application stage and must show that flood risk would not increase elsewhere. The Stage 2 Water Cycle Study found the site would have a medium potential impact on the sewerage infrastructure and a low impact on the surface water sewerage infrastructure. Sewerage infrastructure is not identified in the Water Cycle Study as a constraint to the development of the site.

Issue	Effect of extra traffic on road infrastructure and issues with on-street parking
Who raised the issue	Crispin, Elizabeth; West, David; Jones, Christina; Hawkins, Rachel; Hopkins, Matthew; West, Annette; Gillman, Sarah Elizabeth; Ferguson, Nicola; Ferguson, Angus; Ferguson, Daniel; Jackson, Lisa; Jackson, Harvey; Jackson, Emily; Bassnett, Susan; Gillman, Keith Neville; Reeve, Michael David; Lovett, Lorna
No. raising the issue	17
Council response	The Strategic Transport Assessment (I3) did not identify any significant impacts arising from this allocation. The development will need to comply with the parking standards set out in Appendix 2 of the Local Plan document which will make provision for new occupants of the development. The proximity of the site to village services means a significant increase in demand for on-street parking in the village is not anticipated.

Issue	Location is on prime productive farmland
Who raised the issue	Woolford, Wayne
No. raising the issue	1
Council response	Most of the site is grade 3 agricultural land and is not considered Best and Most Versatile. Only a small proportion is grade 2. The site area is low.

Issue	Water supply to and drainage from the development cannot be guaranteed
Who raised the issue	Gillman, Sarah Elizabeth; Gillman, Keith Neville; Reeve, Michael David; Reeve, Kathleen
No. raising the issue	4
Council response	The Stage 2 Water Cycle Study (I10) identified a shortfall in water supply capacity at Wolvey with improvements needed, including an upgrade to the Bramcote Wolvey Booster Station and new mains. This scheme is set out in the Infrastructure Delivery Schedule (I2) and will be delivered by Severn Trent Water as part of ongoing upgrade works. The Stage 2 Water Cycle Study (I10) found there to be low potential impact of this site on the surface water sewer system i.e. drainage.

Issue	No safe access points to the site
Who	Reeve, Kathleen

raised the issue	
No. raising the issue	1
Council response	Vehicular access is proposed from the B4109 – the specific access arrangements will be determined at application stage and subject to highways consultation. Pedestrian and cycle access will be from Hall Lane. It is considered that safe access will be achievable.

4.67. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Potential connection to Bulkington Road cul-de-sac	Warwickshire County Council
Amend second development requirement to clarify that PRow retention only applies within the site boundary, and diversions are also acceptable where a preferred solution can be delivered	Places for People
Amend fifth development requirement to permit loss of hedgerow when allowing for access	Places for People
Council response to modification proposals: The current development requirements are designed to ensure a high-quality and sustainable outcome at this site. Further connection options can be considered at application stage as part of the site layout. It is implicit in the fifth bullet point when read in conjunction with the first bullet point that removal of the hedgerow to facilitate the creation of the access is permissible and necessary. No modification is therefore necessary to address this point.	

RESIDENTIAL SITE ALLOCATIONS IN RESPONSE TO WHICH NO MAIN ISSUES OR RECOMMENDED MODIFICATIONS WERE RAISED

4.68. No representations received pursuant to Regulation 20 commented specifically on the soundness of the following proposed residential allocations:

62 Morgan Sindall House, Rugby
 332 Albert Street, Rugby
 355 Land adjacent to 44 Craven Road, Rugby
 294 Land adjacent 9 Railway Terrace, Rugby
 356 The Railings (NHS) Rugby
 357 28-29 High St, Rugby
 352 Former snooker hall, Railway Terrace
 349 Land to rear of Albert St, Rugby

POLICY S7 EMPLOYMENT ALLOCATIONS

4.69. 31 representations on behalf of 143 people or organisations argued that policy S7 is unsound.

Three representations on behalf of three people or organisations argued that the policy is sound. The following main issues were raised with Policy S7. The main issues raised in respect of each of the proposed employment site allocation in the Proposed Submission Local Plan are given beneath the general comments.

- 4.70. Some respondents completed the representation form to comment only on the soundness of a specific site allocation and not Policy S7 overall. These representations are counted against the individual site allocations below but not against S7. As site allocations are listed in S7, this means that a higher number of respondents objected to S7 than is captured in the numbers above.

Issue	Policy S7 is unsound because it does not allocate an omission site.
Who raised the issue	Windsor Developments Limited; Manse Opus and Sir Thomas Whire's Charity; S&D Postlethwaite; Barberry Ansty Limited; Manse Opus and Rolls Royce Plc; Mr N Williams and Miss E Williams the landowners of Land at Mill House, Dunchurch ; Prologis UK Limited; Mountpark Logistics EU Sarl; Tarmac Trading Ltd; BARJANE; Catesby Estates; Stoford Properties Ltd; Taylor, Jenna; Windsor Developments (Site 145); Ashfield Land; Swanvale Developments Ltd; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes; Richborough Commercial (M45 J1); Warwickshire Property and Development Group (site 18); Mitchell, Stuart; Green, Daniel
No. raising the issue	26
Council response	This argument was framed in different ways by different promoters, often focussing on the relative merits of omissions sites versus proposed allocations and how these were assessed through the site selection process and Sustainability Appraisal. The council has undertaken a clear and logical site selection process which is explained in the Spatial Strategy and Site Selection Methodology Summary (SS1). That process necessarily involved a range of judgements made by planning officers. It is certain that some omission site promoters will wish to dispute that evidence, potentially in some cases on a line by line basis challenging every micro judgement made therein. It will be for the inspectors to determine whether examination time should be used for this. It is noted that para 5.15 of the Procedure Guide for Local Plan Examinations states “the merits of sites not allocated in the submitted plan (known as “omission sites”) will not normally be discussed at the hearing sessions. This is because the focus of the examination is on the soundness of the submitted plan”.

Issue	Reliance on large allocations with significant infrastructure requirements creates delivery risk
Who raised the issue	Windsor Developments Limited; Windsor Developments (Site 145)
No. raising the issue	2
Council response	The borough has high demand as an industrial and logistics location. This type of development is very viable in the borough.

	The track record is of employment sites, even those requiring significant on-site infrastructure, being built out quickly. The development consent order for the Walsgrave A46 junction – needed for the Crowner Fields Farm and Walsgrave Hill sites - has been confirmed and this is funded. The Strategic Transport Assessment (document I3-I6) provides details of the other off-site transport infrastructure requirements. There are no impediments to the site allocations coming forward, and therefore no significant delivery risks.

Issue	Inadequate provision for smaller/medium sized units (particularly freehold)
Who raised the issue	Windsor Developments Limited; S&D Postlethwaite; Barberry Ansty Limited; Richborough Commercial (M45 J1)
No. raising the issue	5
Council response	A similar issue was identified under Policy S3. Although the evidence base combines a need for strategic sites and a 'local' need for smaller units, a single industrial land requirement is set. Large units are built on small sites and vice versa. Setting different requirements for smaller and larger buildings would create a planning policy that would be impossible to implement and monitor, given that local plans and DM decisions seldom determine the specific size of units that can be built on sites, which is generally market-led. There is, however, clearly a quantitative and qualitative identified demand for smaller units. In response to this, the plan specifically requires smaller units to be delivered on the sites at Coton Park East and Walsgrave Hills. Several representors argue that (smaller) omission sites should be allocated in place of the plan allocations because they are more likely to be developed for smaller units. However, it is not the case that small sites = small units. There are numerous examples in the borough of small sites being developed for large units. The tenure of units (leasehold versus freehold) is not something planning policies can control.

Issue	Site 95 Crowner Fields Farm is a "closed site"/named operator site therefore not generally available to occupiers. The same applies to Padge Hall farm (this site is a commitment, and this point was raised by Stoford). Therefore, they shouldn't form part of the supply
Who raised the issue	Manse Opus and Sir Thomas Whire's Charity; Barberry Ansty Limited; Mountpark Logistics EU Sarl; Stoford Properties Ltd; SEGRO

No. raising the issue	5
Council response	Paragraphs 3.49-3.53 of the Development Needs Topic Paper (SD11) provide the council's response to this point in relation to Crowner Fields Farm. The same applies to Padge Hall Farm. Stoford argue this should be removed from the supply because it is pre-let to a named occupier. The site is being developed for employment use. It therefore still meets strategic requirements; pre-let is very common with strategic units and units subject to pre-lets should not be discounted. Stoford's argument appears to be that only speculatively built units with no end user identified can count as part of the employment land supply. Units with identified occupiers should all be discounted. This would make monitoring a planning policy impossible.

Issue	Allocated sites will not provide sufficient provision for B8 logistics development to meet regional market demand - sites 95 and 14 will not supply open B8 floorspace
Who raised the issue	SEGRO
No. raising the issue	1
Council response	This is a similar argument to the previous one. The local plan does not allocate sites based on their intended occupiers and whether they are 'open' or not. On the wider point, the level of land allocation proposed would meet the assessed strategic need for opportunity area 7.

Issue	Previously developed land and/or grey belt should be prioritised ahead of non-grey green belt sites
Who raised the issue	S&D Postlethwaite; Prologis UK Limited; BARJANE
No. raising the issue	3
Council response	This point was considered in the Green Belt Exceptional Circumstances Topic Paper. Although claimed by site promoters to be grey belt, neither of the sites put forward by S&D Postlethwaite or BARJANE are in a part of the Green Belt defined as provisionally grey belt in the Stage 1 Green Belt study (GBD1). In relation to the point raised by Prologis, the fact that a relatively small part of a largely greenfield, green belt site is PDL while one relevant factor is not considered to be an overriding reason why that site should be prioritised.

Issue	S7 is unsound because it allocates Green Belt sites, while other available, suitable and achievable sites are not allocated. Exceptional circumstances not demonstrated as all other reasonable alternatives not examined.
Who raised the issue	Mr N Williams and Miss E Williams the landowners of Land at Mill House, Dunchurch; CPRE; Stoford Properties Ltd; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising the issue	8
Council response	The council's position on Green Belt exceptional circumstances is set out in the Green Belt Exceptional Circumstances Topic Paper (document GB4). This document explains the thorough examination of reasonable alternatives that has been undertaken, including through the Sustainability Appraisal.

Issue	Policy not justified because of issues with the Strategic Transport Assessment modelling Toll Bar End and in consideration in SA growth scenario 2
Who raised the issue	Prologis UK Limited; Mountpark Logistics EU Sarl
No. raising the issue	2
Council response	This is an issue raised by omission site promoters of the Ryton West site in relation to the consideration of that site in the Strategic Transport Assessment (STA). That site was identified as a preferred option as part of the Regulation 18 consultation but was omitted after the Strategic Transport Assessment identified significant impacts at the Toll Bar End junction. The site promoters' argument is that the impacts of the scheme on that junction should have been modelled using the Kenilworth and Southam Wide Area (KSWA) model rather than using the Rugby Rural Area Model (RRAM). They state that the KSWA better reflects the operation of Toll Bar End following recent changes as part of the Coventry Gateway South development. They argue that the Sustainability Appraisal report's consideration of the growth scenario including the Ryton West site should be amended to (amongst other things) score the site more positively for transport impact. In response to this comment the council has instructed SLR to consider the sites raised on behalf of Prologis and model the impact of the Ryton West omission site and the proposed allocation at Walsgrave Hill (as alternatives) in the KSWA model. The results of that are summarised in document I14. These results support the conclusions reached in the original STA and therefore the Sustainability Appraisal.

Issue	Replacement for the overcalculated supply at Coventry Gateway South should be as close to Toll Bar End as possible

Who raised the issue	Tarmac Trading Ltd
No. raising the issue	1
Council response	The Alignment Paper Addendum (2025) corrected an error in the WMSESS in calculating the employment land supply at Coventry Gateway South (in Warwick District). The addendum recommended that an additional 50ha in supply in opportunity area 7 (M6 / A45 / A46 / M45 Coventry & Rugby). We disagree with this comment. It is important to remember that WMSESS need is derived from the WMSESS study area (i.e. most of the West Midlands region) as a whole, it is then indicatively apportioned by the WMSESS to individual opportunity areas. In this context, the individual location of sites within the opportunity areas is not a factor in the employment needs evidence base. Therefore, there is no particular reason why this need should be re-provided close to Toll Bar End.

Issue	Allocation of employment sites doesn't align with policy S1 settlement hierarchy as it is not focussed on the town of Rugby. Allocations on edge of Coventry don't align with S1 statement there should be only limited development in countryside.
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The supporting text for Policy S1 at para 1.18 is clear that the Coventry urban fringe sits outside of the settlement hierarchy. The overarching strategy is summarised in paras 1.8-1.13 on pages 9-10 of the plan. Greater detail is set out in the Green Belt Exceptional Circumstance Topic Paper (GBD4). There is no misalignment.

Issue	In applying para 147-148 NPPF the council has wrongly given weight to the disadvantages of non-Green Belt options
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	Paragraphs 147-148 require, before concluding the exceptional circumstances exist to justify changes to Green Belt boundaries, the council to have examined fully all reasonable options. Paragraph 148 states that in reviewing Green Belt boundaries the need to promote sustainable patterns of development should determine whether a site's location is appropriate, and that "Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban

	areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”. Although not explicitly stated in the NPPF, the council considers that fully examining reasonable non-Green Belt options would include looking at their advantages and disadvantages. Similarly, considering the consequences for sustainable development of channelling development towards locations beyond the outer Green Belt boundary requires consideration of the disadvantages of that option. As a more general point, the council considers that the disadvantages of non-Green Belt options can form part of the exceptional circumstances for Green Belt release.

Issue	Allocations on the edge of Coventry are unsustainable, and the allocations overconcentrate employment land on the edge of Coventry and this will be damaging to the economic prosperity of Rugby Town. Logistics-based clustering on the edge of Rugby should be favoured, this could also deliver B2.
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The council disagrees. For the reasons set out in the Green Belt Exceptional Circumstances Topic Paper (GBD4) the council considers the opposite to be true and that delivering a significant part of the requirement for employment land on the edge of Coventry is the most sustainable option. Given the allocations at Rugby in the plan (Coton Park East and South West Rugby) coupled with the proposal in the recently consulted on West Northamptonshire Local Plan to deliver a phase IV of DIRFT with 106ha of employment development close to the edge of the town of Rugby, there will be no shortage of employment development at Rugby during the plan period. The large planned expansion of Magna Park Lutterworth (in Harborough District) should also be considered. As is explained in the topic paper, the opportunities for manufacturing and R&D uses are higher on the edge of Coventry than north of Rugby on the A5 which with DIRFT and Magna Park is a logistics focussed location.

Issue	Allocations on the edge of Coventry to seek to deliver diversification beyond B8 contradict evidence base that shows greatest need is for B8. In any event diversification can be delivered elsewhere.
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council	WMSESS states that there should in opportunity area 7 be 2-3 larger B8/mixed sites of

response	circa 50ha and 1-2 smaller B2/B1 sites of circa 25ha. It is therefore envisaged in the evidence sites that sites may be “mixed” and achieving that mix (i.e. diversification) is an objective of the plan and the council’s Economic Strategy (SD17). Accordingly, there is no contradiction.

4.71. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Include omission site	S&D Postlethwaite; Tarmac Trading Ltd; BARJANE; Catesby Estates; Windsor Developments (Site 145); Swanvale Developments Ltd; RBC Conservative Group; Mitchell, Stuart
Remove Green Belt allocation and replace it with non-Green Belt omission site.	Mr N Williams and Miss E Williams the landowners of Land at Mill House, Dunchurch
Allocate Site 17 for 130,000sqm of employment floorspace as was proposed at the Preferred Option stage.	Tritax Big Box Developments Ltd (Site 17)
Council response to modification proposals: The modifications proposed for this policy primarily relate to the combination of sites selected for allocation. This has been addressed under the main issues for S7 and for individual sites below.	

SITE 64 COTON PARK EAST

4.72. 52 representations on behalf of 641 people or organisations argued that the allocation of site 64 is unsound. One representation on behalf of one person or organisation argued that the allocation is sound. The following main issues were raised with this site allocation:

Issue	No clear need for this level of employment allocation - questions over validity of WMSESS, many warehouses are empty
Who raised the issue	Willis, Mark; Rugby Free Primary school; Cooper, Clive; Sandra, Sandra; Hinchliffe, Nick; Timms, Livia; Varma, Chaitanya; Coton Park residents group; Stuart, Laura; Allanach, Richard
No. raising the issue	560
Council response	This issue is essentially the questioning of the evidence base for Policy S3, and similar issues are raised in relation to that policy. The council, as it is required by national policy to do, has collected evidence of projected future need for employment land both at a local and sub-regional/regional level. This evidence is reflected in the level of employment in the submission local plan.

Issue	Loss of green open space with landscape and environmental impacts
Who raised the issue	Stephen, Hannah; Sandra, Sandra; Timms, Livia; Varma, Chaitanya; Rusgrove, Amanda; Coton Park residents group; Stuart, Laura; Sharma, Nishtha; Awotunde, Oladapo
No. raising the issue	559
Council response	The site is currently undeveloped, but it is not public open space. The landscape and ecological sensitivity of the site was considered in the evidence base (see documents SS20-23 and SS25-27). The site was identified as having medium ecological constraints and medium/low landscape sensitivity. It is important to note that the site benefits from an extant outline planning permission for residential development and has been allocated for development since 2019.

Issue	Impact on nearby residential properties - including noise, traffic, light and amenity. Insufficient consideration of co-locating incompatible land uses.
Who raised the issue	Rafe, Joanna; Cooper, Clive; Willin, Janice; Pritchard, Ryan; English, David; Clark, Dagmar; Hall, Gail; Twynholm, Gary; Ash, Lisa; Stephen, Hannah; Large, Claire; Sandra, Sandra; Hinchliffe, Nick; Huang, Wei; Timms, Livia; Ward, Steve; Smith, Jane; Jennings, Ross; Rusgrove, Amanda; Scott, Grant; Jenkins, Ellen; Twining, Carrie; Stuart, Laura; Campbell, Nicholas; Sharma, Nishtha; Devendar, Abhishekh; Fatania, Kalpesh; Tucker, Andrew; Awotunde, Oladapo; Page, Thomas; Vasudev, Divya; Clark, Peter; Dexter, Malcom; Allanach, Richard
No. raising the issue	35
Council response	The impact on neighbouring residential properties is specifically highlighted in the development requirements for the site. The design code to be prepared for the site would further consider this, as would the planning application process.

Issue	Highway impacts (congestion, safety and road condition) including the A426, M6 junction 1 and A5 Gibbets Cross with lack of mitigation strategy
Who raised the issue	Mehta, Lynne; Mehta, Kamalgupt; Rugby Free Primary school; Redhead-Holroyd, Thomas; Redhead-Holroyd, Jessica; Cooper, Clive; Naish, Murray; Coton Park East Committee; Twynholm, Gary; Stephen, Hannah; Timms, Livia; Varma, Chaitanya; Smith, Jane; Morris, Diane; Jennings, Ross; Coton Park residents group; Dixon, Chris; Scott, Grant; Sharma, Nishtha; Devendar, Abhishekh; Tucker, Andrew; Awotunde, Oladapo; Dexter, Malcom; Davis, Ian; O'Connell, Mark; Allanach, Richard
No. raising the issue	614
Council response	The extent of impacts at these junctions is considered in the Strategic Transport Assessment (STA documents I3-I6). Specific mitigations are identified in the STA.

	Coton Park East has an existing residential allocation and permission and is therefore included in the 2042 local plan reference case (i.e. the STA baseline). Trips associated with this existing permission are removed from the 2042 local plan scenarios tested to avoid double counting. However, this does mean that this allocation is contributing little/no additional traffic in comparison to the baseline.

Issue	Lack of adequate strategic transport modelling for the area and/or STA is flawed because it assumes road schemes will come forward whose status is uncertain.
Who raised the issue	Devendar, Abhishekh; Allanach, Richard
No. raising the issue	2
Council response	This is a similar criticism to the previous issue. It is a criticism of the methodology of the Strategic Transport Assessment (STA documents I3-I6). A426/A5 Gibbet Hill and A426/A4071 Avon Mill are both identified as existing issues in the STA. In relation to the former, paragraph 7.18 of the STA states “At the A426/A5 Gibbet Hill junction the modelling predicts a 10% increase in traffic flows through this junction following the inclusion of the Local Plan (Regulation 19) sites. This increase has been minimised through the spatial strategy, which has omitted large sites that would have the largest impact on this junction. Despite this, a solution will clearly be required at this junction, however, given the existing nature of the impacts, and the distance from most developments being promoted through the plan, it is unlikely that this would be funded by the Local Plan sites.”. National Highways are developing a scheme for Gibbet Hill junction, although this remains at an early stage. The scale of any scheme mean it is unlikely to be fundable through s106. Avon Mill Roundabout is a similar existing problem, with a Warwickshire County Council (WCC) designed scheme for this junction. The specific criticism is that the STA ‘unconstrained’ these junctions (i.e. assumed delivery of a scheme at these junctions) to model the impact of the local plan proposed site allocations. This is considered by WCC, RBC and National Highways to be a reasonable modelling approach. Although the modelling assumes delivery of schemes, the spatial strategy as noted deliberately avoids exacerbating these existing issues. Coton Park East has an existing residential allocation and permission and is therefore included in the 2042 local plan reference case (i.e. the STA baseline). Trips associated with this existing permission are removed from the 2042 local plan scenarios tested to avoid double counting. However, this does mean that this allocation is contributing no/very little additional traffic in comparison to the baseline.

Issue	HGV traffic, congestion, hazards, pollution and noise pose significant threat to safety and wellbeing of children attending Rugby Free Primary School
Who raised the issue	Rugby Free Primary school; Redhead-Holroyd, Thomas; Redhead-Holroyd, Jessica; Smith, Mike; Rewhorn, Colin; Naish, Murray; English, David; Twynholm, Gary; Stephen, Hannah; Sandra, Sandra; Hinchliffe, Nick; Huang, Wei; Timms, Livia; Ward, Steve; Smith, Jane; Rusgrove, Amanda; Coton Park residents group; Dixon, Chris; Coope, Neal; Stuart, Laura; Fatania, Kalpesh; Tucker, Andrew; Awotunde, Oladapo
No. raising the issue	573
Council response	The proposed development requirements for the site include that “Larger units which will be focussed away from the south western corner of the site shall be accessed from Castle Mound Way”. This requirement would avoid the risks of heavy traffic past the primary school. The proposal would represent an improvement in comparison to the extant residential planning permission under which the traffic from 475 houses would travel on Central Park Drive past the school.

Issue	The site should contribute to mitigation at Gibbet Hill junction
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The need for an upgrade to the A426/A5 Gibbet Hill roundabout is identified in the Strategic Transport Assessment which states at para 6.17 “Given the strategic nature of the A426/A5 Gibbet Hill roundabout, and the existing congestion issues at this location, it is not suggested that contributions from the Local Plan sites would necessarily be required to aid delivery. The analysis indicates that it is primarily an existing issue which will worsen over time to such an extent that a scheme will be triggered in any event. The relatively small increases in traffic flows arising from the local plan sites would be unlikely to trigger a step change in the conditions and/or justify individual mitigations. On the basis that a scheme here is likely to be triggered before the point at which the developments within the Plan start to come forward at a significant level.”

Issue	Potential for increased flood risk nearby because of the development of the site
Who raised the issue	Timms, Livia; Varma, Chaitanya; Coton Park residents group; Dixon, Chris; Awotunde, Oladapo
No. raising the issue	555
Council response	It is a requirement of both national policy and proposed Policy EN7 that development will (amongst other things) need to not increase flood risk elsewhere and, where possible, reduce flood risk overall. This would be assessed in detail at planning application stage

	through a site-specific flood risk assessment and drainage strategy. These would be reviewed and would need to be agreed by Warwickshire County Council as lead local flood authority.

Issue	Unclear whether land for playing fields will be genuinely gifted to Rugby Free Primary School or would be required to be purchased from the landowner by the school for a price of £3 million.
Who raised the issue	Rugby Free Primary school; Smith, Mike; Rewhorn, Vicki; Naish, Murray; Sandra, Sandra; Hinchliffe, Nick; Timms, Livia; Stuart, Laura; Davis, Ian; O'Connell, Mark
No. raising the issue	10
Council response	The requirement would be for the transfer of the playing fields for a consideration of £1. The landowner is aware of this and has confirmed that it is willing to proceed on that basis.

Issue	The site is physically and operationally constrained. It cannot flexibly accommodate B2/B8 units and its employment capacity is overstated
Who raised the issue	BARJANE; Stoford Properties Ltd
No. raising the issue	2
Council response	The masterplanning of the site to date has been undertaken by developer Panattoni. A pre-application process is underway. The capacity figures are based on a credible analysis of constraints and developable areas and are not overstated.

Issue	The site will not be viable for delivery of small employment sites based on a recent marketing assessment
Who raised the issue	Richborough Commercial (M45 J1)
No. raising the issue	1
Council response	The site is promoted by a very large employment developer, Panattoni. The site requirements include provision of smaller employment units. As part of a wider mix of unit sizes on the site, there is no reason to consider that these units cannot be delivered in the plan period.

Issue	A design code is required to demonstrate development could be appropriate
Who raised	Dixon, Chris; Davis, Ian

the issue	
No. raising the issue	2
Council response	The development requirements require compliance with a design code which will be prepared.

Issue	A footpath network through the site should be proposed beyond the formal PROWs
Who raised the issue	Dixon, Chris
No. raising the issue	1
Council response	This is a detailed design matter that can be considered through the preparation of a design code for the site.

Issue	River Avon designated Local Wildlife Site runs through this allocation; this is an important wider blue corridor and habitat for important protected species.
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	This is correct. The watercourse that runs through the site is a tributary of the Avon. It will be important that the design of the development protects the LWS and guidance on this will be developed through the design code that is to be prepared.

Issue	Inclusion of this site for employment unsound as it undermines the plan led system (as it has previously been allocated for housing)
Who raised the issue	Mitchell, Stuart
No. raising the issue	1
Council response	It is correct that the site was allocated for housing development in the Local Plan 2011-2031. In April 2023 the site secured outline planning permission for residential development of up to 475 homes but the site has not come forward. The site is now controlled by an employment developer (Panattoni) and has been promoted through the local plan process for employment use. National Policy in para 127(a) states that where the local planning authority considers that there is no reasonable prospect of a site coming forward for the use allocated in a

	plan “it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped)”. There is no conflict with the plan-led system as the proposed change is being made through a local plan.

Issue	Designation as employment land loses opportunity to create a school or community facility in the future - area is lacking in services for scale of housing
Who raised the issue	Awotunde, Oladapo
No. raising the issue	1
Council response	Under Local Plan 2011-2031 Policy DS7 as part of the (then) residential allocation at Coton Park East an 8.5ha parcel of land was reserved for a period of 12-24 months from the date of Local Plan adoption to safeguard against the potential need for a secondary school. However, Policy DS7 states that “Secondary school provision for Coton Park East is to be provided off-site through the expansion of existing secondary schools in Rugby to which a financial contribution will be required to provide for the school places generated by the development and pupil transportation.”. The safeguarding of land for a school lapsed in June 2021 and the County Council did not seek to acquire the land. The evidence for the new local plan, see the Education Topic Paper (document I11), does not support the need for a new secondary school. Therefore, no currently live opportunity is lost.

Issue	Includes potential Local Wildlife Site designations within the allocated site 'Gravel Works Pond and Marsh'
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	The potential local wildlife site is not shown on the latest local wildlife site mapping on Warwickshire County Council's website. In any event a potential local wildlife site is a site that has not yet been surveyed. The site has been allocated for development since 2019.

4.73. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)

No access to the site from Central Park Drive - access limited to Castle Mound Way only (one suggestion of access from A5, 2 suggestions of access from M6)	Rugby Free Primary school; Naish, Murray; Twynholm, Gary; Stuart, Laura; Sharma, Nishtha; Devendar, Abhishekh
Any new bus route should not pass Rugby Free Primary School due to congestion blocking through access as some times of the day	Rugby Free Primary school
Review/revise back to a mixed use/residential allocation	Mehta, Lynne; Mehta, Kamalgupt; Cooper, Clive; English, David; Hinchliffe, Nick; Rusgrove, Amanda; Hassell, Eve; RBC Conservative Group; Jenkins, Ellen; Devendar, Abhishekh; Awotunde, Oladapo
Extending Central Park Drive to connect to the residential estate from the other side of the school would improve access and egress	Pritchard, Ryan
Safeguard the site for future secondary school use due to current lack of one in North Rugby	Timms, Livia; Awotunde, Oladapo; Page, Thomas
Buffer to be extended - suggestions of 100-150m and least 500m from residential homes rather than the 50m proposed. Buildings should be masked from view in all seasons by a natural buffer.	Timms, Livia; Sharma, Nishtha; O'Connell, Mark
Requirement to facilitate network of trails around the perimeter and green areas in the site and make them accessible. Great Central Walk should remain a rural walk.	Coton Park East Committee; O'Connell, Mark
Amendments to development requirements: -amend first requirement to allow for more flexible use of the school expansion land -amend second requirement to read "provision of at least 4000m2 of space" to increase flexibility -amend fifth requirement to clarify access arrangements and require access point(s) to be formed in a manner which acceptably limits any conflict between commercial traffic and school traffic but that two access points is not essential -Amend sixth requirement to support pedestrian and cycle link to the south but remove reference to bus link provision -Remove seventh requirement for a design code	Panattoni and AC Lloyd
Further investigations and mitigations for air quality impacts	Sharma, Nishtha
Removal of overnight lorry parking facility	Sharma, Nishtha
A full assessment of the wider road network should be undertaken to assess whether there is sufficient capacity to accommodate increased commercial traffic and the development should be subject to a Transport Plan. Flood Risk Assessment should be undertaken.	O'Connell, Mark
If not deleted, require structural landscaping and a buffer on the eastern margin of the site to protect the Great Central Railway LNS and prevent coalescence with Newton.	Allanach, Richard

Council response to modification proposals: This site is not demonstrably available for residential development and is now being promoted and allocated for employment uses instead, which is supported by NPPF 127(a). It is therefore not appropriate to remove the overnight lorry parking facility.

This is not justification for safeguarding land for a secondary school – the Education Topic Paper (I11) notes that a secondary school in the north of Rugby is not currently required and demand can be accommodated through expansion of The Avon Valley School and other schools.

The access arrangements now require larger units, located furthest away from residential areas, to be accessed from Castle Mound Way which will minimise heavy goods traffic past the school. Access from the A5 would cross significant areas of third party land and access directly from the M6 would not be realistic.

The development requirements are designed to ensure a high-quality and sustainable outcome at this site which is sensitive to surrounding uses. Introducing further flexibility to the requirements risks a poorer outcome, particularly in regard to access routes. A design code is being prepared for the site which will set out more detailed requirements for access, buffers and landscaping.

SITE 17 SOUTH WEST RUGBY EMPLOYMENT PHASE 2

4.74. Five representations on behalf of 889 people or organisations argued that the allocation of site 17 is unsound. The following main issues were raised with this site allocation:

Issue	Welcome the reduction of scale of development proposed on this site, but still have concerns about the impacts of warehouses which should be discussed through the examination.
Who raised the issue	Action for Dunchurch; Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
No. raising the issue	886
Council response	The scale of developable area and floorspace allocated has been significantly reduced in comparison to the preferred options consultation from 130,000sqm to 60,000sqm to reduce impacts on Cawston Spinney and acknowledge elevated landscape sensitivity in the northeastern area of the site. The development requirements include tree lining to the west and south along the Potsford Dam Link Road and a 23ha country park as a buffer with the spinney. The proposal will also need to accord with the South West Rugby Design Code SPD.

Issue	Designation of a larger area for a country park rather than being safeguarded limits the potential for future development of the area not allocated for employment. Residential/mixed use development in the north close to the Spinney is more compatible in terms of landscape impact than employment development
Who raised the issue	Homes England; Taylor Wimpey Strategic Land

No. raising the issue	2
Council response	Developing the area currently designated for country park for residential does not represent a sustainable pattern of development. The housing would be sandwiched between an employment development and the Cawston Spinney ancient woodland with limited options for active travel or integration within the wider South West Rugby SUE. The creation of a country park will reduce landscape harms and ecological harms of the employment proposal and provide public benefit.

Issue	Transport impacts have not been sufficiently evidenced or mitigated
Who raised the issue	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch; Allanach, Richard
No. raising the issue	3
Council response	The Strategic Transport Assessment (I5) modelled the impacts of this proposal on the strategic road network and identified a need for improvement schemes at A4071/B4112 Newbold Road roundabout and the A4071 Potsford Dam Roundabout. A sensitivity test (document I6) confirmed the continuing need for this mitigation with the reduced floorspace at South West Rugby in comparison with the preferred options consultation document. Overall, the transport modelling of the site is considered to be adequate to provide a proportionate evidence base.

Issue	The Strategic Transport Assessment (STA) underestimates the congestion this allocation will cause and overestimates the modal shift which could be achieved in mitigation.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The respondent argues that the STA overestimates the modal shift to bus travel (from 9% to 14%) and the modal shift to walking and cycling (from 10% and 16% respectively to 13.5% and 21.5% respectively). Respondent argues that the existing modal share figures are based on a small sample survey and are higher than census 2021 travel to work data would suggest. The STA modal shift assumption borough-wide equates to a reduction of 1000 out of 47,000 vehicle + trips in an hour. This is reasonable when considering the level of intervention proposed by enabling Bus Service Improvement Plan (BSIP) and Local Cycling and Walking Infrastructure Plan (LCWIP) to come forward. This modal shift assumption also omits the potential benefits of localised interventions which will also accompany the developments as they progress through planning.

The STA only proposes an increase in walking and cycling trips of 4% for journeys under 5km. For buses an increase of 5% against today's figures is targeted, again this is limited to journeys under 10km.

In both instances, the effect only occurs if the trips can reasonably be intercepted (i.e. they are within 400m of proposed enhancements and/or can tie into those proposed enhancements). These aren't sweeping reductions, they are targeted based on the fact feasible measures exist that could come forward based on Warwickshire County Council's ambitions to improve the walking, cycling and bus networks.

The biggest adjustment in a single hour is approx. -2.29% vehicle when all measures are included (the lowest is 1.42%). There are not very significant in the context of total traffic demand within the model. The model sees predicted increases in traffic levels of over 2% per annum (22% to 24% in total).

The evidence allows for the measures identified within the BSIP and the LCWIP to achieve the policy targets based on the assumption that the origin and destination are within the respective distances and there is a means of travelling a different way which can be delivered in a particular area. If these solutions do not exist, no shift is achieved. This is why the STA goes into detail to identify what measures each development would depend upon to enable the shift to happen. It is about future infrastructure being provided to enable real choice in travel to be available to all users of the transport network. The measures and the shift are intrinsic, if we were unable to secure contributions towards (and delivery of) the proposed schemes then the shift would not occur, that is the crux of the council's case.

Of course, could still be argued that a reduction of less than 2% in driver trips across the network it is too ambitious, that the council should assess what happens if the shift is not delivered. But this is contrary to NPPF as it does not present a vision led scenario, it would be very much predict and provide. Furthermore, if we were to assess the effects on the network of congestion without mode shift, we would then be dependent entirely on a highway capacity infrastructure strategy.

Furthermore, significant highway schemes are still required even after mode shift has been accounted for, so it doesn't really stand that the STA has suppressed congestion given a significant need for strategic highway schemes is still identified

Without a local plan the council would not have the evidence to demonstrate how the contributions to schemes beyond highway capacity are needed and can be secured against the developments. Development would still in such circumstances occur but without a means to deliver a comprehensive strategy to manage the traffic growth so the outcome would be much worse.

Finally on this issue, site 17 is particularly well placed to deliver modal shift given its location within the South West Rugby development and therefore its ability to benefit from the package of sustainable transport measures required as part of that urban extension.

Issue	The WMSESS places the A45/M45/B4429 junction in the bottom half of all strategic road junctions surveyed, showing that this is a poor location for warehousing.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	All but one junction in opportunity area 7 (M6/A45/A46 M45 Coventry & Rugby) was identified in the WMSESS (SD4) as in the bottom 50% scoring junctions within the West Midlands. Junction scores are in table 11.3 on pages 164-168 of the WMSESS. The A45/M45/B4429 junction isn't scored in that table, and the reason is provided in Table 11.1 on page 155 (see also Appendix A9 of the study) as "no land parcel" i.e. a land parcel of over 25ha hadn't been identified. This is probably the case because the safeguarded land is within the South West Rugby allocation. Therefore, nothing can be inferred about the suitability of the junction from the WMSESS because it wasn't scored. The next closest junction, M45/B4429/Daventry Road was scored in table 11.3. This shows that junction as actually scoring higher than other junctions close to the town of Rugby, but less well than junctions on the edge of Coventry. Although relevant, the WMSESS never intended to provide a comprehensive assessment of the suitability for development of specific sites or locations. This was always made clear in the study to be the job of local plans. The respondent argues the location of the site is poor because northbound routing of commercial vehicles would go through Rugby. It is correct that northbound traffic would route on the A4071. However, this would equally be true for residential traffic from the site were it developed for housing. The site was safeguarded in the 2011-2031 for future development and lies within the South West Rugby strategic urban extension and so there isn't a realistic scenario in which it is not developed at all.

Issue	There are issues with three critical junctions that traffic from the site would use, yet none of them have improvement works scheduled with any certainty.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The junctions are A426/A4071 Avon Mill, A426/Boughton Road Roundabout and A426/A5 Gibbet Hill. Traffic heading north or east would need to pass through or be affected by congestion from these roundabouts. The response notes that the STA report identifies that funding for the Avon Mill and

	Boughton Road Roundabout schemes is uncertain while this is equally the case for Gibbet Hill. The STA shows these schemes as being needed before the local plan allocations are developed. The respondent notes that an employment omission site north of Houlton was not advanced partly because of its reliance on/impact on the Gibbet Hill junction and argues the same should apply to South West Rugby. However, the additional volumes of traffic that would use the Gibbet Hill junction differs significantly between the North of Houlton scheme and South West Rugby. Figure 66 in the original Strategic Transport Assessment (document I3) shows for North of Houlton an AM development flow of 300-400 vehicles southbound from Gibbet Hill and 200-300 vehicles northbound to it from each of the A5 and A426 approaches. By contrast the equivalent trip distribution diagram for the South West Rugby scheme (Figure 2 of document I6) shows 0-50 vehicles routing each way through Gibbet Hill, this remains the case even if a higher quantum of floorspace is delivered (trip assignment diagram on page 85 of document I5). Therefore, the magnitude of impact at Gibbet Hill is very different. Overall, the view taken by the Council is that the absence of certainty over delivery of the three mitigation schemes to address existing impacts doesn't create a defensible basis for a moratorium on the allocation of further development land at Rugby. It would be particularly unlikely to justify the non-allocation of South West Rugby given that it was previously identified as suitable for future development and safeguarded for that purpose in the Local Plan 2011-2031. However, the existing traffic issues, particularly at Gibbet Hill, have influenced decisions about the scale and location of growth at Rugby. In that context, South West Rugby is one of the better locations for new development at the town.

Issue	Plan can meet its assessed need without allocating safeguarded land
Who raised the issue	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch; Allanach, Richard
No. raising the issue	3
Council response	This is not correct. The level of land proposed to be allocated in the plan is needed to meet assessed development needs and make a contribution to meeting the unmet local need of Coventry.

Issue	The site has not been evaluated for potential housing, despite this step being promised during the 2018 plan examination.
Who raised the issue	Allanach, Richard

No. raising the issue	1
Council response	It is true the site was safeguarded for employment or residential development. The respondent notes that the landowner has pursued applications for housing elsewhere on the site with the intention of disposing of the land to housebuilders. The land is owned and promoted by Tritax Big Box Developments Ltd who submitted it for employment development in the Call for Sites and have submitted a planning application for employment use. The council considers that in these circumstances its ability to demonstrate that the land is available for residential development and achievable as a residential site is highly questionable.

Issue	Reduction of the floorspace allocated is unjustified by evidence and is inconsistent with national policies on making effective use of land and prioritising non-Green Belt sites.
Who raised the issue	Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	1
Council response	This was also raised as an objection to Policy S7. The reduction in floor space has been informed by up to date landscape evidence, namely the Area of South West Rugby Landscape Sensitivity Assessment January 2026 (SS24) which identified the northern areas of the site closer to Cawston Spinney as having high sensitivity to commercial development with medium and low sensitivity towards the southern half of the site. The report notes the role of this land in protecting the ecological and landscape integrity of the spinney. Given the reason for the reduction in floorspace, this remains consistent with the national policies cited.

Issue	Reducing the developable area of the safeguarded land has direct implications for the funding and delivery of associated strategic infrastructure including S9 Potsford Dam Link Road
Who raised the issue	Homes England; Taylor Wimpey Strategic Land; Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	3
Council response	This refers to the reduction of floorspace proposed on site 17 between the preferred options and proposed submission versions of the emerging local plan. The delivery of the spine road network was planned to take place without any

	development of the safeguarded land (site 17). The South West Rugby Masterplan SPD and its strategic infrastructure schedule (Appendix K) make no assumption of contributions from the safeguarded land. Therefore, delivery of the spine road network is not contingent upon achieving a target level of floorspace on site 17.

Issue	Concern regarding the site directly adjoining Cawston Spinney Local Wildlife Site and ancient woodland, potential harm to wildlife and landscape.
Who raised the issue	Warwickshire Wildlife Trust; Allanach, Richard
No. raising the issue	2
Council response	In relation to landscape impact, the respondent notes the comments on the sensitivity of the site in 2017 Warwickshire County Council landscape study which said the site was inappropriate for commercial development. The respondent also notes the more recent landscape study (document SS24) and argues the proposed allocation conflicts with it because the proposed development area cuts across field boundaries. The revised proposal and reduced floorspace proposed (in compared to the preferred options) directly respond to the landscape evidence by pulling development back from the Spinney to deliver a more significant public open space buffer. The respondents note the proximity of the site to the ancient woodland and its vulnerability to changes in air quality, surface water quality and hydrological regime. Together with the potential for recreational impacts and lighting and noise from employment land effecting birds. The site was subject to an Ecological Constraints Assessment (SS25) which concluded that there were medium constraints at the site but that it had potential to be taken forward for development subject to appropriate mitigation measures and sensitive site design. As noted above, the developable area has been significantly reduced from 130,000sqm to 60,000sqm at Regulation 19 which will allow for a significant buffer between the built area and the Cawston Spinney. There will be further ecological assessment at application stage and the site design will need to ensure no adverse effects on the spinney (or Draycote Meadows SSSI)

4.75. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
23ha of public open space should be reduced in line with the Preferred Options allocation and the non-developed land	Homes England; Taylor Wimpey Strategic Land

safeguarded for housing or other compatible uses	
Add development requirement for lighting strategy with input from ecologist to minimise harm to wildlife	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Amend development requirement on public rights of way to replace 'are pleasant to use' with 'retain the character of the surrounding area'	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Change 'may' to 'shall' in final two development requirements seeking contributions to two road schemes	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Add a requirement for the development to have the same traffic management scheme which prevents HGVs from Symmetry Park moving through Dunchurch crossroad.	Allanach, Richard
Council response to modification proposals: The developable area has been reduced in line with the latest landscape evidence (Area of South West Rugby Landscape Sensitivity Assessment January 2026 – SS24) – public open space is felt to be the most appropriate use for this land in terms of landscape impact and ensuring sustainable patterns of development. The development requirements are designed to ensure a high-quality and sustainable outcome at this site with regard to the surrounding area, while also allowing for details to confirmed at a later stage in the process. The specific contributions and mitigation measures required by the site will be determined at application stage. The council does not therefore consider that the modifications are required to address issues of soundness.	

SITE 14 NORTH OF ANSTY PARK

4.76. Six representations on behalf of six people or organisations argued that the allocation of site 14 is unsound. The following main issues were raised with this site allocation:

Issue	Site has poor access by sustainable transport modes and therefore doesn't represent a sustainable pattern of development contrary to NPPF para 148
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The development requirements ensure the site will have pedestrian links to the Central Boulevard of Ansty Park which is served by bus routes to both Coventry and Rugby. The site is likely to benefit from the future Very Light Rail service from Coventry which is intended to terminate in this area. Overall, the site is proximate to its workforce and benefits from good sustainable transport links with potential for transformative improvement.

Issue	Gradual encroachment of Ansty Park onto rural land, harming landscape and rural setting

	for nearby residents on Nettle Hill
Who raised the issue	Combe Fields Parish Council
No. raising the issue	1
Council response	There is a requirement for the council to identify further employment sites and supporting the development of a cluster at the existing Ansty Park will enable pooling of facilities, more efficient use of land and help diversify the Borough's economy. The Landscape Sensitivity Assessment for larger sites (SS20) found the site had low sensitivity.

Issue	Instant mature tree screening needed along Combe Fields Road and the B4029 to mitigate impacts
Who raised the issue	Combe Fields Parish Council
No. raising the issue	1
Council response	The development requirements include a managed, high-quality landscaped environment. This will include screening although the exact details would be determined at application stage.

Issue	Release of Green Belt land will have an urbanising effect and contribute to urban sprawl
Who raised the issue	Parsons, Chris
No. raising the issue	1
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the reasoning for allocating sites within the Green Belt. It states that allocating employment land on the edge of Coventry and specifically at Ansty Park will help to diversify employment opportunities in the Borough, support agglomeration and clustering at existing hubs and reduce commuting times from Coventry. The Green Belt Contribution Study (GBD1) provisionally identified this site as grey belt.

Issue	Site should have been assessed in stage 2 Green Belt study
Who raised the issue	Stoford Properties Ltd
No. raising	1

the issue	
Council response	The Stage 2 Green Belt Contribution Study (GBD2) looked at sites which had not been provisionally identified as grey belt. This site was identified as grey belt in the Green Belt Contribution Study (GBD1). This is a proportionate approach. It was considered unlikely that this site would, based on a site-specific stage 2 study, be reclassified as non-grey belt Green Belt.

Issue	Site would be difficult to deliver and fund if restricted to E(g)(ii)/E(g)(iii)/B2 uses, because regional occupier demand is dominated by B8 logistics uses.
Who raised the issue	Manse Opus and Sir Thomas Whire's Charity; BARJANE
No. raising the issue	2
Council response	Manse Opus have succeeded on delivering the adjoining Ansty Park which was subject to a similar restriction. There is no clear evidence that manufacturing, research and development and light industrial uses are undeliverable in this location. The site was promoted for B2, light industrial and R&D uses prior to the Reg 19 consultation. The site responds to the advice in the West Midlands Strategic Employment Sites Study (document SD4) on the need to allocate sites of circa 25ha specifically for industrial and R&D uses rather than warehousing. This is also needed to accord with the plan's objectives and those of the council's Economic Strategy (document SD17). An extension to Ansty Park is the best location in the borough for delivering these uses because it allows for the further growth of an existing cluster of advanced manufacturing and R&D facilities in this location.

4.77. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Add in flexibility to use class requirements for the site, allowing up to 50% of the floorspace to be used for class B8	Manse Opus and Sir Thomas White's Charity
Amend policy to require tree screening/landscape buffer along Combe Fields Road	Combe Fields Parish Council; Manse Opus and Sir Thomas White's Charity
Make clear that access is not via Combe Fields Road	Warwickshire County Council
Requirement for contributions to public transport	Warwickshire County Council
Council response to modification proposals: The council does not support a modification to allow 50% B8 use for the reasons explained above. The development requirements state that vehicular access is to be through Ansty Park. Specific contributions required, as well as highways and landscaping considerations will be addressed in more detail at application stage.	

No modifications are needed to address issues of soundness.

SITE 95 CROWNER FIELDS FARM AND HOME FARM, ANSTY

4.78. Six representations on behalf of six people or organisations argued that the allocation of site 95 is unsound. The following main issues were raised with this site allocation:

Issue	Development requirements do not account for the overhead power line and two pylons that are present
Who raised the issue	National Grid Electricity Distribution
No. raising the issue	1
Council response	This site now has planning permission R23/1027 which includes diversion of the existing overhead powerlines which cross the site.

Issue	Loss of Green Belt land unacceptable - Release of this land will have an urbanising effect and contribute to urban sprawl
Who raised the issue	Parsons, Chris; Foss, Jeremy
No. raising the issue	2
Council response	The Green Belt Exceptional Circumstances Topic Paper (GBD4) sets out the justification for releasing employment sites from the Green Belt. It states that allocating employment land on the edge of Coventry and specifically in proximity to Ansty Park will help to diversify employment opportunities in the Borough, support agglomeration and clustering at existing hubs and reduce commuting times from Coventry. This site now has planning permission R23/1027 and will be released from the Green Belt to ensure it is able to come forward in line with other allocation sites and existing industrial areas.

Issue	Site has poor access by sustainable transport modes and therefore doesn't represent sustainable pattern of development contrary to NPPF para 148
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council	We disagree. The site is close to Coventry and access by bicycle can be created in line

response	with the development requirements. The site has planning permission and this includes a sustainable transport package including bus service improvements.

Issue	Development requirements are overly prescriptive regarding delivery of specific quantum of open space corridors
Who raised the issue	Frasers Group
No. raising the issue	1
Council response	The development requirements reflect the provisions of the extant planning permission for the site which was granted based on a very special circumstances case. There is a need for prescriptive requirements to avoid diminution of open space provision in comparison to that permission.

Issue	Traffic modelling is too focused on junctions and strategic roads without considering real-world use of cut-through routes through rural villages.
Who raised the issue	Connell, Mike; Foss, Jeremy
No. raising the issue	2
Council response	The Strategic Transport Assessment models likely trip generation and distribution. This assesses impact on the network and identifies where issues would arise. In relation to the issue of inappropriate routing of commercial vehicles on rural roads, the planning permission includes a condition in relation to freight management to ensure HGV's are not using the secondary access and routing through villages.

Issue	Proposal will have significant adverse impacts on air quality in the surrounding area including Shilton with no sufficient mitigations in place to prevent HGV traffic flows through villages
Who raised the issue	Connell, Mike; Foss, Jeremy
No. raising the issue	2
Council response	The site has a detailed planning permission and this was supported by an environmental impact assessment. The environmental statement included air quality chapters which considered the air quality effects of the development both during construction and post-occupation. The summary of the post-occupation assessment in the officer's report to committee states as follows:

	“The AQCs [Air Quality Chapters] consider the potential effects of the completed development. They conclude that air quality conditions for future users of the development would be acceptable. Concentrations would be well below air quality objectives throughout the site. Furthermore, they demonstrate that pollutant concentrations would be well below objectives at all existing receptors in 2030 with or without the development. Emissions from the additional traffic generated by the development would have a negligible (not significant) impact on air quality conditions at all existing receptors along the local road network. This relies on mitigation such as active and sustainable transport options being provided and utilised to achieve a modal shift.”. Overall it is concluded that the proposed development would not have a significant impact on air quality.

Issue	Loss of arable land should not be permitted due to the need for food security in current global political situation
Who raised the issue	Foss, Jeremy
No. raising the issue	1
Council response	This was an issue considered in determining the planning application for the site.

4.79. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Insert a requirement for the masterplanning of the development to account for the overhead power line, enabling it to remain in situ.	National Grid Electricity Distribution
Insert a requirement for mitigatory measures and traffic re-routing to minimise impacts on nearby villages such as Shilton	Connell, Mike
Further specific assessments of HGV and diversionary traffic impacts to surrounding villages such as Shilton	Connell, Mike
Requirement for open space corridors should not specify the hectarage, only that sufficient open space is needed	Frasers Group
Council response to modification proposals: For the reasons explained above, these modifications are not supported by the council.	

SITE 121 LAND AT WALSGRAVE HILL

4.80. 11 representations on behalf of 117 people or organisations argued that the allocation of site 121 is unsound. The following main issues were raised with this site allocation:

Issue	Combination of gypsy and traveller accommodation, recreational space, lorry park, industrial buildings and a blue light route is unsound as needs of these will be in constant conflict.
Who raised the issue	Combe Fields Parish Council
No. raising the issue	1
Council response	There is no conflict between the blue light route and industrial use of the wider site. Indeed, at Regulation 18 stage University Hospitals Coventry and Warwickshire NHS Trust responded in support of the allocation of the site based on its ability to deliver the blue light route. The site is 201.8ha in areas and would deliver 290,000sqm of floorspace at a plot ratio of 0.14 (i.e. only 14% of the site would be used for the footprint of industrial buildings). When site roads and car parking is factored in the proportion of the site built on would be higher, but nonetheless a large part of the site would be used for green space. This also creates an opportunity for the provision of Gypsy and Traveller pitches on a modest scale, as proposed. This would not conflict with the proposed employment use. The location is close to the edge of Coventry with new walking and cycling routes proposed and potential for very light rail. This would be a suitable location for new pitches.

Issue	Development of large B2 and B8 use buildings will harm the setting of Coombe Abbey RPG which is not sufficiently mitigated by the measures proposed in the development requirements.
Who raised the issue	Historic England; Ansty Parish Council; Prologis UK Limited; Mountpark Logistics EU Sarl; Stoford Properties Ltd; Allanach, Richard
No. raising the issue	6
Council response	The response to the Regulation 19 consultation from Historic England objected to the proposed allocation. Since the close of the consultation the site promoters have undertaken further work including zone of theoretical visibility mapping, production of verified views and creation of a landscape strategy (these are provided as documents WH1 and WH2). On the basis of this new material an updated heritage assessment has been prepared for the council by its consultant Node (document WH3). Meetings to consider this issue have been held with Historic England. A draft statement of common ground is submitted (document SOCG10) which sets out the council's position in relation to Historic England's objection to this site. Historic England have advised that they require more time to formulate their position in response to the new material and an updated SOCG including this will be submitted as soon as possible.

Issue	Sustainability Appraisal ranks site 121 lowest of the options for historic environment impact but gives greater commentary on the heritage impacts of Scenario 3 North of Houlton site. HE disagrees with its appraisal of the site as having 'good potential to avoid and mitigate impacts'
Who raised the issue	Historic England
No. raising the issue	1
Council response	The Sustainability Appraisal is necessarily based on the information available to the consultants at the time of writing. The council considers that there is mitigation potential and accordingly there was no error in the Sustainability Appraisal. The Council's updated position on the scope for mitigation is set out in document WH3.

Issue	The allocation of Site 121 is unsound because its development requirements do not include any locational requirements for the proposed G&T pitches. Also inclusion of G&T site not fully justified when there are no G&T allocations in similar sites close to Rugby town, which is the most sustainable location.
Who raised the issue	Manse Opus and Rolls Royce Plc; Timms, Heather
No. raising the issue	3
Council response	The exact location of pitches within the site will be determined at planning application stage. This is an acceptable approach in plan making. The new employment sites allocated at Rugby are at South West Rugby and Coton Park East. Both of these sites are significantly smaller than Walsgrave Hill. The latter is 201.8ha in area compared to 40.7ha at South West Rugby and 35.97ha at Coton park East. The larger site size presents an opportunity to include Gypsy and Traveller pitches without difficult relationships with neighbouring employment units. Overall, as set out in the Green Belt Exceptional Circumstances Topic Paper (GBD4), there were not opportunities to locate the pitches at Rugby instead.

Issue	Site is not in a sustainable location and therefore its allocation is contrary to national policy. In particular, site has poor access by sustainable transport modes and therefore doesn't represent sustainable pattern of development contrary to NPPF para 148.
Who raised the issue	Ansty Parish Council; Allanach, Richard; Stoford Properties Ltd
No. raising the issue	3

Council response	Mr Allanach argues that the proposal would be poorly aligned with the available road infrastructure citing predicted queue impacts at M6 J2 and Toll Bar End roundabout. He also argues that modal shift to public transport, walking and cycling is overestimated in the Strategic Transport Assessment. The council's response to the latter point is included in the issues raised for site 17 South West Rugby and is not repeated here. In relation to congestion at M6J2 and Toll Bar End, accommodating the necessary large level of employment land at any location on the strategic road network (SRN) in the borough is going to generate traffic movements and create impacts on the SRN. In this context, the scale of impacts created by this site is shown in the Strategic Transport Assessment to be less than many of the reasonable alternative sites. Overall, National Highways response confirms no significant concerns in relation to the impact. On the question of the wider sustainability of the site: (1) it is on the edge of Coventry the largest by far centre of population in the functional economic market area, likely reducing commute distances (2) circa 700 new homes are planned on the opposite site the A46 and the site would be linked to them by a new walking and cycling route.

Issue	Exceptional circumstances for the release of Green Belt have not been adequately demonstrated, and suitable non-Green Belt options have not been exhausted.
Who raised the issue	Ansty Parish Council; Parsons, Chris; Timms, Heather; Stoford Properties Ltd; Mitchell, Stuart; Allanach, Richard
No. raising the issue	6
Council response	This issue is raised in relation to Policy S7. The council's exceptional circumstances case is set out in the topic paper (document GBD4).

Issue	Development will cause unacceptable harm to biodiversity and/or landscape
Who raised the issue	Ansty Parish Council; Mountpark Logistics EU Sarl; Stoford Properties Ltd; Allanach, Richard
No. raising the issue	4
Council response	The council's evidence (documents SS25 and SS27) identifies that site has high ecological constraints owing principally to proximity to Coombe Pool SSSI. Mitigation proposals have been identified including a landscape buffer, retention of habitat features and significant new habitat creation as part of a high on-site BNG likely to be >50%. However, further technical studies are needed including a hydrological assessment, detailed air quality assessment, and noise, lighting and visual assessments. Such assessments will need to be prepared and to inform site design and the mitigation strategy at planning application stage. The landscape evidence prepared (documents SS20 and SS21) shows, factoring in mitigation proposed, the site to have medium/low landscape sensitivity. The post-

	mitigation assessment (SS21) concludes “Although the development has potential to alter views from sensitive receptors, the large-scale extension proposed for the country park is likely to offer high levels of mitigation, in the form of benefits for recreation and biodiversity.”. Overall, the site would not cause unacceptable biodiversity or landscape harm.

Issue	Site was not allocated in last local plan because of proximity to an SSSI & heritage assets, and lack of exceptional circumstances for Green Belt release
Who raised the issue	Timms, Heather; RBC Conservative Group; Allanach, Richard
No. raising the issue	18
Council response	The position on Green Belt exceptional circumstances can change over time, as it is dependent on the scale of need to be planned for and the alternative options available. Therefore, conclusions made about in exceptional circumstances in 2018 do not hold in 2026. Heritage and ecology are raised as separate issues above. The development proposed in 2018 and before was a residential development.

Issue	Delivers materially less floorspace than the strategic site it replaced which is not otherwise accounted for
Who raised the issue	BARJANE
No. raising the issue	1
Council response	This comment refers to a change made between the Regulation 18 preferred options stage, in which land west of Ryton on Dunsmore (Prologis Park West and Mountpark) was proposed as an allocation and the proposed submission plan in which this allocation was replaced with land at Walsgrave Hill. The supply position in the Regulation 18 consultation document is not directly comparable with the proposed submission plan as it was based on a different plan period (2024-2045 compared to 2025-2042). Additionally the monitoring position moved on by a year and the HEDNA-WMSESS Alignment Paper Addendum (SD6) was prepared with adjustments to need figures. The council considers that the proposed submission local plan puts forward sufficient supply to meet assessed needs.

Issue	Site added at reg 19 stage therefore requirement for public engagement not adequately

	met
Who raised the issue	Timms, Heather; Case, Paul
No. raising the issue	2
Council response	This comment is a reference to the site not being identified as a preferred option as part of the second Regulation 18 consultation. At that stage it was instead identified as a reasonable alternative. Holding a second regulation 18 consultation is effectively an optional step under The Town and Country Planning (Local Planning) (England) Regulations 2012. The plan has been prepared in accordance with the regulations and with the Statement of Community Involvement (document CD16). Adequate public engagement has been undertaken.

Issue	Very light rail isn't funded and so shouldn't be taken into account
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	It is correct that very light rail is not yet funded, and the route is not confirmed. However, it is an aspiration of Coventry City Council to create a route linking Ansty Park with the city centre and as set out in the statement of common ground with Coventry City Council (SOCG2) the city council support the safeguarding of such a route. Therefore, the council's position is that it is reasonable to take this opportunity into account in considering the site.

Issue	Site is in the middle of the green belt and, if built, will reduce the distance between Coventry and Rugby
Who raised the issue	RBC Conservative Group
No. raising the issue	16
Council response	The site is within the Green Belt and its contribution to Green Belt purposes is considered in the evidence base (documents GBD1-2). The council's exceptional circumstances case is set out in the topic paper (document GBD4). The level 2 Green Belt assessment (GBD2) identifies that the parcel lies in a robust gap of almost 10km between Rugby and Coventry and that the site forms a small part of the gap and that its development would have a minor impact on the visual separation between the towns. Overall, the site is identified as having a moderate contribution to the purpose of

	preventing neighbouring towns from merging.

Issue	Location on the edge of Coventry means that a proportion of the economic benefits would be drawn away from Rugby.
Who raised the issue	Mitchell, Stuart
No. raising the issue	1
Council response	This site is on the edge of Coventry. However, it lies within the same functional economic market area and housing market area as does Rugby and so some of the jobs created would benefit Rugby residents. The interconnectedness of the area also means that residents of the town of Rugby benefit from the economic growth in the borough. Given the need for employment land is part regionally/sub-regionally derived it would not be sustainable to seek to accommodate all this new employment land at Rugby.

Issue	Allocation of this site is not needed to meet employment land needs which have been overestimated by the Council.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	This comment relates principally to Policy S3 under which the council has responded to similar comments.

Issue	Allocation will not foster diversification of Rugby's economy.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The respondent argues that Rugby's economy is already over-weight in logistics citing page 17 of the 2022 HEDNA. He also argues that more big boxes will not diversity employment but further concentrate it into logistics. The council acknowledges the dominance of logistics in recent development at the town of Rugby, but notes at Ansty Park and Prologis Park Ryton development has been more mixed with B2 and research and development uses in addition to B8. The location of this site adjacent Ansty Park and the proposed mix of different unit sizes gives the potential to deliver a similar mix of uses.

4.81. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessarily comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Failing the removal of the site, recommended that two parcels of 'developable area' to the west of the RPG are removed to result in a smaller site to the north and a green buffer	Historic England
Further explanation of potential heritage impacts of the site required in the SA	Historic England
Site should be removed or at least substantially reduced	Mitchell, Stuart; Allanach, Richard
If the allocation is not deleted, then add a requirement for a buffer or at least 500m between new development and the Coombe Pool SSSI.	Allanach, Richard
Council response to modification proposals: The council's current position in relation to Historic England's comments is set out in the statement of common ground. Historic England's updated position is awaited and will be submitted as part of a signed statement of common ground. The council does not support the removal or reduction of the site nor the specification of the proposed buffer distance,	

POLICY S8 SOUTH WEST RUGBY

4.82. Five representations on behalf of five people or organisations argued that policy S8 is unsound. Four representations on behalf of four people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	The implications of reducing the developable area of the site 17 employment allocation on the funding and delivery strategy of policy S9 and appendix K of the South West Rugby masterplan should be considered.
Who raised the issue	Homes England
No. raising the issue	1
Council response	Appendix K of the South West Rugby Masterplan SPD was not predicated on any development of the safeguarded land as at that point it was not allocated for development. The development principles plan for the new site allocation under Policy S7 remove 90 houses from the areas proposed to be developed for residential in the South West Rugby Masterplan SPD as this area is now proposed to be part of the open space buffer to Cawston Spinney. The delivery of employment floorspace on the safeguarded land should offset this. This will need to be considered as part of the planning applications.
Issue	Proposals are not deliverable in the timescales suggested.

Who raised the issue	Pailton Parish Council
No. raising the issue	1
Council response	The trajectory for South West Rugby is realistic. First completions on the site are expected in 2026-27. This therefore implies a build rate of 219dpa across the site over the plan period. This is relatively high, compared to national averages, but is realistic in a borough with a strong track record of delivering large urban extensions including Houlton as detailed above. As detailed in the Development Needs Topic Paper, the absence of a master-developer at South West Rugby and greater fragmentation of land ownership is likely to give rise to more competition and more sales outlets on site, driving more rapid delivery.

Issue	The original aim was for warehousing in SW Rugby to deliver employment for 2,500 employees but figures don't support this.
Who raised the issue	Coleman, Brian
No. raising the issue	1
Council response	Policy DS8 of the adopted local plan allocated 35ha of employment land at the South West Rugby urban extension. The purpose of this was to meet the needs for employment land in Rugby Borough and the wider functional economic market area. Although estimates may be made regarding the number of employees that allocated developments may have once built out, this is not something that the planning system can regulate.

Issue	Since the build [of warehouses at South West Rugby] the area has suffered light pollution, impact on bird population & flooding in Thurlaston. No further warehousing should come forward in the area.
Who raised the issue	Coleman, Brian
No. raising the issue	1
Council response	The impact of the warehouses that have already been built out at South West Rugby was considered when the adopted plan was examined and the planning applications were decided. Although the development of the existing warehouses cannot be retrospectively amended via the new local plan, their presence has been accounted for when giving due consideration to the potential impacts of allocating site 17, which would effectively act as an extension to the existing employment site. These potential impacts have been assessed with reference to a range of technical evidence, such as an ecological constraints assessment (SS25), and would need to be considered again in greater detail at the application stage against the requirements of local and national policy, including policies that relate to flooding, the natural environment, and the amenity of neighbours.

Issue	Policy is unsound because of criterion E refers to the South West Rugby Design Code which is itself an unsound SPD.
Who raised the issue	Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	1
Council response	The South West Rugby Design Code was adopted by the Council on 9 July 2025. The Council have already addressed the consultee's points of opposition to the SPD, as detailed in the SPD's consultation statement, and do not deem it necessary to reproduce these here.

Issue	The plan states "Physical and visual separation from the Dunchurch settlement boundary shall be maintained by a significant green buffer to prevent coalescence." but it is clear from the "South West Rugby Masterplan Supplementary Planning Document" that there is no significant area of separation. It is also not clear what constitutes a green buffer.
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council response	An explanation of the buffer area between Rugby and Dunchurch is given on pages 22-29 of the South West Rugby Masterplan SPD and its extent is shown in the figures included in that document. The SPD specifies that the buffer will incorporate "a green infrastructure corridor from Cock Robin Wood to Cawston Spinney", and green infrastructure is defined in the glossary of the same document. The Council deems that the extent and characteristics of the buffer are made sufficiently clear by the SPD.

Issue	Requirements of adopted policy DS8 are weakened without justification. The requirements for the green infrastructure corridor to link to adjacent networks, for structural landscaping, and for SWR to develop a separate character and sense of community from both Rugby and Dunchurch should be reinstated.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The extent and characteristics of the green infrastructure corridor needed in South West Rugby, including the need for it to link with adjacent green infrastructure, has been set out in the South West Rugby Masterplan SPD, the requirements of which will continue to apply per S8.C.vii. Therefore, it is not deemed that specifying the need for the development to deliver a green and blue infrastructure corridor in a more concise manner in the new policy (i.e. not explicitly stating that there must be links to adjacent networks) will make a material difference in this regard. The same position is deemed to apply with

	regards to the separation of Rugby and Dunchurch; the policy retains the requirement for physical and visual separation, and a more detailed explanation of the landscaped buffer is provided for by the SPD. That proposed policy S8 refers to “landscaping” while adopted policy DS8 refers to “landscaping measures, including structural landscaping” this wording difference is not deemed to be of significance.

4.83. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Wording around off-road networks should be clear that equestrians cannot be designed out of off-road routes. Explicit reference to consideration for horse riding in active travel routes around Cock Robin Wood and Cawston Spinney, for example.	British Horse Society
Contributions may be sought towards delivery of highways and active travel mitigation schemes listed in Appendix K of the South West Rugby Masterplan SPD	Homes England; Taylor Wimpey Strategic Land
In para G insert the word “structural” before the word “landscaping”.	Allanach, Richard
Replace para F with “The physical and visual separation of Dunchurch and the town of Rugby shall be maintained by a significant green buffer to prevent coalescence”.	Allanach, Richard
Add the phrase “linking to adjacent networks and” after the word “corridor” in para C (v).	Allanach, Richard
Council response to modification proposals: The comment in relation to equestrians is a detailed design matter that can be picked up at planning application stage. The policy already requires at Cvii the delivery of the strategic infrastructure SPD. Further specific reference to the part of the SPD listing requirements i.e. Appendix K is not needed. The council’s response to the comments of Richard Allanach is set out above. Overall, no modifications are considered necessary.	

POLICY S9 SOUTH WEST RUGBY SPINE ROAD NETWORK

4.84. Two representations on behalf of two people or organisations argued that policy S9 is unsound. Four representations on behalf of four people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	S9 is unsound because the viability of the South West Rugby Spine Road Network is undermined by the reduction of the floorspace allocated at Site 17.
Who raised the issue	Tritax Big Box Developments Ltd (Site 17)

No. raising the issue	1
Council response	This refers to the reduction of floorspace proposed on site 17 between the preferred options and proposed submission versions of the emerging local plan. The delivery of the spine road network was planned to take place without any development of the safeguarded land (site 17), The South West Rugby Masterplan SPD and its strategic infrastructure schedule (Appendix K) make no assumption of contributions from the safeguarded land. Therefore, delivery of the spine road network is not contingent upon achieving a target level of floorspace on site 17.

Issue	The defining description in para 1.40 is unjustified because it does not reflect evidence in the South West Rugby SPD. The requirement for one bus gate is specified in the supporting text for S9, while another is unnecessarily buried in the SPD. This is inconsistent with national policy which requires plans to be clearly expressed so as to give certainty.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	Paragraph 1.40 is supporting text/reasoned justification. It is not intended to be a comprehensive statement of the design detail, which is provided in the Masterplan SPD and Design Code SPD

4.85. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Development requirements set out in the Site Allocations annex should be updated for sites 62, 332, 353, 283, 350, 351, 354, 355, 279, 153, 294, 356, 357, 352, and 349 to include "Contributions may be sought towards delivery of highways and active travel mitigation schemes listed in Appendix K of the South West Rugby Masterplan SPD"	Taylor Wimpey Strategic Land
Insert "(with a bus gate)" after "Cawston Lane" in the third bullet point of para 1.40.	Allanach, Richard
Council response to modification proposals: A clear evidential justification does not exist for the site reference numbers listed by Taylor Wimpey which comprise all allocations in Rugby, many small and distant from the site, to contribute towards the South West Rugby mitigation package. The council's response to Mr Allanach is set out above.	

POLICY CL1 NET ZERO BUILDINGS

- 4.86. 101 representations on behalf of 110 people or organisations argued that policy CL1 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound. The following issues were raised in respect of policy CL1.
- 4.87. A significant proportion of the responses arguing the policy is unsound on the basis that it should address the locations of development and development should not occur in locations not deemed sustainable. This is not listed as a main issue below, because it is outside of the scope and purpose of the policy. The location of development in relation to transport is addressed in Policy I1 (transport).

Issue	Proposed net-zero buildings policy addresses only new buildings in operation but not the carbon cost of development or embodied carbon.
Who raised the issue	Yates, Alan; Frasers Group
No. raising the issue	2
Council response	The above statement is true. We recognise the importance of embodied carbon, whereby the construction materials and methods contribute to the building's overall carbon footprint. We will encourage consideration of these matters, but have chosen to focus policy at this time on buildings achieving operational net zero.

Issue	Development should not be required to deliver above national standards/government targets and should align with future building standard.
Who raised the issue	Inside Land Group; Barberry Ansty Limited; Tritax Park Rugby West Limited; Churchill Living & McCarthy Stone; Places for People; Catesby Estates (Site 136); Rosconn Group; Midlands Land Portfolio; Mackenzie Miller Homes; Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	10
Council response	The Net Zero Evidence report (CL1) sets out the case for a policy which would exceed current national standards and also the Future Homes Standard. These standards would not deliver net zero in operation.

Issue	Policy could raise viability issues/deter investment in borough/reduce affordable housing delivery.
Who raised the issue	Barberry Ansty Limited; Vistry Group; West Midlands Housing Association Planning Consortium; Catesby Estates (Site 136); Mackenzie Miller Homes; Tritax Park Rugby West Limited
No. raising the issue	6
Council	Amendments were made to policy CL1 following the Regulation 18 (Preferred Option)

response	consultation to minimise cost uplifts associated with achieving the policy objectives. This was based on the evidence set out in the Net Zero Evidence Base report (document reference CL1). The amended cost assumptions were subsequently included in the Viability Report (document reference I1) for the Submission Plan. We think this strikes the right balance between achieving net zero in operation and maintaining development viability.

Issue	Policy requirements for on-site electricity generation equal to demand and definitions of reasonably practicable maximums for on-site generation are overly onerous and unreasonable.
Who raised the issue	Frasers Group; Vistry Group
No. raising the issue	2
Council response	On-site renewable energy generation is a key component of achieving net zero operational carbon and is widely considered feasible in new developments, as set out in the evidence base report (CL1). Paragraph A.iv provides flexibility where on-site generation is not technically feasible, ensuring the policy remains practical and deliverable.

Issue	Policy should be consistent with revised climate policies in the draft NPPF (Dec 2025).
Who raised the issue	Richborough (Long Lawford)
No. raising the issue	1
Council response	The draft NPPF (December 2025) holds no weight at the time of writing. The national consultation on the proposed changes has closed and the outcome is awaited. We will monitor this matter when the new NPPF is published.

Issue	Fossil fuel free requirement in ii prevents new developments from being connected to mains electricity given it uses fossil fuels.
Who raised the issue	Frasers Group; Vistry Group
No. raising the issue	2
Council response	Fossil fuel free means no fossil fuels are used in normal building operation, with energy demands met through electricity and/or renewables. These definitions are consistent with national best practice and standards, including the UK Net Zero Carbon Buildings Standard and precedent local plans. The objective of the policy and the policy requirement is to match energy demand with renewable energy generation. In such circumstances it would be fossil fuel free.

Issue	Net zero in operation not achievable for speculative logistics buildings as occupier not

	known.
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising the issue	4
Council response	The policy recognises that at the outline application stage, it may not be possible to fully define energy use patterns due to unknown end-user requirements. Applicants are expected to provide energy strategies that demonstrate how the building could achieve net zero operational carbon, using representative assumptions for likely building use. Detailed 'as-built' assessments will be required prior to occupation (paragraph 2.3.2), ensuring that buildings meet policy standards once the end-user is known.

Issue	For employment buildings with automated systems and vehicle charging + there are also significant constraints to grid capacity which severely limits the size of PV array. This means requirement for renewables is not achievable for logistics buildings
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising the issue	4
Council response	Part A(iv) of the policy sets out a flexible approach where it can be demonstrated that renewable energy generation cannot technically match demand (e.g. server farms or refrigerated requirements). Part A(iv) was amended in line with consultation feedback at Regulation 18 (Preferred Option) stage and subsequent specialist advice. It now states that in such circumstances renewable energy generation should instead be maximised as far as possible. As set out in the Net Zero Carbon evidence base report (document CL1), this is similar to the approach taken in adopted local plan policies within England. Vehicle charging does not fall within the definition of unregulated energy in policy CL1. The definition of unregulated energy within Policy CL1 relates to energy consumed by the building itself (e.g. lighting, plug loads, appliances). This ensures the target reflects the true operational performance of the building without penalising developments for providing EV charging.

Issue	There are a number of statements which are ambiguous and may allow loopholes to be exploited. An example being "if iii is not technically achievable for a particular building typology in its context, on-site renewable energy generation shall be fully maximized as practicable". Who will define what is practicable?
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council	Part A(iv) of the policy (quoted above) was amended to be more flexible following the

response	Regulation 18 (Preferred Option) consultation on the basis of feedback received and the subsequent advice of the appointed specialist consultant. It is considered that this flexibility is necessary, as some development typologies may not be capable of achieving the requirements. Where this is the case, the applicant would be required to provide evidence and maximise energy generation as set out in the policy. This would be assessed on a case-by-case basis at planning application stage.

Issue	Query evidence in the Local Plan Viability Study for assumptions made on the cost uplift of achieving net-zero carbon or Future Homes Standard.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	Emerging Policy CL1 requires that developments should be net zero carbon in operation. The Council has sought specialist advice on the specific policy requirements from Bioregional, as set out in the Net Zero Evidence Report (document CL1) , who have advised that the extraover cost for two scenarios equate to 3.2% and 4% of construction costs, both of which are tested in the Local Plan Viability Study (I1). Policy CL1 is more stringent than the Future Homes Standard so no additional allowances are required for FHS.

4.88. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Detailed revised policy wording proposed (see rep)	Inside Land Group; Frasers Group; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
Amendments to on-site renewables requirements and energy efficiency should be loosened to be more reasonable and practicable (see rep for proposed wording)	Frasers Group
Amend to reflect revised national standards in building regs	Places for People
Passivhaus standards should be mandatory for all new builds.	O'Connell, Mark
Open and unmeasurable statements which can be exploited must be reworded and clarified to remove all aspects of ambiguity	O'Connell, Mark
Council response to modification proposals: Proposed modifications for policy CL1 either seek to strengthen the requirements or conversely loosen the requirements and increase flexibility. The council believes the current approach, which has been informed by specialist consultants Bioregional and the Net Zero Evidence Report (document CL1), strikes the balance of ensuring the desired outcomes are realised without impacting the ability of development to come forward.	

POLICY CL2 RENEWABLE ENERGY AND LOW CARBON TECHNOLOGY

4.89. 93 representations on behalf of 453 people or organisations argued that policy CL2 is unsound. The main issues for this policy are listed below.

Issue	Land between Clifton and Houlton identified as suitable for wind turbine development would have significant impacts on residents and landscape on the northwestern edge of Houlton and in Clifton.
Who raised the issue	Fung, Tsz Hong; Hardy, Rebecca; Hardy, Joshua; Dance, Stephanie; Wong, Fennie; Polamarasetty, Ananth; Residents of the Redrow estate, Houlton; Kirkton, Daniel; Kuncova, Miroslava; Ashwood, Sally; Sahul Hameed, Jasima Farveen; Tse, Chi Ho; Wong, Sau Yee; Barber, Paul
No. raising the issue	73
Council response	Policy CL2.C specifies that wind turbine development will, <i>subject to compliance with other policies of this plan</i> [emphasis added], be permitted within the areas shown as suitable on the policies map. The explanatory text goes on to flag up EN2 (Landscape protection) and EN8 (Environmental protection and amenity) as policies of relevance. Therefore, the Council deem that the impacts of any renewable energy developments on residents and landscape would be duly considered at the planning application stage.

Issue	Potential wind turbines between Clifton and Houlton poses significant threat to local wildlife, in particular bird and bat populations. Proximity to Oxford Canal requires ecological assessment. Policy is in conflict with NPPF section 15 focusing on conserving and enhancing the natural environment.
Who raised the issue	Nicholson, Carmen; Mistry, Ketan; Residents of the Redrow estate, Houlton; Abdul Kapoor, Sahul Hameed; Ashwood, Sally; Sahul Hameed, Jasima Farveen; Barber, Paul
No. raising the issue	66
Council response	As per the response to the previous issue, policy CL2.C specifies that wind turbine development will, <i>subject to compliance with other policies of this plan</i> [emphasis added], be permitted within the areas shown as suitable on the policies map. Policy EN1 provides protection to biodiversity and geodiversity, and this policy would have to be complied with if a wind turbine development proposal is to be permitted in the areas identified as suitable under CL2. Therefore, the policy is not deemed to present a significant threat to wildlife in the manner posed, and for the same reason is not deemed to be inconsistent with NPPF chapter 15. It is not deemed appropriate to subject policy CL2 to an ecological assessment. Such an assessment may instead be appropriate at the planning application stage should it be necessary to demonstrate that a wind turbine proposal is compliant with national and local planning policy.

Issue	Plan does not specify numbers of turbines, separation distances from homes or siting criteria.
Who raised the issue	Hardy, Rebecca; Hardy, Joshua; Dance, Stephanie; Yip, Alice; Polamarasetty, Ananth; Vaghela, Hemma; O'Neill, Hannah
No. raising the issue	7
Council response	Policy CL2 identifies areas that are suitable for wind turbine development, it does not allocate land in the manner that policies S6 and S7 do for residential and employment land. As such, it would not be appropriate for the policy to specify the number of turbines that each area could have capacity for. As is explained in the Renewable Energy Potential Mapping Methodology (CL3), distance buffers have been applied in arriving at the areas of suitability, including a 400m noise buffer for buildings. Although the policy does not provide detailed siting criteria for wind turbines, any proposals would need to comply with other policies of the plan that provide various protections. The renewable and low carbon energy PPG provides further explanation of the planning considerations for wind turbines and it is not deemed necessary to duplicate these in Policy CL2.

Issue	Policy has not been sufficiently evidenced that the proposals will not harm the residential amenity of nearby properties, health of residents or the landscape and character of the area.
Who raised the issue	Hardy, Rebecca; Hardy, Joshua; Dance, Stephanie; Yip, Alice; Polamarasetty, Ananth; Residents of the Redrow estate, Houlton; Vaghela, Hemma; O'Neill, Hannah; Ashwood, Sally; Sahul Hameed, Jasima Farveen; Tse, Chi Ho; Wong, Sau Yee; Longworth, Tom
No. raising the issue	72
Council response	In determining the areas suitable for wind energy development, document CL3 explains that a distance buffer from residential properties was applied. Policy CL2.C specifies that wind turbine development will, <i>subject to compliance with other policies of this plan</i> [emphasis added], be permitted within the areas shown as suitable on the policies map. This means that should wind turbine proposals come forward, they will only be permitted if they comply with policies that specifically relate to the matters raised above, including EN8 (Environmental protection and amenity) and EN2 (Landscape protection). It is deemed that these other policies provide sufficient protection against harms when read in combination with policy CL2.

Issue	Renewable energy and low carbon energy development are inappropriate in the Green Belt - policy should specify that non-Green Belt proposals are preferred.
Who raised the issue	James , Charles; James, Catharine; Wolvey Parish Council; Pare, Jennifer; Pare, Matthew; Court, Gerry & Carol; Spencer, June; Griffin, Colin; Jones, David; Ling, Philip; Jones, Barbara; Mooney, Diane; Jackson, Geoff; Penman, Judith; Higginson, Helen; Crispin, Elizabeth; Crosby, Ralph; Crosby, Sheila; Armson, Jean; Armson, Roy; Kimberley, Peter; Kimberley, Diane; Barkhouse, Mary; Barkhouse, David; Chrimes, Jennifer; Wykes,

	Michael; Wykes, Janet; Fitzgerald, Elizabeth; Pitt, Michelle; Beasley, Kevin; Beasley, Olivia; Beasley, Elaine; Squire, Colin; Isaac, Susan; Leach, Wendy; Russell, Pauline; Bassett, Graham; White, Claire; White, Garrie; Chrimes, Brian; Whitehead, Susan; Whitehead, George; Ashmore, Ryan; Matts, Sandra; Matts, Charlie; Elliott, Nicola; Elliott, Paul; Mallabone, Paul; Mallabone, Joanne; Coope, Joanne; Lumsden, Jennifer; Dale, Diane; Nicholson, Katy; Leavis, Carlton; Nicholson, Jessica; Randle, Susan; Fisher, Phil; Nicholson, Connor; Randle, John; Nicholson, Ian; Leavis, Arabella; Kelly, Patrick and Linda; Sheffield, Kim; Sheffield, Andy; Downes, Steve and Allyson
No. raising the issue	69
Council response	National policy already defines what constitutes inappropriate development in the Green Belt, and paragraph 160 of the NPPF (2024) specifically addresses renewable energy projects stating “When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.” It is not deemed necessary to duplicate this in the local plan.

Issue	Potential wind turbine development between Clifton and Houlton fails to consider the significant substantial harm to the setting of heritage assets such as St Mary's Church (Grade II listed).
Who raised the issue	Polamarasetty, Ananth
No. raising the issue	1
Council response	St Mary’s Church is within the centre of Clifton upon Dunsmore and approximately 1.1km at its closest point to the area identified as suitable for wind development. There is considerable intervening development of housing between the church and the area identified as suitable for wind energy development. This means it is highly unlikely that the area identified as suitable makes any contribution to the setting of the listed church. As a general point, Policy CL2.C specifies that wind turbine development will, <i>subject to compliance with other policies of this plan</i> [emphasis added], be permitted within the areas shown as suitable on the policies map. This includes policy D4 which affords protection to the historic environment, including heritage assets such as St Mary’s Church, and gives effect to national policy and legislation. If proposals for wind turbine development were to come forward in the areas identified as suitable by policy CL2, then their potential impact on heritage assets would be duly considered at the application stage.

Issue	Loss of landscape character and agricultural land for little benefit. Grade 3b agricultural land should be protected equally.
Who raised	CPRE

the issue	
No. raising the issue	1
Council response	The Council does not agree that planning for renewable and low carbon energy production is of little benefit. Increasing the amount of energy from such sources is of vital importance to secure the country's future energy supply and reduce greenhouse gas emissions in an effort to mitigate climate change. The potential impact of any future wind turbine proposals on landscape character would be addressed by policy EN2 (Landscape protection), and part D of policy CL2 provides a protection against the loss of large areas (20ha or more) of best and most versatile agricultural land.

Issue	Very special circumstances requirement for green belt development should be expanded to cover the area within policy EN3
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	This is not a comment on Policy CL2 but is addressed here because that is the policy it was raised in respect of. The need for Green Belt proposals to demonstrate 'very special circumstances' is a requirement of national policy. It is not deemed necessary or appropriate to extend this to non-Green Belt areas, such as that covered by policy EN3.

Issue	Lack of safeguards - the policy does not provide sufficient protection to ensure that the 'very special circumstances' required for Green Belt development are strictly upheld, potentially leading to the degradation of protected open spaces.
Who raised the issue	Coope, Joanne
No. raising the issue	1
Council response	This is a national policy test, but its application will be a matter for future decision makers.

Issue	Policy should be consistent with revised climate policies in the draft NPPF (Dec 2025)
Who raised the issue	Richborough (Long Lawford)
No. raising the issue	1
Council response	The plan has been produced under the legacy planning system and therefore it is not reasonable to expect its policies to fully align with emerging national policies that are yet

	to be implemented.

4.90. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend policy to limit development on grade 3B agricultural land, and landscape sensitive areas. Remove from policies map suitability for wind turbines at Churchover, Willey, Newnham and High Cross area north of Rugby.	CPRE
Add requirement for developers to demonstrate there will be no adverse impact on residential health, noise or visual amenity	Longworth, Tom
Add requirement for assessment of 'cumulative impact' where turbines are viewed alongside large-scale warehousing and housing	Longworth, Tom
Council response to modification proposals: As explained in response to the main issues, this policy specifies that wind turbine development will, <i>subject to compliance with other policies of this plan</i> [emphasis added], be permitted within the areas shown as suitable on the policies map. It is deemed that other policies provide adequate protections, and these provisions need not be repeated within CL2 itself. The council's response to CPRE's comment is set out above.	

POLICY CL3 WATER SUPPLY, QUALITY AND EFFICIENCY

4.91. 13 representations on behalf of 16 people or organisations argued that policy CL3 is unsound. One representation on behalf of one person or organisation argued that the policy is sound. The main issues for this policy are listed below.

Issue	Concerns about the implementation of Part D of the policy. It would require the instruction of a BREEAM Assessor to assess only one element of the development to demonstrate compliance with the policy.
Who raised the issue	Barberry Ansty Limited
No. raising the issue	1
Council response	The large scale of additional employment floorspace that will be delivered in the borough means that an effective policy should also cover this type of development. In the absence of an optional Building Regulation for employment development it is necessary to refer to a different identifiable yardstick. The use of this measure is recommended in the Stage 2 Water Cycle Study (document I10).

Issue	The issue of water efficiency would be better dealt with through the application of building regulations, rather than by requiring adherence to a non-statutory standard as set out in Part D of the policy.

Who raised the issue	Barberry Ansty Limited
No. raising the issue	1
Council response	We disagree and the stage 2 Water Cycle Study (I10) makes the case that there is a need to reduce the use of water resources.

Issue	Part C duplicates Building Regulations and is unnecessary.
Who raised the issue	Places for People; William Davis Homes (site 315); West Midlands Housing Association Planning Consortium
No. raising the issue	3
Council response	Part C refers to Building Regulation 36(2)(b), which is an optional requirement of 110 litres per person per day. This policy seeks to apply this optional requirement to the development of dwellings in the borough, as the evidence base highlights Rugby is in an area of water stress (see I7). A similar policy is included in the adopted local plan.

Issue	Inconsistent with emerging national policy (PM13).
Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	The plan has been produced under the legacy planning system and therefore it is not reasonable to expect its policies to fully align with emerging national policies that are yet to be implemented.

Issue	Policy is ambiguous and cannot be applied. Part A specifies that new development shall “minimise” the need for new infrastructure by being located where there is adequate water supply, but the term “minimise” is not defined. In any case, this is a matter to be addressed during the allocation of sites, not the determination of planning applications.
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	The local plan is a policy document which contains language which is to be interpreted straightforwardly. It is considered that applicants, decision takers and other stakeholders will be able to interpret what “minimise” means and is not deemed necessary to assign it a definition in the plan’s glossary. The council does not agree that water supply should only be considered when allocating sites for the plan – the matter will be just as relevant for any applications that may come forward for development at unallocated sites.

Issue	Policy requirement likely to be difficult to achieve for logistics development.
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising the issue	4
Council response	It would not be appropriate to have a blanket exemption for logistics developments from this policy. Part D of the policy already specifies that where it is demonstrated to be impracticable major new non-residential developments will not have to achieve full credits for category Wat 01 of BREEAM.

Issue	There is no guarantee that water can be supplied for a further 150 houses in Wolvey (site 309).
Who raised the issue	Reeve, Kathleen
No. raising the issue	1
Council response	Severn Trent Water have a legal duty to supply water for domestic purposes to households in the Borough, including any houses that come forward via planned growth. A Water Cycle Study (I10) has been produced in consultation with Severn Trent Water which, amongst other things, assesses the Borough's current water supply infrastructure and identifies upgrades that may be necessary to accommodate planned growth. It finds that an upgrade to the Bramcote Wolvey Booster Station will be required, and this has been captured in the Infrastructure Delivery Schedule (I2). Therefore, the council deems that it has taken the necessary steps to enable water to be supplied to sites allocated by the local plan.

Issue	Evidence (WCS) points to the need for a water efficiency standard of 100 l/p/d not 110 l/p/d.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	The Water Cycle Study (stages 1 and 2) (I7 & I10) does recommend consideration of a water efficiency standard of 100l/p/d. However, the Council considers that a policy requirement of 110l/p/d, in line with the optional Building Regulation 36(2)(b) is aligned with the current national regulatory regime. The standard proposed in the policy also fulfils what was recommended by Severn Trent Water in their response to the Preferred Option consultation.

4.92. Below is a summary of some of the modifications to the policy proposed in representations,

together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Remove part C to avoid duplication with Building Regulations	Places for People
Update wording to says that non-residential developments should achieve at least 3 credits in the Wat01 measure	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
Amend part C of CL3 to specify 100 litres per person per day instead of 110 (as recommended by WCS) and delete the reference to building regulations.	Allanach, Richard
Council response to modification proposals: For the reasons explained above the council does not support the modifications proposed by Places for People or Richard Allanach. The proposal by GLP Europe and others is effectively a reduction in the stringency of the standard for non-residential development. The council does not support this modification as it considers the proposed policy approach is justified.	

POLICY CL4 CLIMATE ADAPTATION

4.93. Eight representations on behalf of eight people or organisations argued that policy CL4 is unsound. Three representations on behalf of three people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Policy should be consistent with revised climate policies in the draft NPPF (Dec 2025).
Who raised the issue	Richborough (Long Lawford)
No. raising the issue	1
Council response	The plan has been produced under the legacy planning system and therefore it is not reasonable to expect its policies to fully align with emerging national policies that are yet to be implemented.

Issue	Green space provision is often achieved through Biodiversity Net Gain which may not be compatible with this policy.
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	We disagree that these are incompatible. Part ii of the policy and BNG have a role in adapting to climate change. Not all green spaces are exclusively for the purpose of BNG

	and a holistic design approach to any scheme should be taken.

4.94. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend to reflect revised climate policies on carbon reduction, resilience and climate obligations in the draft NPPF (Dec 2025)	Richborough (Long Lawford)
Delete policy or revise to recognise the role of BNG in the provision of green space	Vistry Group
Council response to modification proposals: The Council do not deem it necessary to adopt these modifications for the reasons given in response to the main issues above. Not all green spaces are exclusively for the purpose of BNG, and it is not deemed reasonable to expect the local plan to fully align with draft national policies that are yet to be adopted.	

POLICY E1 EMPLOYMENT LAND PROTECTION

4.95. Four representations on behalf of four people or organisations argued that policy E1 is unsound. The main issues for this policy are listed below.

Issue	Part B is unreasonably onerous with 24-month marketing requirement unsound
Who raised the issue	Panattoni and AC Lloyd
No. raising the issue	2
Council response	This part of the policy is consistent with current adopted Local Plan 2011-2031 policy ED1 which requires 24 months' marketing. This remains appropriate to ensure the policy has teeth.

Issue	Blanket prevention of alternative uses on site such as small-scale retail, food and beverage or childcare will harm marketability of employment sites
Who raised the issue	Panattoni and AC Lloyd
No. raising the issue	2
Council response	Retail and food and beverage uses are main town centre uses. These would not ordinarily be supported in employment site locations. We are not convinced that industrial locations are appropriate for childcare.

Issue	The policy would allow losses of employment land, and this would compound failure to plan for enough employment land

Who raised the issue	Richborough Commercial (M45 J1)
No. raising the issue	1
Council response	A policy which sought to prohibit losses of employment land would be inconsistent with national policy. The comment about the quantum of employment land planned for is addressed under Policy S3 above.

4.96. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend part B (i) to reduce marketing period from 24 to 12 months and change "and" to "or"	Panattoni and AC Lloyd
Expand policy to allow supporting non-employment uses where ancillary to employment use and supporting the needs of businesses and employees	Panattoni and AC Lloyd
Amend supporting text to include employment allocations	SEGRO
Council response to modification proposals: The Council considers the content of this policy to be justified as set out in response to the main issues above. Employment allocations are already referenced in the supporting text and the policy wording – it is not considered required to specify the strategic employment allocations within this policy.	

POLICY E2 EMPLOYMENT DEVELOPMENT

4.97. 31 representations on behalf of 35 people or organisations argued that policy E2 is unsound. The main issues for this policy are listed below.

Issue	Lack of support for rural employment sites outside settlement boundaries. Contrary to Economic Strategy and NPPF (paras 88 and 89) and to draft NPPF
Who raised the issue	S&D Postlethwaite; Everwell Development and Mactaggart Family & Partners; Stoford Properties Ltd; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes; Richborough Commercial (M45 J1)
No. raising the issue	9
Council response	Paragraph 88 NPPF a) states that planning policies should enable “the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings” while paragraph 89 states “Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.”.

	Policy E2 accords with the wording of paragraph 88a) by allowing the expansion/growth of rural businesses outside of settlement boundaries through conversion, expansion and infilling of vacant areas within sites (i.e. new build). The local plan will be examined under the legacy (2024) NPPF. It was prepared prior to publication of the consultation version NPPF, which remains a consultation version only. The NPPF paragraphs cited are about supporting local business needs in rural areas. These policies are not targeted at big and mid box logistics warehouses housing national distribution centres of the type being promoted by many omission site promoters in Rugby Borough.

Issue	Para C is too restrictive for office uses
Who raised the issue	S&D Postlethwaite
No. raising the issue	1
Council response	Paragraph C merely gives effect to national policy which identifies offices as a main town centre use to which the sequential test in Section 7 NPPF applies.

Issue	Policy not flexible enough to respond to market demands or unexpected changes
Who raised the issue	Richborough Commercial (M45 J1)
No. raising the issue	1
Council response	This is a similar argument to the first issue raised above. The plan has identified employment land needs and allocates sites to meet them. There are two mechanisms that allow, within a plan-led system, further land release if this is justified. The first is the requirement for 5 year plan reviews. The second is the operation of the discretionary planning system itself, this means that planning permission can be granted if material considerations indicate against determination in accordance with the development plan.

4.98. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
The policy should be modified to include a new clause enabling essential digital and data-processing infrastructure in rural or edge-of-settlement locations where operational requirements necessitate such siting	Everwell Development and Mactaggart Family & Partners
A new employment policy, E4, should be introduced which would be a	Everwell Development and

dedicated enabling policy for data centres and digital infrastructure, providing a pathway for their development.	Mactaggart Family & Partners
Amend part E to add a further criteria point "where there is evidence that during the plan period the employment allocations given in policy s7 are unable to deliver the plans identified employment needs"	Windsor Developments Limited; Windsor Developments (Site 145)
Introduce a limit on the volume of low skilled/low-income employment development	O'Connell, Mark
Give priority to lower/smaller employment developments in rural and residential areas. Where this is not possible, significant natural buffers should be created to protect the visual aspects of these areas.	O'Connell, Mark
Amend paragraph (E)(iii) to instead say: "It would address an unmet need where the site is readily and regularly accessible by means of transport other than the private car; or"	Richborough Commercial (M45 J1)
Suggested new wording (see rep) supporting development where there is evidence of need that can't be met through allocated sites in the plan	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
Delete para E	Stoford Properties Ltd
Council response to modification proposals: Many of the proposed modifications seek to enable larger development to come forward on unallocated rural sites. The council has responded to that proposal above. The Council believes the policy supports the plan-led system, with unallocated development being approved only where in categories supported by the plan or where material planning considerations and national policy permit. The council does not consider that there is evidence to support the need for a more permissive approach to data centres as distinct from other types of employment development.	

POLICY E3 RURAL ECONOMY

4.99. Three representations on behalf of four people or organisations argued that policy E3 is unsound. The main issues for this policy are listed below.

Issue	Inconsistent with national policy. Doesn't support all types of business in the rural areas and is too restrictive.
Who raised the issue	S&D Postlethwaite; Everwell Development and Mactaggart Family & Partners; J Marine Limited
No. raising the issue	4
Council response	This policy needs to be read in conjunction with Policy E2 which covers other types of employment uses in rural areas. Comments about Policy E2 are addressed above.

4.100. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications

proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
The policy should be modified to make it clear that the policy only relates to the small scale, traditional rural economy in line with paragraph 88 of the NPPF.	Everwell Development and Mactaggart Family & Partners
E3.A.vi should be deleted and replaced with "Proposals for new canal-based facilities should be directed to locations within or adjacent to defined settlements to ensure that these are sustainably located."	J Marine Limited
At the start of E3.A.i "small-scale" should be deleted to make the policy consistent with national policy.	J Marine Limited
Council response to modification proposals: The policy is compliant with NPPF para 88. Restrictions such as the reference to 'small-scale tourism' seek to ensure proposals respect the character of the countryside, in line with national policy. The proposal by J Marine Limited that all canal based facilities should only be within or adjacent to defined settlements is not supported and would be more restrictive than national policy.	

POLICY C1 RUGBY TOWN CENTRE

4.101. No main issues have been identified with Policy C1, beyond the modifications set out below.

4.102. Four representations on behalf of four people or organisations argued that the policy is sound.

4.103. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Clause B vii. could be worded to better reflect the guidance of the NPPF by stating "support the conservation and enhancement of heritage buildings and their setting".	Historic England
Add the word "retail" to para B.i.	Warwickshire County Council
Council response to modification proposals: The council agrees with both modifications proposed and these have been put forward in the schedule of proposed additional modifications in core document CD20.	

POLICY C2 MAIN TOWN CENTRE USES

4.104. Two representations on behalf of four people or organisations argued that policy C2 is unsound. One representation on behalf of one person or organisation argued that the policy is sound. The following main issues were raised with Policy C2:

Issue	Definition of employment use inconsistent with national policy (see also in the glossary)
Who	S&D Postlethwaite

raised the issue	
No. raising the issue	1
Council response	Policy C2 references ‘main town centre uses’. The definition of a main town centre use is defined in the glossary and matches exactly with the definition in the glossary of the NPPF. The definition of ‘employment use’ within the glossary of the Submission Local Plan notes that “subject to compliance with policy C2 (main town centre uses) use class E(g)(i) will also be an employment use.” There is no definition of ‘employment use’ within the glossary of the NPPF.

Issue	Policy is unenforceable - permitted development rights can be used to repurpose class E buildings for other uses
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	The existence of permitted development rights does not render the policy unenforceable, not least because main town centre uses (per the definition provided in the local plan and the NPPF) are not exclusively use class E.

POLICY C3 LOCAL AND DISTRICT CENTRES

4.105. One representation on behalf of one person or organisation argued that policy C3 is unsound. One representation on behalf of one person or organisation argued that the policy is sound. The following main issue was raised with Policy C3:

Issue	Policy is unenforceable and should be deleted - permitted development rights can be used to repurpose class E buildings for other uses
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	The existence of permitted development rights does not render the policy unenforceable, not least because main town centre uses (per the definition provided in the local plan and the NPPF) are not exclusively use class E.

POLICY C4 NEIGHBOURHOOD HUBS

4.106. No main issues were raised with Policy C4. Two representation on behalf of two persons or

organisations argued that the policy is sound.

POLICY EN1 BIODIVERSITY AND GEODIVERSITY PROTECTION

4.107. 72 representations on behalf of 74 people or organisations argued that policy EN1 is unsound. Three representations on behalf of three people or organisations argued that the policy is sound.

4.108. A significant proportion of those making representations that the policy was unsound argued that it was unsound because proposed residential site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy EN1 itself and so this hasn't been identified as a main issue.

4.109. The following main issues were raised with policy EN1:

Issue	No explicit reference to NPPF 193(c) "wholly exceptional reasons" test for development affecting irreplaceable habitats.
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	There is no need to reproduce decision-making policies from the NPPF in the local plan. EN1.A makes clear that national policy will be applied in determining planning applications.

Issue	No requirement for Root Protection Areas for ancient and veteran trees with presumption against development in these areas.
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	National policy (NPPF 193(c)) provides protection for ancient and veteran trees, and national guidance specifies that root protection areas should be established when proposed developments are near to ancient or veteran trees. We do not believe there is a need to reproduce national policy and guidance in the local plan.

Issue	Management plans should be secured by condition or legal agreement, monitoring responsibilities should be clearly defined, and enforcement triggers should be explicit where outcomes fall short.
Who raised the issue	Woodland Trust
No. raising	1

the issue	
Council response	We deem these to be matters that are to be decided and defined at the planning application stage rather than within the policy itself.

Issue	Policies map shows Local Wildlife Site (LWS) boundaries which do not reflect actual features or the areas of development or proposed development approved in the OPP. Strict restrictions on development on a LWS through this policy poses risk to build out of Houlton.
Who raised the issue	Urban & Civic
No. raising the issue	1
Council response	Local Wildlife Sites are designated by the Warwickshire Local Wildlife Sites Panel. The boundaries that we have shown for LWSs on our policies map reflect the data that has been provided to us by the Natural Capital Assessment Partnership (NCAP) on the panel's behalf – they have not been determined as part of our local plan-making process. The council raised the matter of LWS boundaries at Houlton with NCAP following the Reg 18 Preferred Option consultation. In response, they organised a walkover survey of the area in August 2025, however, currently the boundaries are yet to have been amended as a result. If LWS boundaries are subsequently amended, then the new boundary is what will be used for the purposes of decision-making. This is recognised in paragraph 5.4 of our emerging local plan which states “SSSIs, LNRs, LWSs and LGSs as at plan submission are shown on the policies map. These designations are subject to change.”

Issue	Cii is ambiguous - not clear who the decision maker is or at what stage it needs to be demonstrated.
Who raised the issue	William Davis Homes
No. raising the issue	1
Council response	We disagree. Cii is considered to align with national policy (NPPF para 193(a)).

Issue	Duplication of national policy in parts A and B
Who raised the issue	Vistry Group
No. raising the issue	1

Council response	Parts A and B only briefly refer to national policy; they do not duplicate it in any substantial manner.

Issue	Doesn't go far enough in terms of climate change, especially with the Council's declared 'Climate emergency'.
Who raised the issue	Warwickshire Wildlife Trust
No. raising the issue	1
Council response	One of the plan's objectives is to reduce carbon emissions and adapt to climate change and several policies are directed towards meeting this objective including an ambitious net zero buildings policy. Furthermore, the plan has been subject to a Sustainability Appraisal, the framework for which includes climate change mitigation and adaptation as topics. The council considers that the plan suitably addresses climate change in line with council objectives and national planning policy.

Issue	The provisions of adopted NE2 relating to blue and green infrastructure corridors have been lost without justification and contrary to national policy. It is not sufficient to simply rely on the LNRS without clear land designations for green infrastructure.
Who raised the issue	Allanach, Richard, Warwickshire Wildlife Trust
No. raising the issue	2
Council response	Policy NE2 in the adopted local plan identifies existing and potential green infrastructure corridors. Having reviewed this policy, we do not consider that it clearly directs decision makers regarding planning applications made in these corridors, and on this basis have not proposed to carry this policy into the new plan.

4.110. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Policy should specify it only applies to development which is not already permitted through an extant outline planning permission	Urban & Civic
Delete parts A and B to avoid duplication of national policy	Vistry Group
Para D needs stronger reference to the Local Nature Recovery Strategy - the word 'contribute' isn't strong enough to deliver step change.	Warwickshire Wildlife Trust
Para C needs to refer to 'Potential Local Wildlife Sites' too and shouldn't allow caveats that allow for loss important designated wildlife sites	Warwickshire Wildlife Trust
Para A should be more ambitious with regards to BNG and not just ask for the basic national requirements. Council needs to encourage over 10% as proven viable locally and is in 20% of other adopted Local Plans	Warwickshire Wildlife Trust

Plan should include grey water policies and street trees as well as green roofs and sustainable technologies on bus stops and large employment sites	Warwickshire Wildlife Trust
Buffers set out in 'Warwickshire Wildlife Trusts Buffer Paper' (included in Nuneaton's plan) should be added to Rugby plan	Warwickshire Wildlife Trust
In para C add “blue and green infrastructure corridor” to the list of sites which are not to be harmed	Allanach, Richard
Add a new paragraph E which states: “Proposals for developments in the continuous green and blue infrastructure corridor which is to be established in SW Rugby in accordance with policy S8 shall provide a framework plan demonstrating the contribution of the development to the corridor”.	Allanach, Richard
Add a new supporting paragraph: “The borough’s blue and green infrastructure corridors are those shown in the GI Green and Blue Infrastructure Policies Map and the Green Infrastructure Map in the SW Rugby Masterplan SPD”.	Allanach, Richard
Council response to modification proposals: It is not necessary to state that this (or other policies) do not apply to development with outline planning permission. Such sites can be developed in accordance with their permissions. The council does not agree with the deletion of policy requirements, for the reasons explained above. In relation to the Wildlife Trust comments, the council considers current reference to the LNRS is adequate. The council does not consider there is a clear justification for seeking to protect potential local wildlife sites given these sites haven’t been surveyed to assess whether they are worthy of designation. As explained elsewhere, the council has elected not to pursue 20% BNG. For the reason also explained above the council does not agree with Richard Allanach’s proposals to incorporate text about green infrastructure corridors.	

POLICY EN2 LANDSCAPE PROTECTION

- 4.111. 95 representations on behalf of 396 people or organisations argued that policy EN2 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound.
- 4.112. A significant proportion of those making representations argued that the policy was unsound because proposed site allocations would not accord with it. These representations do not raise soundness issues with Policy EN2 itself and so this hasn’t been identified as a main issue.
- 4.113. The main issues for this policy are listed below.

Issue	Greater clarity needed on para 5.8's links to policies D3 and D1
Who raised the issue	Hillmorton Voice Residents Association
No. raising	1

the issue	
Council response	It is assumed that the consultee has mistakenly referred to paragraph 5.8 instead of paragraph 5.6. The Council does not believe that further explanation of the links between EN2 and D3 and D1 needs to be given for the policy to be sound.

Issue	Cross-boundary impacts of landscape not considered - policy should address receptors beyond Rugby e.g. West Northamptonshire.
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	1
Council response	Policy EN2 is already formulated in a way that would allow decision-takers to account for adverse impacts on landscapes or receptors in neighbouring authority areas. For example, EN2.A states that “development shall avoid significant adverse impacts on landscape character and significant adverse visual impacts”. It does not state that only impacts within Rugby Borough should be considered.

Issue	EN2 fails to acknowledge that unavoidable landscape impacts of some developments may be acceptable if they are balanced against national or regional needs for digital infrastructure, such as data centres.
Who raised the issue	Everwell Development and Mactaggart Family & Partners
No. raising the issue	1
Council response	For all development types, judgements on planning balance are made in the determination of planning applications.

Issue	Wording is generic and overly restrictive - unclear whether aim is to protect all landscapes or those most valued
Who raised the issue	Miller Homes (Brownsover Road); SEGRO
No. raising the issue	2
Council response	The policy would apply to all landscapes. This is similar to many policies found in local plans including, for example the Uttlesford Local Plan (Core Policy 41 adopted March 2026). The policy strives for conciseness and clarity as to the test it applies and needs to be couched in general terms because of the varying types of development to which it will apply.

Issue	Part C conflates matters of landscape with heritage which should be addressed under Policy D4 for clarity and to avoid unnecessary duplication of policies as per the NPPF
Who	Miller Homes

raised the issue	
No. raising the issue	1
Council response	Although both EN2.C and D4 refer to heritage assets, the primary focus of EN2.C, which distinguishes it from D4, is on the avoidance of detrimental impacts on landscape features. It is not deemed that there is any substantial duplication across EN2 and D4.

Issue	Policy should be supported by further evidence and allow mitigation to be considered within a planning balance
Who raised the issue	SEGRO
No. raising the issue	1
Council response	It is unclear what evidence to support a development management policy like this would be. The policy allows mitigation to be considered in determining the level of impact. However, if the inspectors felt that it would be helpful to amend the policy or reasoned justification to specifically refer to mitigation then the council would support this.

Issue	Strengthening of monitoring, management and enforcement required
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	This comment relates to the implementation of the policy rather than the policy itself.

Issue	EN2 fails to acknowledge that unavoidable landscape impacts of some developments may be acceptable if they are balanced against national or regional needs for digital infrastructure, such as data centres
Who raised the issue	Everwell Development and Mactaggart Family & Partners
No. raising the issue	1
Council response	This comment misunderstands how policies are applied. Section 38(6) allows a determination of whether a proposal is in accordance with the local plan read as a whole, bearing in mind that policies may pull in different directions. The legal framework also allows other material considerations including national policy to outweigh conflict with local plan policies or specific identified harms.

4.114. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
The policy should be modified to state that certain proposals for essential digital infrastructure may be supported where residual landscape effects are outweighed by demonstrable national or regional need.	Everwell Development and Mactaggart Family & Partners
Change "development shall avoid" to "development should seek to avoid"	Rosconn Group
Policy should be supported by further evidence and allow mitigation to be considered within a planning balance	SEGRO
Add acknowledgment of or requirement for mitigation measures to enable robust proposals to come forward	Miller Homes (Brownsover Road)
Council response to modification proposals: For the reasons explained above, the council does not support these modifications. It is not appropriate nor would it be consistent with national policy for a landscape policy to seek to apply a different standard to a particular category of development such as data centres.	

POLICY EN3 RAINSBROOK VALLEY LANDSCAPE OF ELEVATED SENSITIVITY

4.115. 14 representations on behalf of 312 people or organisations argued that policy EN3 is unsound. 15 representations on behalf of 898 people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Policy is politically motivated and not based on justified evidence.
Who raised the issue	Edwards, Claire
No. raising the issue	1
Council response	The policy is supported by a landscape sensitivity assessment (EN3) undertaken by a suitably qualified team at an independent consultancy. The assessment method (which accords with relevant national guidance), findings, and analysis are transparently laid out in the report, which the council deems to constitute sound evidence that justifies the policy.

Issue	Policy conflicts with NPPF 11a to promote sustainably located development - avoids highly sustainable urban edge sites and led to increased Green Belt allocations.
Who raised	Edwards, Claire

the issue	
No. raising the issue	1
Council response	Policy EN3 does not inherently contradict NPPF paragraph 11a which specifies that plans should promote a sustainable pattern of development. The council considers that the strategy for homes and residential allocations it has proposed in the submission local plan represent a sustainable pattern of development.

Issue	Consideration should be given to development outside the designated area that could adversely impact its setting or views.
Who raised the issue	Cotton, Stephen & Dawn; J Marine Limited
No. raising the issue	3
Council response	The council deem that such a provision would be overly restrictive and not adequately supported by the available evidence.

Issue	Extent of the area designated should be larger and/or policy should specify that developments near to the area will not adversely impact it.
Who raised the issue	Barby and Onley Parish Council; Willoughby Parish Council; J Marine Limited
No. raising the issue	3
Council response	The area included extends to the administrative boundary of Rugby Borough Council to the south. The remit of the Rugby local plan does not extend into the neighbouring administrative area of West Northamptonshire, and the area cannot be extended in this direction. Through discussions with West Northamptonshire Council under the duty to cooperate, and as noted in the Statement of Common Ground with the same authority (SOCG8), we are exploring potential to have a joined-up approach across the administrative boundary in respect of the Rainsbrook Valley.

Issue	The policy is not based on proportionate evidence. The 2025 study is based on a flawed methodology that does not adequately account for differences across land parcels.
Who raised the issue	Tarrant, John; Kang, Jane; Dunchurch Park Estates Ltd
No. raising the issue	3
Council response	The Rainsbrook Valley Landscape Sensitivity Assessment (EN3) was undertaken by suitably qualified independent specialists and follows relevant guidance on the

	preparation of such studies. It takes a different methodological approach to the previous landscape study of the valley produced in 2017, which considered individual land parcels. It is noted in document EN3 in the introduction on page 5: " <i>A previous Landscape Sensitivity Assessment was undertaken for a proportion of the valley in 2017. This report provides an up to date appraisal, using a methodology aligned to revised technical guidance published in the intervening period.</i> " It goes on to specify that positions are taken in relation to the sensitivity and susceptibility of the Rainsbrook Valley as a whole.

Issue	Policy approach unsound without ability to apply at site specific level. Policies D1, D3 and EN2 demonstrate that EN3 serves little purpose.
Who raised the issue	Persimmon Homes (Central)
No. raising the issue	1
Council response	We disagree. The Rainsbrook Valley Landscape Sensitivity Assessment (EN3) concludes the valley has elevated landscape sensitivity and this policy is designed to respond to this specifically.

Issue	Not consistent with key national policies including the presumption in favour of sustainable development.
Who raised the issue	Dunchurch Park Estates Ltd
No. raising the issue	1
Council response	The representation is critical of the introduction of policy EN3 and the evidence which underpins it. The council considers the evidence to have been appropriately prepared by qualified specialists. This work was commissioned following feedback and representations made at Regulation 18 stage, and underpins policy EN3. The council does not agree that this policy is in conflict with the presumption in favour of sustainable development or other national policy cited in the representation. The policy seeks to afford the area a higher degree of consideration in decision making.

Issue	Susceptibility based on vague and generic assumptions such as 'schemes of 50+ dwellings' - risk that this is based on a worst case scenario in terms of height and density
Who raised the issue	Dunchurch Park Estates Ltd
No. raising the issue	1
Council response	This comment refers to the evidence base, document EN3. The explanation for the type of development assumed is explained on page 63 of that document.

Issue	Limited differentiation between edge of settlement areas and open valley countryside
Who raised the issue	Dunchurch Park Estates Ltd
No. raising the issue	1
Council response	The map on page 65 of document EN3 shows some differentiation in sensitivity at the settlement edge. Ultimately, this is a criticism of the detailed findings of the study. The council does not agree with that criticism.

Issue	Policy approach unsound without ability to apply at site specific level. Policies D1, D3 and EN2 mean that EN3 serves little purpose. The representation from Persimmon Homes is accompanied by a Landscape Sensitivity Assessment of Land East of Barby Lane (RPS 2026). The evidence submitted by the omission site promoter states that the omission site has medium/low sensitivity - consistent with Lepus study.
Who raised the issue	Persimmon Homes (Central)
No. raising the issue	1
Council response	The sensitivity of individual land parcels within the area may differ, and this is reflected in the map on page 65 of document EN3. That doesn't remove the rationale for having a policy for the area. The council's view is that the valley is a recognisable (and locally recognised) landscape with heightened sensitivity that warrants additional policy beyond the baseline DM policies referred to that would apply everywhere in the borough.

4.116. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Additional wording to para F to provide direct connections from Diamond Jubilee Wood Country Park to the PRow network between Barby, Dunchurch and Hillmorton	Jurdzinski, Marcin
Strengthening and clarification of policy wording and expansion of area covered needed e.g. need to define 'adverse impact' and link to strategic policies and policies EN5 and I5	Hillmorton Voice Residents Association; Grandborough Parish Council; Jackson, Carin; Cotton, Stephen & Dawn
Refer to section 7.0 in accompanying report - Landscape Sensitivity Assessment and Review of the Rainsbrook Valley.	Persimmon Homes (Central); Catesby Strategic Land

Should be modified so as not to prohibit, limit or determine that the area is unsuitable for development.	
Should include access for horse riding on the Great Central Walk to avoid riders having to navigate busy roads	British Horse Society
Modify the policy area so that only highly sensitive landscape areas are included within it/exclude areas of lower sensitivity	Tarrant, John; Kang, Jane; Dunchurch Park Estates Ltd
Increase the extent of the area to cover the valley in full (in cooperation with West Northamptonshire) and/or amend the policy to specify that developments near to or outside of the area should not adversely impact it.	Barby and Onley Parish Council; Willoughby Parish Council; Stand against Lodge Farm village; J Marine Limited
Clarify the policy wording to specify whether the valley is a valued landscape.	Tarrant, John; Kang, Jane
Remove reference to Dunchurch Lodge as this duplicates heritage policy	Dunchurch Park Estates Ltd
Policy should make clear that temporary 'pods' in the grounds of Dunchurch Park Hotel cannot be made permanent & that any development of this site would need to undergo the same scrutiny as any other proposed development in Rainsbrook Valley	RBC Conservative Group
Policy should reflect that the Rainsbrook Valley Railway might need to add or change buildings to accommodate visitors and/or heritage equipment from time to time and policy should not block this	RBC Conservative Group
Council response to modification proposals: The comments seek either to widen or narrow the geographical scope of the policy, exempt or remove reference to certain sites or areas, or to strengthen or weaken its wording. The council does not support these amendments and considers that the policy is justified without amendments.	

POLICY EN4 AREAS OF SEPARATION

4.117. 13 representations on behalf of 15 people or organisations argued that policy EN4 is unsound.
14 representations on behalf of 897 people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Lack of justification for omission of Newton from this policy.
Who raised the issue	Dixon, Chris; Allanach, Richard
No. raising the issue	2
Council response	The reason for not assessing a potential area of separation between Newton and Rugby is given in paragraph 3.12 of the Areas of Separation Report (EN4) which states "The potential area of separation between Rugby and Newton would be reduced to a very small size should the allocations that are proposed in the emerging local plan proceed. Accounting for this, and given the presence of the Great Central Walk Local Nature Reserve and the Coton Park Pool Local Wildlife Site, which already act to constrain development, it is considered that an area of separation in this location is unlikely to serve

	a significant role.”

Issue	EN4 is unsound because it is not based on proportionate evidence, fails to meet the tests of justification and effectiveness, and is not supported by national policy. The Areas of Separation Study does not robustly support the extent of the Area of Separation and does not justify the proposed boundary.
Who raised the issue	Mr and Mrs Wheeler the landowner of Land west of Medda Place; Archdiocese of Birmingham; Warwickshire Property and Development Group (site 90); Richborough Commercial (M45 J1); Warwickshire Property and Development Group (site 18)
No. raising the issue	6
Council response	Although no reference is made to areas of separation (or equivalent concepts under different names) within national planning policy or guidance, this does not inherently mean that such a policy cannot be introduced locally. Indeed, many such policies are currently adopted by local authorities, including several of Rugby Borough’s neighbouring authorities. Furthermore, the concept of areas of separation is broadly consistent with numerous provisions of the NPPF, including those outlined in paragraphs 20, 135 and 187. It is deemed that the policy is adequately justified by the Areas of Separation Study Report (EN4). The report sets out a methodology, applies this methodology with data gathered through desktop research and site visits, and then recommends potential boundaries based on an analysis of the study findings. Likewise, it is deemed that the Areas of Separation boundaries proposed by the policy are justified by the study, which identifies the land within the boundaries as playing a role in maintaining settlement separation.

Issue	Area of separation on Rugby Town policies map shows overlap of land owned by Homes England and Taylor Wimpey proposed for development as part of South West Rugby.
Who raised the issue	Homes England; Taylor Wimpey Strategic Land; Taylor Wimpey (Dunchurch)
No. raising the issue	3
Council response	A minor modification has been requested to amend the area of separation boundary, as detailed in the ‘Schedule of suggested modifications ‘(CD20). This amendment has been drawn against the latest available masterplan for South West Rugby as a reference. The area that includes the Homestead Link Road and its adjacent green landscaping remains within the area of separation; this is identified as a buffer zone in the South West Rugby Masterplan SPD, and it is deemed appropriate for it to be covered by the Areas of Separation designation.

Issue	Area of Separation around Clifton is unjustified by proportionate evidence (including because areas of high flood risk already prevent coalescence with Rugby)
Who raised the issue	Archdiocese of Birmingham; Richborough (Clifton upon Dunsmore)

No. raising the issue	2
Council response	The Areas of Separation Study Report (EN4, pp. 13-14) acknowledges that there are areas between Clifton-upon-Dunsmore and Rugby that are within Flood Zones 2 and 3. However, it is not deemed that their presence annuls the case for a designated Area of Separation between the two settlements.

Issue	South West Rugby is already causing Dunchurch to be absorbed into Rugby by removing the separation - this has been tested at examination of the adopted local plan and there is no rationale to retain superficial separation along this boundary.
Who raised the issue	Taylor Wimpey (Dunchurch)
No. raising the issue	1
Council response	While the development of South West Rugby will reduce the degree of separation between Dunchurch and Rugby, it is not agreed that Dunchurch will be ‘absorbed’ into Rugby as a result. This position is acknowledged in Policy DS8 of the adopted local plan which states “Development proposals shall respect and maintain a physical and visual separation between Rugby town and Dunchurch to prevent coalescence and protect their individual character and identity. A significant buffer between Rugby and Dunchurch, which incorporates a Green Infrastructure Corridor from Cock Robin Wood to Cawston Spinney, as identified in the South West Rugby Masterplan SPD, must form an integral part of proposals for the site.” It is not agreed that the degree of separation which policy EN4 seeks to protect, which includes the buffer previously established by policy DS8, as well as additional land identified by the Areas of Separation Study Report, is superficial. This separation is of importance to prevent the coalescence of Rugby and Dunchurch and is valued by a substantial proportion of residents, particularly those of Dunchurch, as evidenced by consultation responses.

Issue	B4429 and M45 already provide a clean break between Thurlaston and Rugby making an Area of Separation unjustified.
Who raised the issue	Taylor Wimpey (Dunchurch)
No. raising the issue	1
Council response	The role that the B4429 (Coventry Road) and M45 play as physical features of separation between Rugby and Thurlaston is acknowledged in the Areas of Separation Study Report (EN4). However, it does not follow that if development were to occur on either side of these roads within the proposed Area of Separation, that the degree of separation of the village from the town would not be diminished.

Issue	Lack of consultation on policy prior to Reg 19 is contrary to the Council's Statement of Community Involvement and NPPF para 16 which advises that plan-making should "be shaped by early, proportionate and effective engagement between plan-makers and communities, businesses"
Who raised the issue	Richborough (Clifton upon Dunsmore); Warwickshire Property and Development Group (site 90); Warwickshire Property and Development Group (site 18)
No. raising the issue	3
Council response	The Statement of Community Involvement (SCI) specifies that a Regulation 18 consultation and Regulation 19 consultation will be undertaken for the local plan, each to last a minimum of 6 weeks. The Council has fulfilled this commitment; indeed, two Regulation 18 consultations were undertaken rather than one. It is not deemed that the SCI or the NPPF paragraph cited above are to be interpreted as meaning that no policies can be introduced between the Regulation 18 and Regulation 19 stages.

Issue	Evidence report does not list criteria used to assess "the identity and distinctiveness of settlements". Methodology lacks transparency and a scoring mechanism. Unclear what specialist technical input from heritage, conservation and landscape experts has been included. Disagreement with assessment of sites.
Who raised the issue	Richborough (Clifton upon Dunsmore); Midlands Land Portfolio; Warwickshire Property and Development Group (site 90); Richborough Commercial (M45 J1); Warwickshire Property and Development Group (site 18)
No. raising the issue	5
Council response	The Areas of Separation Study Report (EN4) was produced by planning officers without additional input from specialist heritage, conservation or landscape experts. There is currently no nationally prescribed method for assessing areas of separation (or similar concepts with alternative names), and therefore the methodology adopted was similar to that used in other published studies. It was not deemed necessary or a prudent use of public resources to commission additional specialist technical input on the implementation of this methodology, or the development of a policy whose primary purpose is to prevent the coalescence of settlements. Ultimately the decision about the contribution that land makes to maintaining separation, and therefore the proposed boundaries of the areas of separation, is a matter of professional judgement.

Issue	Creates quasi green belt in terms of key elements of its intended function. Potential significant consequences for securing sustainable development in areas which are not incumbered by a green belt designation. Site doesn't meet bar for Green Belt designation.
Who raised the issue	Midlands Land Portfolio; Richborough Commercial (M45 J1)
No. raising the issue	2
Council	Local areas of separation policies (or similarly named local designations that serve a

response	similar purpose) are well established. Many adopted local plans feature such a policy, including those of several of Rugby Borough's neighbouring authorities. It is deemed that the proposed policy is not the same as Green Belt policy and that the principle of its establishment is sound. Furthermore, it is not considered that the policy prevents a strategy for a sustainable pattern of development from being progressed, as is achieved by the local plan's proposed allocations.

Issue	Policy not legal compliant because not considered in Sustainability Appraisal report and because council contrary to s19 PCPA 2004 failed to have regard to national policies and guidance issued by Secretary of State.
Who raised the issue	Richborough Commercial (M45 J1)
No. raising the issue	1
Council response	It is not deemed that the policy does not have regard to national planning policies and guidance. As it acknowledged in the Areas of Separation Study Report (EN4) and in responses to prior representations, although no reference is made to areas of separation (or equivalent concepts under different names) within national planning policy or guidance, this does not inherently mean that such a policy cannot be introduced locally. Indeed, many such policies are currently adopted by local authorities, including several of Rugby Borough's neighbouring authorities. Furthermore, the concept of areas of separation is broadly consistent with numerous provisions of the NPPF, including those outlined in paragraphs 20, 135 and 187. The Sustainability Appraisal report at para 4.2.6 comments on the appraisal of development management policies as follows: "it is a challenge to define "reasonable" DM policy alternatives, and, in this case, none are identified following discussion with Officers". There is no issue of legal compliance in relation to this policy not being specifically assessed in the SA report.

Issue	Argue policy wouldn't serve a clear purpose and there is no national policy support for such policies.
Who raised the issue	Richborough Commercial (M45 J1)
No. raising the issue	1
Council response	It is deemed that the policy serves the purpose of preventing the coalescence of settlements and protecting their identity and distinctiveness. Although no reference is made to areas of separation (or equivalent concepts under different names) within national planning policy or guidance, this does not inherently mean that such a policy cannot be introduced locally. Indeed, many such policies are currently adopted by local authorities, including several of Rugby Borough's neighbouring authorities. Furthermore, the concept of areas of separation is broadly consistent with numerous provisions of the NPPF, including those outlined in paragraphs 20, 135 and 187.

Issue	Policy is unsound as it is clear from the plan that all fields will be filled in with development between Bilton/Cawston and Dunchurch. Any area of separation must be so insignificant that it is not even visible on the plan. Dunchurch will become another suburb of Rugby town on the current plan.
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council response	Much of the area that currently separates Rugby from Dunchurch and Thurlaston will be occupied by the South West Rugby urban extension. However, it is not the case that this will cause any area of separation to be so insignificant that it is not even visible on the plan, as can be seen by the presence of the proposed area of separation on the policies map.

4.118. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Policy area should be expanded to include the gap to the west of Newton with Brownsover and Coton Park	Dixon, Chris
The Area of Separation boundary around Dunchurch and Thurlaston should be redrawn to exclude Sections A and B and instead define Coventry Road as the boundary.	Mr and Mrs Wheeler the landowner of Land west of Medda Place
Amend the policies map for this policy to reflect the application red line boundary for Homes England's parcel in South West Rugby and Taylor Wimpey's ownership	Homes England; Taylor Wimpey Strategic Land
Supporting text should recognise that Area of Separation forms part of the wider countryside and landscape framework	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Amend wording to strengthen application by requiring developments to maintain a clear and defensible physical and visual gap between settlements, with additional test for this (see rep for proposed wording)	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Amend supporting text to define 'significant adverse impact' (see rep for full suggested wording)	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
Remove Area of Separation around Clifton, failing that amend wording to improve flexibility and allow for more housing to come forward around Clifton if required	Archdiocese of Birmingham
Delete reference to other 'existing developments' in section B and reference to 'an urbanising influence' in section C as this is not the purpose of an area of separation	Taylor Wimpey (Dunchurch)

Clifton area of separation should be continued north of its current boundary on Newton Manor Lane to abut the Great Central Way. It would then include St Thomas Cross Fields public open space and area of farmland west of the village.	Davis, Ian
A larger area of separation should be included so that there is a visible area of green land between Rugby town/suburbs & Dunchurch.	O'Connell, Mark
A purpose statement should be added to the policy: "The purpose of Areas of Separation is to maintain the physical and visual distinction between Rugby town and surrounding settlements, safeguarding their individual identity, preventing coalescence, and contributing to strategic green infrastructure connectivity".	Allanach, Richard
Council response to modification proposals: As explained in the main issue responses, the council does not agree with the proposals to expand or retract the boundaries of the areas of separation, except for the minor modification at South West Rugby proposed by Homes England, which has been adopted into the schedule of suggested modifications (CD20). It is considered that the land which is covered by the proposed areas are of importance for maintaining settlement separation, and it is deemed that the rationale for excluding the area between Newton and Rugby from consideration, as stated in paragraph 3.12 of the study (EN4), still stands. It is not deemed necessary to specify that areas of separation form part of the wider countryside and landscape. Per the policies map, it is clear that the areas themselves and some of land that is adjacent to them is part of the countryside (per policy S5), for which policy EN2 (landscape protection) will also have a bearing. The council does not agree that references to existing developments (as they relate to cumulative impacts) and urbanising influences should be deleted from the policy. Both are deemed of relevance for decision-takers when considering the impacts that proposed developments may have on the effectiveness of the proposed areas of separation. It is deemed that the purpose of the policy in preventing the coalescence of settlements and protecting their distinct identities is already made adequately clear. The policy is not designed to contribute to green infrastructure connectivity and therefore it is not considered appropriate to amend the policy to reflect this purpose.	

POLICY EN5 BIODIVERSITY NET GAIN

4.119. Seven representations on behalf of seven people or organisations argued that policy EN5 is unsound. Four representations on behalf of four people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	10% is too low due to existing low woodland cover - 20% would be more appropriate
Who raised the issue	Woodland Trust

No. raising the issue	1
Council response	The council has considered the potential to set a higher percentage as it is understood some councils are pursuing. However, it has elected not to pursue such a policy. This decision does not raise an issue of soundness with the plan submitted.

Issue	Management plans should be secured by condition or legal agreement, monitoring responsibilities should be clearly defined, and enforcement triggers should be explicit where outcomes fall short.
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	This matter is more appropriately addressed at planning application stage.

Issue	Oxford Canal and scarp edge in Hillmorton should be designated as green/blue infrastructure corridors as in the 2019 Local Plan.
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	These areas were not designated as green/blue infrastructure policies in the 2019 Local Plan but as “potential corridors”. The council took the view that the 2019 policy did not clearly set out how decision makers should respond to proposals in this area. Therefore, the council has proposed a clearer policy for this area in Policy EN3. This comment does not raise an issue of soundness.

Issue	Oxford Canal in Hillmorton should be designated as a conservation area and wildlife corridor to mirror assessment made by West Northamptonshire Council.
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	Noted. It is the Council’s intention to commission a Conservation Area Appraisal of the Oxford Canal, though this will be separate from the local plan process.

Issue	Policy duplicates requirements of Environment Act and/or national policy and should be deleted.
Who raised	Barberry Ansty Limited; Tritax Park Rugby West Limited; Vistry Group

the issue	
No. raising the issue	3
Council response	This is not correct. The policy sets locally specific policy in its reference to the Local Nature Recovery Strategy and to delivering off-site mitigation within the borough.

Issue	Doesn't accord with NPPF para 193
Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	The representor's argument is that the policy does not accord with national policy. The representor argues that credits can be purchased anywhere and this should be left to developer's discretion provided NPPF para 193 is passed. The representor's comment does not explain why there is perceived to be a conflict with para 193 NPPF as this is not apparent. There is no conflict with national policy in the council setting out where it would want to see biodiversity net gain delivered.

Issue	Mitigation of biodiversity loss by passing gains to other sites is not sufficient to protect sites in the borough.
Who raised the issue	Foss, Jeremy
No. raising the issue	1
Council response	This comment is a criticism of the operation of the biodiversity net gain system under the Environment Act, it does not raise a soundness issue with the Rugby Borough Local Plan.

Issue	The pre-development biodiversity value of the site, which there should be a greater than 10% net gain on, is measured once the site has been prepared for development, not the original site prior to commencement of work.
Who raised the issue	Foss, Jeremy
No. raising the issue	1
Council response	This is not correct. However, this comment relates to the operation of the legislation rather than the soundness of the local plan.

4.120. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed

modifications.

Modification summary	Proposer(s)
Amend para 5.11 supporting text to delete words "a minimum" before 10% to align with Environment Act	Barberry Ansty Limited
Council should reserve the right to amend policy text to reflect anticipated legislative changes	Avon Timber Builders Ltd
Biodiversity should be protected within the bounds of a site, not passed to other sites.	Foss, Jeremy
Council response to modification proposals: The words “a minimum” do not create any conflict with national policy of legislation, they merely demonstrate that the council is receptive to proposals for BNG that is higher than the statutory floor. The council cannot amend a policy other than through the local plan process. The council’s response to Mr Foss’ comment is set out above.	

POLICY EN6 CANOPY COVER

- 4.121. 15 representations on behalf of 19 people or organisations argued that policy EN6 is unsound. Three representations on behalf of 136 people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Lack of explicit reference to location of canopy cover delivery, in addition to quantity. Tree Equity Scores should be referenced, requiring minimum 75 for each LSOA.
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	The policy would only be applied in the determination of planning applications. Therefore, the location of the canopy cover would be determined by where planning applications to which it is applicable are submitted.

Issue	Management plans should be secured by condition or legal agreement, monitoring responsibilities should be clearly defined, and enforcement triggers should be explicit where outcomes fall short.
Who raised the issue	Woodland Trust
No. raising the issue	1
Council response	Noted. The suggested requirements are considered relevant to the determination of planning applications and are beyond the scope of the local plan.

Issue	20% canopy cover is onerous and will make sites unviable and/or lacks sufficient evidence to demonstrate its achievability and justification.
Who raised the issue	Inside Land Group; Tritax Park Rugby West Limited; William Davis Homes (site 315); Vistry Group; Catesby Estates (Site 136); Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	6
Council response	The viability of the policy was considered in the viability study (document l1) which applied cost allowances for green roofs as a proxy for the policy. Justification of the policy is the low level of existing tree canopy in the borough and the clear benefits of tree canopy to health, air quality and climate change adaptation and mitigation. It should be noted that similar policies have been implemented in adopted local plans in Cornwall and Colchester. Para 5.17 of the supporting text makes clear that the policy will not be applied in a doctrinaire way and there may be circumstances in which it cannot be achieved. However, this does not undermine the reasons for having the policy. It is also important to recognise that street trees, biodiversity net gain areas and natural and amenity green spaces under open space policy can all contribute to meeting this target.

Issue	Planning at the required scale may not be deliverable together with required floorspace on all sites where there are constraints like easements and flood risk.
Who raised the issue	Manse Opus and Sir Thomas Whire's Charity; Barberry Ansty Limited
No. raising the issue	2
Council response	As noted above, para 5.17 of the supporting text recognises that there are some sites for which this will not be possible.

Issue	Policy wording is inflexible and may create uncertainty at application stage
Who raised the issue	West Midlands Housing Association Planning Consortium
No. raising the issue	1
Council response	Policy wording either requires something or it doesn't. If it is expressed as optional, then it is guidance not policy. This policy aims to give clarity about what is required. However, policies are not statutes and the decision making framework allows other material considerations and site-specific cases as to why a policy cannot be achieved to be made. Paragraph 5.17 specifically envisages this may happen.

Issue	Further evidence required to demonstrate how the requirement could be delivered alongside other policy requirements - e.g. EN5
Who raised the issue	Mackenzie Miller Homes
No. raising the issue	1
Council response	As noted above, the requirements of EN5, EN6 and open space through W2 are not mutually exclusive categories. Street trees, biodiversity net gain areas and natural and amenity green spaces under open space policy can all contribute to meeting this target.

4.122. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend section A to specify that 20% canopy cover will not be required where it is demonstrated to be incompatible with the minimum amount of required development and/or delivering BNG.	Inside Land Group
Amend paragraph A to require "approximately" 20% canopy cover and to add: or where it is deemed not possible or desirable under individual site circumstances, an alternative level of canopy cover will be negotiated with the council.	Manse Opus and Sir Thomas White's Charity; Mackenzie Miller Homes
Incorporate wording of supporting text at paragraph 5.17 into the policy	Barberry Ansty Limited; West Midlands Housing Association Planning Consortium; Panattoni and AC Lloyd
Amend wording to say "shall seek" to increase post-development canopy cover "where possible"	Rosconn Group; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
Delete words "to at least 20% of the site area" and "Where the canopy cover of the site exceeds 20% before development, the proposal should ensure retention of at least the existing level of canopy cover."	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
Add further paragraph to require major development proposals to demonstrate	Dunchurch Parish

how canopy cover will be established, maintained and protected for minimum 30 years (see rep for full suggested wording)	Council, Thurlaston Parish Council and Action4Dunchurch
Delete para 5.19 which is irrelevant to the policy it is supposed to support, but which does not make the policy unsound.	Allanach, Richard
Council response to modification proposals: The first five proposed amendments above seek to varying degrees to dilute the policy or introduce greater flexibility. For the reasons explained above the council does not agree that these modifications are needed to address an issue of soundness. Dunchurch Parish Council and others propose a maintenance period. Given that canopy cover is likely to form part of biodiversity net gain areas and/or public open space under policy W2, which contain requirements for maintenance periods, a separate maintenance provision requirement under the canopy cover policy is considered unnecessary. The council does not agree with the deletion of para 5.19 of the reasoned justification.	

POLICY EN7 FLOOD RISK

4.123. Eight representations on behalf of eight people or organisations argued that policy EN7 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Policy is inconsistent with new national policy that sequential test need not apply where a site-specific flood risk assessment demonstrates that a site can be safe for lifetime and not increase flood risk elsewhere.
Who raised the issue	Tritax Park Rugby West Limited; Miller Homes (Brownsover Road)
No. raising the issue	2
Council response	There is no inconsistency. Paragraph A of the policy clearly defers to national policy. National policy includes the above mentioned statement.

Issue	Parts A and B repeat national policy.
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	The policies signpost to national policy, they do not repeat it in any substantive way.

Issue	Part C prevents any development within 8m of a watercourse - does not account for infrastructure which may be needed such a culvert for drainage.
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	The reference “built development” would implicitly exclude drainage works or other infrastructure.

Issue	Policy would conflict with allocated development coming forward e.g. site 64 requires access ways to cross a watercourse.
Who raised the issue	Panattoni and AC Lloyd
No. raising the issue	1
Council response	This raises the same issue as the preceding one, see above response.

4.124. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend policy so it is consistent with national policy that sequential test need not apply where a site-specific flood risk assessment demonstrates that a site can be safe for lifetime and not increase flood risk elsewhere.	Tritax Park Rugby West Limited; Miller Homes (Brownsover Road)
Add text to part C to allow development within 8m edge of a watercourse where effective realisation of an allocation relies on the crossing or of other works to an existing watercourse or main river	Panattoni and AC Lloyd
Add stronger wording of enforcement within the plan to ensure that drainage is not missed or becomes an after thought	O'Connell, Mark
Council response to modification proposals: As stated above, there is no inconsistency with the national policy mentioned. In relation to development within 8m of a watercourse, the council considers it implicit that this would not prevent drainage works and other site infrastructure. However, if the inspector(s) consider it necessary to make this explicit through modification of the policy text or addition to the reasoned justification then the council would not oppose that. The policy is applied through the determination of planning applications; in this context it is not clear what the respondent means by stronger enforcement.	

POLICY EN8 ENVIRONMENTAL PROTECTION AND AMENITY

4.125. No main issues were identified for policy EN8. Four representations on behalf of four individuals or organisations argued the policy is unsound on the basis that proposed site allocations would not accord with it. Three representations on behalf of three people or organisations argued that the policy is sound.

POLICY EN9 AIR QUALITY

4.126. One representation argued that policy EN9 is unsound and should be modified (see below) and one representation argued that the policy is sound.

4.127. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Plan needs to detail the methods to maintain air quality, it's measurement over periods of time, the mandates to developers in order to maintain or improve air quality, the factors and causes to be monitored and what pollutants are to be included.	Foss, Jeremy
Council response to modification proposals: This is considered to be a greater level of detail than the plan would provide. The supplementary planning document referred to at paragraph 5.31 provides some of this detail. No modification is considered necessary to address an issue of soundness.	

POLICY H1 HOUSING MIX

4.128. Eight representations on behalf of eight people or organisations argued that policy H1 is unsound. Five representations on behalf of five people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	The exact reference to Housing Needs Evidence (2025) is too rigid and risks becoming outdated within the plan period
Who raised the issue	Davidsons Homes; Vistry Group
No. raising the issue	2
Council response	Part A of the policy references the Housing Needs Evidence (2025) (SD3) and “...any other appropriate local evidence.” This would allow for updated evidence to be referenced.

Issue	The table at 6.1 includes for an element of social or affordable rent for over 65s. Policy H2 sets out a mix for social rent and shared ownership. No guidance given regarding the split of rented element of housing that should be for over 65s (between social rent and shared ownership). Clarification requested.

Who raised the issue	Tritax Park Rugby West Limited
No. raising the issue	1
Council response	Table 6.1 refers to the evidence set out in the Updated Housing Needs Evidence (2025) (document SD3). It specifies a 50/50 split of 1 and 2 bedroom social or affordable rent homes for persons 65 and over. Document EN3 does not provide a target for the proportion of social or affordable rent housing that is for over 65s. Therefore, table 6.1 should be understood as providing evidence on the unit size mix for over 65s rented affordable housing, where this is provided.

Issue	Given the emphasis in this plan on creating large employment sites with mainly low paid workers, the mix of affordable housing will be insufficient. It is also counter to H8 with regards to HMOs because the unavailability of affordable housing will increase the use of HMOs in the area.
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council response	The housing needs of the borough is identified in the Housing Needs Evidence (SD3) as set out in the policy, and the Homes-Jobs Alignment Paper (I2) addresses the inter-relationship between homes and jobs. A similar comment relating to policy H8 (HMOs) is addressed under the main issues attributed to that policy.

4.129. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend policy with a new paragraph C to state "New housing development comprising only of affordable houses shall provide a mix of housing type and size and shall meet the provisions of Policy H2(B-E)."	Inside Land Group
Amend policy wording so it refers to the latest housing evidence, instead of Housing Needs Evidence (2025)	Davidsons Homes; Davidsons (Long Lawford); Newton LDP; Avon Timber Builders Ltd
Clarify what proportion of housing should be for over 65s	Tritax Park Rugby West Limited
Amend policy to allow for flexibility of mix depending on local circumstances	Vistry Group

Volume of affordable housing required to be increased significantly if more warehouses and similar employment sites continue to be built and policy H8 is to be implemented	O'Connell, Mark
Council response to modification proposals: The council does not consider an amendment to cover wholly affordable schemes is needed. As referenced in the main issues section above, the policy already offers flexibility for specific circumstances or changes over time by permitting the use of “any other appropriate local evidence”, as defined in supporting text 6.3, in informing housing mix. In combination with H2, it is considered this policy provides sufficient guidance in determining the starting points for appropriate housing mix.	

POLICY H2 AFFORDABLE HOUSING

4.130. Thirteen representations on behalf of thirteen people or organisations argued that policy H2 is unsound. Four representations on behalf of four people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Viability assessment underestimates cost of former agricultural land, artificially increasing greenfield and Green Belt affordable housing deliverability
Who raised the issue	Edwards, Claire
No. raising the issue	1
Council response	The viability assessment explains how benchmark land values are calculated. They are not considered to be over-inflated.

Issue	Cost of BNG is not factored into the costs of delivering affordable housing on Green Belt land
Who raised the issue	Edwards, Claire
No. raising the issue	1
Council response	The Viability Report (I1) factors in policy compliance of the whole plan and concludes that 40% affordable housing can viably be accommodated on land released from the green belt in most scenarios (see key findings in para 1.7).

Issue	Policy is focused on housebuilders' viability rather than residents' needs - affordable housing more appropriate in sustainable and well-connected areas with access to amenities
Who raised	Edwards, Claire

the issue	
No. raising the issue	1
Council response	This comment is considered as opposition to provision of affordable homes in settlements beyond Rugby, as policy H2 indicates a higher proportion of affordable housing should be provided on sites 'elsewhere in the borough' than in the Rugby urban area. This is similar in principle to the approach in adopted policy on affordable housing in the current local plan, and draws upon evidence presented in the Viability Study (I1).

Issue	Policy should not apply to villages. Provision at villages to meet needs of those with a social connection should be under H4
Who raised the issue	CPRE
No. raising the issue	1
Council response	We disagree. Given the acute affordable housing need in the borough identified in the Updated Housing Needs Evidence (SD3), it is considered appropriate for affordable housing to be brought forward in a range of locations. This is consistent with existing policy in the adopted local plan, and viability evidence (I1) that a greater proportion of affordable housing can generally be viably supported outside the urban area of Rugby. Furthermore, additional requirements for affordable housing on land released from the green belt (including green belt land releases around villages) are set out in national policy (NPPF paragraphs 67 and 68). To exclude villages from this policy would therefore be inconsistent with the NPPF.

Issue	Shortfall of approximately 10 affordable homes per year based on the targets and correct requirement figures
Who raised the issue	Mr and Mrs Hudson
No. raising the issue	2 (1 representation)
Council response	This comment is framed within a representation in relation to policy S2, which essentially argues that allocations in the spatial strategy would not deliver to meet the evidenced affordable housing need, and argues for an uplift in overall housing provision. This is already addressed in response to policy S2 above, and evidenced in the Development Needs Topic Paper (SD11).

Issue	Council applying a constrained approach - fails to support existing housing projections. No evidence base for the number of affordable homes over the plan period. It is reliant on large sites (e.g. SW Rugby) where achievability contested.
Who raised	Persimmon Homes (Central)

the issue	
No. raising the issue	1
Council response	This representation challenges inputs to the Updated Housing Needs Evidence (SD3) and paragraph 2.50 of the Development Needs Topic Paper (SD11). It argues that local housing need fails to support existing population projections and would lead to increased out-migration through under delivery, especially when considered in the context of a lack of affordable housing achievability on strategic scale sites. Given that the same representation (at para 9.3) states agreement with the proportions of affordable provision within the policy (part A) and the proposed tenure split (part B), and the representation conclusion is that additional allocations should have been included (specifically at Hillmorton), it is considered that these comments are already addressed under policy S2 above.

Issue	Exclusion of older persons' housing from this requirement is unsound. Sites where it would be unachievable should be removed
Who raised the issue	Willis, Tim
No. raising the issue	1
Council response	The exclusion of specialist older persons accommodation from part A of the policy is based on the viability assessment (document I1) the appraisal results of which show housing for the elderly typologies as unviable in all scenarios tested. This is also consistent with the adopted CIL charging schedule and the evidence that underpinned it. The Updated Housing Needs Assessment (SD3) sets out the evidence of local need for this type of housing. It is therefore considered that this strikes a balance to allow specialist older persons accommodation to come forward.

Issue	Greater flexibility needed in the policy text to ensure the policy is applied proportionately and remains effective under different site-specific circumstances
Who raised the issue	Richborough (Long Lawford); Miller Homes; Places for People; Rosconn Group
No. raising the issue	4
Council response	Representations challenge that the flexibility described in paragraphs 6.5 and 6.6 of the supporting text are not incorporated in the policy text, and that this flexibility is fundamental to ensuring the policy is flexible and consistent with national policy. They argue that the policy is unsound without modification to address this. The Council considers that the supporting text is clear about how the policy will be applied. There is no inconsistency with national policy and no modification is needed. National policy at para 59 already sets out the circumstances in which departures from local affordable housing

	policy may be justified, there is no need to repeat this in local plan policy.

Issue	Policy will not deliver the 75% provision identified in the Housing Needs Evidence due to being led by viability not need
Who raised the issue	Vistry Group
No. raising the issue	1
Council response	This representation asserts that the projected affordable housing would not meet the identified need, and does not explicitly challenge the content of policy H2 itself. It is considered that this issue is addressed under policy S2.

Issue	Viability assessment should test typologies of 200-500 homes as there are 5 allocations in this size range. Errors in Lodge Farm appraisal assumptions also argued.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	These points are addressed in Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation (document I15). The Local Plan Viability Study (I1) tests a range of sites from 5 units to 700. At the larger end of this scale, we have tested schemes of 200, 500, 600 and 700 units. The representation appears to be suggesting that the viability of schemes that sit somewhere between the range of 200 to 500 units would be markedly different from the outputs of the lower and higher end of the range. Document I15 tests and amended Typology 16 to 300 and 400 units and the outputs for price point I (£4,325 per square metre), together with the outputs for the original Typology 16 (200 units) and 18 (500 units). As would be expected, the residual land values for 300 and 400 units sit in between the range previously identified by the appraisals for 200 and 500 units.

Issue	Inconsistency between policies H1 and H2 - no reference to affordable rent under H2 but is referred to under H1. Wider pool of options helps meet local need more effectively
Who raised the issue	West Midlands Housing Association Planning Consortium
No. raising the issue	1
Council response	The Updated Housing Needs evidence (SD3) sets out the evidence for policy H2. It identifies the greatest need for social rented housing.

	With specific reference to affordable rent, paragraph 5.78 of SD3 suggests that homes for affordable rent may be accepted where supported by site specific evidence. Adjustments to tenure (in addition to unit size and mix) which may form part of an open-book viability assessment, are referenced in paragraph 6.5 of the policy's supporting text.

Issue	Instances of difficulty sourcing tenants for affordable housing in areas with limited public transport access
Who raised the issue	West Midlands Housing Association Planning Consortium
No. raising the issue	1
Council response	Noted. The development strategy seeks to direct development to the town of Rugby and Main Rural Settlements. The Rural Sustainability Study (SD14) considers public transport provision amongst the assessment of each settlement.

Issue	Criteria D and 6.7 for offsite financial contribution is not consistent with national policy - NPPF Annex 2 confirms Affordable Private Rent should normally be delivered onsite and managed by a Build to Rent landlord
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	This comment relates to the exception for Build to Rent schemes in H2 D and 6.7 whereby they are permitted to make an off-site financial contribution as their affordable housing contribution. NPPF Annex 2 states that within Build to Rent schemes affordable housing for rent "is expected to be the normal form of affordable housing provision", known as Affordable Private Rent. The NPPF annex does not state that this type of accommodation should normally be delivered on site. Policy H2 sets out the basic tenure mix for affordable housing delivery as 70% social rent and 30% shared ownership. Social rent is prioritised over affordable rent (or affordable private rent) because it better addresses the acute need for lower-cost housing in the Borough as evidenced in document SD3. Table 5.11 in document SD3 shows that only 16% of households who are unable to afford market housing can afford 80% of market rent without benefit support, whereas 48% can afford social rent without benefit support. Neither social rent nor shared ownership is suitable for on-site delivery within build to rent schemes. Given the local evidence of need for social rented schemes, it is considered justifiable that this should be prioritised over affordable private rent. When coupled with the different financial model of built to rent schemes as referenced in 6.7 this is felt to justify accepting off-site financial contributions.

Issue	Rationale for 40% affordable housing on Green Belt sites is unclear

Who raised the issue	Avon Timber Builders Ltd
No. raising the issue	1
Council response	Paragraph 67 of the NPPF requires a specific policy requirement for the proportion of affordable homes on green belt land or land to be released from the green belt. Part (a) identifies that this should be higher than on other land not in the green belt. Part (b) requires at least 50% of housing on such land to be affordable, unless it can be demonstrated as unviable. The Viability Appraisal (I1) concludes that the proposed policy requirements of affordable housing may be viably absorbed in most scenarios alongside the cumulative effect of policies within the plan, with paragraph 1.7 specifically identifying (2nd bullet) that “...developments on sites released from the Green Belt should be able to accommodate 40% affordable housing.”

Issue	Policy will not deliver the amount of affordable housing required as shown by the evidence and is therefore inconsistent with national policy.
Who raised the issue	Allanach, Richard
No. raising the issue	1
Council response	This representation challenges whether the projected affordable housing would meet the identified need and does not challenge the content of policy H2 itself. It is considered that this issue is addressed under policy S2.

4.131. Below is a summary of some of the modifications to the policy proposed in representations, together with the council’s response. This list isn’t necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
In villages, affordable housing should be delivered on small infill sites or rural exception sites	CPRE
In criteria A delete "at least" and replace "shall" with "should"	Miller Homes
Amend policy wording to reflect paragraphs 6.5 and 6.6 and allow level and mix of affordable housing to be informed by viability evidence for the specific site, with reduced level of provision accepted in cases of demonstrated non-viability	Richborough (Long Lawford); Places for People
Amend criterion B to include affordable rent and a broader range of affordable ownership products	West Midlands Housing Association Planning Consortium
Align wording with national policy on Green Belt development including application of the Golden Rules	Miller Homes (Brownsover Road)
Reduce requirement for Green Belt sites to 30%; or 35% for both Green Belt and 'elsewhere in the Borough'	Avon Timber Builders Ltd

Amend definition of affordable housing and social rent to align with NPPF definitions	Rosconn Group
Criteria E should be moved to supporting text	Miller Homes
Add supporting text to note that the policy is viability driven and will not meet the identified needs	Vistry Group
Amend the policy to require 30% affordable housing across the borough for developments that result in ten or more new homes, and 50% for all Green Belt sites (including those of fewer than ten homes).	Allanach, Richard
Council response to modification proposals: The affordable housing proportions required by the policy have been designed to help meet the Borough's acute need, while ensuring development remains viable. The levels have been informed by the Local Plan Viability Study (I1) and introducing further flexibility undermines the ability of the policy to address affordable housing need, while increasing proportions risk under-delivery of residential sites. Supporting text 6.8 notes that the tenure mix in B is the council's starting point but that other mixes may sometimes be appropriate. It is not necessary to amend the policy to introduce greater flexibility for individual developments to make a viability case for a lower proportion of affordable housing because the NPPF para 59 already does this: "Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force." Other comments are addressed in responses to the main issues above. Overall, no modifications are needed.	

POLICY H3 RURAL WORKER DWELLINGS

4.132. No representations were received in respect of this policy.

POLICY H4 RURAL EXCEPTION SITES

4.133. No main issues have been attributed to this policy. One representation on behalf of one person or organisation argued that the policy is unsound, however this response was an objection to development in Wolvey and did not raise specific issues with this policy. One representation on behalf of one person or organisation argued that the policy is sound.

POLICY H5 REPLACEMENT DWELLINGS

4.134. No representations were received in respect of this policy.

POLICY H6 SPECIALIST HOUSING

4.135. Three representations on behalf of three people or organisations argued that policy H6 is unsound. The main issues for this policy are listed below.

Issue	Missed opportunity to allocate further sites for older persons housing which are suitable for apartments and closer to local amenities
Who raised the issue	Churchill Living & McCarthy Stone
No. raising the issue	1
Council response	The representation notes support for the policy overall but suggests that the two sites identified for older persons accommodation are likely to take the form of bungalows on the edge of settlements. However, the identified development principles of the sites (sites 337 and 136) are clear that these are not limited to bungalows, and whilst they are located on the edges of Brinklow and Wolston, they are considered to be within relatively close proximity to local facilities.

Issue	No justification for specifying sites to deliver serviced self-build or custom build plots
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	The representation is principally concerned with a lack of evidenced demand in relation to the requirement in part C of the policy requiring self and/or custom build homes at land at Coventry Road, Wolvey. The representation argues there is no evidenced demand in this location. Paragraph 6.20 notes evidence of continued demand for self and custom build plots across the borough. Whilst only one entrant has listed only Wolvey specifically (and another Wolvey/Brownsover) on the April 2025 version of the self and custom build register, it is also noted that multiple entrants identify 'anywhere' or 'village' or other more general location categories.

4.136. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend part C to read "residential developments shall provide serviced self-build and / or custom build plots as part of the development where there is evidence of unmet need within a specific location"	Rosconn Group
Council response to modification proposals: As mentioned in response to the related main issue above, there is evidence for need for self-build plots across the borough with many entrants on the register not specifying a preferred location. Requiring evidence of unmet need in a specific location risks under-delivery of self-build plots.	

POLICY H7 HOUSING STANDARDS

4.137. Seven representations on behalf of seven people or organisations argued that policy H7 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	The policy is unduly onerous and exceeds the requirements of emerging national policy. Developments should not be expected to exceed national standards.
Who raised the issue	Inside Land Group; Tritax Park Rugby West Limited
No. raising the issue	2
Council response	We disagree. Criterion A (Nationally Described Space Standards) is addressed below. In respect of criteria B and C, the updated Housing Needs Evidence recommends the inclusion of requirements for all dwellings to meet M4(2) standard and 3.5% of dwellings to meet M4(3) standard. Consultation on policy PM13 in the 2025 consultation version of the NPPF highlights that accessibility standards (“for which local standards in relation to requirement M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings) of the Building Regulations should be set in line with policy HO5,”) may be set locally within local plans.

Issue	No evidence provided to support inclusion of criterion A, or impact on meeting demand (e.g. starter homes). A barrier to supply.
Who raised the issue	Persimmon Homes (Central)
No. raising the issue	1
Council response	We think it is important to set minimum space standards based on the evidence. This is set out in the Nationally Described Space Standards Report (H1).

Issue	Cost implications of policy re M4(2) and M4(3) housing may serve to reduce the number of dwellings and reduce viability
Who raised the issue	Churchill Living & McCarthy Stone; West Midlands Housing Association Planning Consortium; Miller Homes (Brownsover Road); Rosconn Group
No. raising the issue	4
Council response	The costs associated with delivering this policy requirement have been included in the Local Plan Viability Study (I1). Amongst the key findings of this study (see para 1.7), is that the policy has a modest impact on viability, which is not sufficient to stop schemes from coming forward.

Issue	Not supported by evidence and mainly replicates current building regulations

Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	We disagree. As noted above, there is a clear evidence base in the updated Housing Needs Evidence for Rugby Borough (document SD3). The accessibility standards are not mandatory Building Regulation requirements, so we do not consider them duplication.

Issue	Meeting NDSS to 100% can create viability challenges including losses on 100% affordable sites
Who raised the issue	West Midlands Housing Association Planning Consortium
No. raising the issue	1
Council response	The Local Plan Viability Report (I1) includes costs associated with meeting this policy requirement, as above.

4.138. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Part B of the policy should only require 40% of new dwellings to meet the requirements for Category 2 of M4(2), in line with emerging national policy, with higher provision only "where technically and viably feasible".	Inside Land Group; Tritax Park Rugby West Limited
Policy should be more flexible so as to prevent inefficient use of sites or unnecessarily impacting viability.	Tritax Park Rugby West Limited; West Midlands Housing Association Planning Consortium; Miller Homes (Brownsover Road)
Where step-free access is not viable, neither of the optional requirements in Part M should be applied	Churchill Living & McCarthy Stone
The wording 'where viable and practicable' should be added to the end of part C 'On developments of 10 or more homes...'	Churchill Living & McCarthy Stone
85% of NDSS should be permitted for 100% affordable developments where costs require this	West Midlands Housing Association Planning Consortium
Amend wording to B to read "all new dwellings <i>should aim</i> to meet requirements"	Rosconn Group
Amend wording to C to require "up to" 3.5% of dwellings to meet requirements	Rosconn Group
Council response to modification proposals: Most proposed modifications for this policy suggest a loosening of its requirements. It is felt that introducing greater flexibility to this policy would limit its	

applicability and effectiveness and risks resulting in poorer development outcomes.

POLICY H8 HOUSES IN MULTIPLE OCCUPATION

- 4.139. One representation on behalf of one person or organisation argued that policy H8 is unsound.
Two representations on behalf of 135 people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Unfeasible for plan to be implemented given the volume of low skilled/low wage employment being proposed
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council response	We disagree. The policy is not seeking to prevent the development of HMOs, rather trying to stem concentrations of HMOs which may be considered harmful. This policy approach has been adopted in neighbouring authority areas including Coventry City.

POLICY W1 WELLBEING

- 4.140. 12 representations on behalf of 12 people or organisations argued that policy W1 is unsound.
114 representations on behalf of 1,809 people or organisations argued that the policy is sound.
The main issues for this policy are listed below.

Issue	Impacts on nearby residents from noise and traffic relating to Coventry Stadium
Who raised the issue	Lawrence, Joanna; Kaur, Sonia; Singh, Ramandeep; Kaur, Pavan; Kan, Alan; Tsim Kan, Zoe
No. raising the issue	6
Council response	Any proposals to bring the stadium back into use as a sporting venue will be required to assess impacts on nearby residents and minimise highways impacts as part of the planning application. The stadium was in use until 2016 and there have been residential properties nearby during its operational life.

Issue	Local residents' views not being given adequate consideration
Who raised the issue	Lawrence, Joanna; Kaur, Sonia
No. raising the issue	2
Council response	Local residents have been able to give their views at both this round of consultation and the previous Local Plan consultations – the council has considered responses received on

	all occasions. There will be further opportunities for residents to comment when an application is submitted.

Issue	Continued promotion of speedway activities is harmful to health of local residents
Who raised the issue	Kaur, Sonia; Singh, Ramandeep; Kaur, Pavan; Kan, Alan; Tsim Kan, Zoe
No. raising the issue	5
Council response	Any proposal to bring the stadium back into use as a sporting venue will be required to demonstrate no harmful impacts on the health of local residents.

Issue	Environmental concerns - supporting reintroduction of motor sport conflicts with BNG & climate objectives
Who raised the issue	Kan, Alan; Tsim Kan, Zoe
No. raising the issue	2
Council response	Any development proposals on the site will be required to comply with biodiversity net gain and climate policies of the plan. Further environmental assessments may also be required at application stage. The council believes the benefits of supporting the site and retaining its local cultural and recreational value justify this policy.

Issue	Site should be used for open space and community recreational uses to be more compatible with surrounding area
Who raised the issue	Kaur, Sonia; Singh, Ramandeep; Kaur, Pavan; Kan, Alan; Tsim Kan, Zoe
No. raising the issue	5
Council response	Policy W1 B supports “the restoration of the site for speedway and stock car racing and other motor sports <i>together with other community uses</i> ” [emphasis added]. It is felt this wording will facilitate the delivery of other community recreational uses as part of the site’s redevelopment. The stadium was operational until 2016, being run alongside nearby residential properties.

Issue	Inclusion of sports facilities within this policy is inconsistent with national policy -NPPF para 104. Sports facilities should not be considered suitable for development on the basis of viability or lack of commercial interest.
Who raised the issue	Sports England
No. raising	1

the issue	
Council response	In combination policy W1 and policy W2(F) means that proposals for redevelopment of sports facilities would need to satisfy <i>both</i> the provisions of policy Q1 and the applicable provisions of national policy on the protection of sport and recreation buildings and land including playing pitches. The policy is accordingly not inconsistent with national policy and doesn't allow redevelopment of sports facilities on the basis of viability or lack of commercial interest alone

Issue	Stadium should be used to provide more inclusive and future facing sport than speedway
Who raised the issue	Timms, Heather
No. raising the issue	1
Council response	Policy W1 B supports “the restoration of the site for speedway and stock car racing and other motor sports <i>together with other community uses</i> ” [emphasis added]. It is felt this wording will facilitate the delivery of other community recreational uses as part of the site's redevelopment. The plan makes provision for other kinds of sports and recreation facilities as set out in policy W2.

Issue	Viability challenges of restoring the stadium for speedways uses not considered sufficiently after 10 years of dereliction - housing should be an option
Who raised the issue	Currington, Ian; Parsons, Chris
No. raising the issue	2
Council response	Housing development is not opposed in principle by this policy – it states that permission will not be granted where proposals would conflict with the objectives of restoring the stadium for speedway and stock car racing and other community uses. Mixed-use development of the site could overcome potential viability challenges.

Issue	Policy proposes community uses for which there are no existing planning permissions granted so it is providing additional protection which is not in compliance with the NPPF
Who raised the issue	Timms, Heather
No. raising the issue	1
Council response	The respondent does not specify which national policy this is non-compliant with. The council does not consider there to be a conflict.

Issue	Inconsistent with national policy. Refers to Coventry Stadium being treated in a different

	way to other facilities but fails to set out why this is the case - the stadium has never acted as a community facility and an application to designate it as an asset of community value was rejected.
Who raised the issue	Brandon Estates Ltd
No. raising the issue	1
Council response	Community facilities are not limited to those with community ownership or designated assets of community value – it also includes privately owned businesses which provide a community service or have recreational value such as public houses and post offices. W1 B provides specific protection for Coventry Stadium on account of the site's cultural significance to the area, strong public support for its redevelopment, and previous applications and appeals on the site. The high level of support for restoration of speedway use was shown by 1,530 responses supporting this being submitted at Regulation 18 preferred options stage and a further 1,809 responses supporting this at Regulation 19.

Issue	Part B establishes separate criteria for consideration of development potential at Coventry Stadium. The NPPF does not allow for a specific facility to be treated outside of criteria-based policies. To be positively prepared, W1 should include the possibility that the site could come forward in a number of ways.
Who raised the issue	Brandon Estates Ltd
No. raising the issue	1
Council response	The policy includes a reasonable degree of flexibility – it states that permission will not be granted where proposals would conflict with the objectives of restoring the stadium for speedway and stock car racing and other community uses, rather than explicitly preventing other uses from coming forward in principle. Mixed-use development of the site with different combinations of residential and leisure uses is therefore still possible. There is no provision of the NPPF which prohibits local authorities from setting locally specific policy in this way.

4.141. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Policy W1B [re: Brandon Stadium] should also allow for repurposing for housing to counter viability challenges.	Currington, Ian
"other community uses" is too vague - further clarity on future of the site [Brandon Stadium] should be provided.	Currington, Ian
Removal from the plan of all named sports stadia and the general terms applied	Timms,

	Heather
Removal of paragraph B as there are no planning permissions granted on the site for community purposes	Timms, Heather
Amend wording to explicitly note that healthcare facilities are not covered by this policy as a community facility. Suggested additional wording "Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use."	NHS Property Services
Other sports facilities listed alongside Coventry Stadium in paragraph 7.2 should be similarly protected	Carter, David
Amend to reflect para 104 of the NPPF and the potential for the Coventry Stadium to accommodate an element of housing	Brandon Estates Ltd
Part B should be deleted and Coventry Stadium treated equally in line with national policy	Brandon Estates Ltd
Council response to modification proposals: For the reasons set out above, the council do not support the modifications proposed or consider them to be necessary to address issues of soundness. Excluding health facilities, as proposed by NHS Property Services, would conflict with NPPF para 20c) which states that community facilities can include health infrastructure.	

POLICY W2 OPEN SPACE AND SPORTS PROVISION

- 4.142. Five representations on behalf of five people or organisations argued that policy W2 is unsound. One representation on behalf of one organisation or individual argued the policy is sound. The main issues for this policy are listed below.

Issue	Insufficient green space within the town centre. Suggestion of CPO to create new open space on land adjacent to Chapel Street.
Who raised the issue	Batchelor, Colin
No. raising the issue	1
Council response	The town centre boundary lays within the wards of Benn, Eastlands and New Bilton. Per the existing provision table on pages 88-89 of the submitted Local Plan, it is recognised that both Benn and New Bilton have deficits across all open space typologies when measured against the open space standards specified by policy W2, and that Eastlands has deficits across three of the typologies. Therefore, any residential developments of 10 or more dwellings within these wards will be expected to deliver open space in line with the standards, either through on-site provision or off-site contributions. The acknowledged deficiencies in open space within the town centre (or elsewhere in the Borough) are not deemed to make policy W2 unsound, and the compulsory purchase of land is not considered to be a matter of direct relevance to the assessment of this policy at examination.

Issue	W2(f) cross refers to policy W1. Not clear how proposals on open space, sports and recreation areas will be assessed, and considered inconsistent with NPPF para 104.
Who raised the issue	Sports England; Urban & Civic
No. raising the issue	2
Council response	There is no inconsistency. In combination policy W1 and policy W2(F) means that proposals for redevelopment of sports facilities would need to satisfy <i>both</i> the provisions of policy Q1 and the applicable provisions of national policy on the protection of sport and recreation buildings and land including playing pitches. The policy is accordingly not inconsistent with national policy paragraph 104, indeed it directly applies it.

Issue	Playing pitch requirements are based on team numbers. Team numbers should be regularly reviewed - ideally annually (relevant to appendix 3), and ancillary requirements should also be considered.
Who raised the issue	Sports England
No. raising the issue	1
Council response	It is not feasible to update the open space standards on a rolling basis. It needs to be clear from the plan what the expectation is. These standards can only be updated through plan-making.

Issue	Unclear whether standards used for new provision or financial contributions in W2B. W2E should be expanded so that strategy informs on or off site provision.
Who raised the issue	Sports England
No. raising the issue	1
Council response	The standards will be used, in combination with the Playing Pitch & Outdoor Sports Strategy as specified in W2.E, to determine when on-site provision or off-site contributions are necessary, with clear preference given to the former. New residential developments can only be expected to address the impacts that they are causing, not pre-existing issues, such as whether an existing pitch is overplayed. However, as the policy specifies that the need for contributions to sport pitch provision will be assessed based on the Playing Pitch & Outdoor Sport Strategy, this will allow, where appropriate, improvements to the quality of existing

	pitches to be secured through developer contributions.

Issue	Plan does not address shortfalls in quality indoor sports provision in Rugby - only outdoor sports provision is explicitly mentioned. Population growth will create even further demand.
Who raised the issue	Rugby and District Badminton Association
No. raising the issue	1
Council response	The policy does not cover indoor sport provision. The policy is first and foremost about land use planning i.e. reserving land for the provision of open space and outdoor sports. It does not cover public buildings for indoor sport. This is commonly the position in similar local plan policies. Policies W1 and W2 do, however, protect existing indoor sports facilities. The cost and complexity of delivering new public indoor sports facilities mean that it is seldom realistic to deliver such facilities through housing development and the scale of new housing developments proposed through the plan could not deliver such facilities. Contributions to such borough-wide facilities would likely fall outside of the reasonable scope of site-specific s106 contributions. The provision of indoor sports facilities is more a matter for infrastructure planning. This infrastructure is not needed to mitigate individual developments planned through this plan, and so is not essential infrastructure to deliver the plan. However, the council has commissioned an indoor sports facilities study which is underway but not yet completed. Although important to planning for future indoor sports facilities in the borough, this study is not essential evidence to justify a policy of the proposed submission plan. Once the indoor sports facilities study is completed, any infrastructure requirements it identifies can be added to the infrastructure deliver schedule (which is a live document) and/or to the council's CIL annual infrastructure funding statements.

Issue	Identified existing open spaces at Houlton in the policies map do not align with what has been constructed.
Who raised the issue	Urban & Civic
No. raising the issue	1
Council response	Some of the areas identified as open space by the consultee did not meet the definition of open space as adopted by the Council and therefore have not been identified as such on the policies map. For example, the area to the north of Houlton Way which contains a series of ponds was not publicly accessible at the time that the open space study was conducted, with signs erected on fences stating "No pedestrian access".

Issue	At present, policies W1 and W2 read as interchangeable, which is inconsistent with national guidance. W2 is the correct place against which NPPF para 104 should be applied.
Who raised the issue	Brandon Estates Ltd
No. raising the issue	1
Council response	It is not agreed that policies W1 and W2 read as interchangeable. W2 sets out the open space standards that new residential developments of 10 or more dwellings shall meet, whereas W1 protects against the loss of existing community facilities, including indoor and outdoor sports facilities as specified in paragraph 7.1. The Council deem that there is a distinct need for both policies and that they are consistent with the NPPF.

Issue	Plan fails to address the deficit in existing open spaces and the impact on existing spaces new developments will have.
Who raised the issue	O'Connell, Mark
No. raising the issue	1
Council response	Deficiencies in the quantitative provision of open space when measured against the standards set out by policy W2 are acknowledged in Appendix 3 of the submitted local plan. Qualitative deficits are identified in the Open Space Quality Audit Report (WB4). Addressing these deficiencies will require actions that are beyond the scope of a land-use plan, such as maintenance works or proposals for upgrading or enhancing facilities. However, the local plan does seek to ensure that sufficient open space shall be provided for planned growth by requiring new residential developments of 10 or more dwellings to provide open space on-site or make contributions to off-site provision, as set out in policy W2.

4.143. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend policies map showing open spaces in Houlton to reflect actual constructed facilities and use real place names	Urban & Civic
Amend part A to read "should aim"	Rosconn Group
New facilities in new developments must allow equal access and priority to existing residents in neighbouring areas. This must include a responsibility for those sites to remove existing deficits. Where there is a surplus, they could also benefit from not having to make further provisions and therefore increasing the surplus. Alternatively,	O'Connell, Mark

new developments must support their neighbours by funding projects to remove such deficits.	
Spaces, such as Great Central Way, must be protected during development and once the development is complete. Urbanisation of green spaces must not be permitted and natural barriers to any buildings must be created.	O'Connell, Mark
Provide explicit clarity that the pitch standards will be reviewed regularly in line with updated team and membership numbers, to ensure that demand assessments remain accurate and up to date.	Sport England
Confirm that Policy W2B is not applicable to the playing pitch standards, reflecting the fact that the PPS is not structured around ward boundaries and therefore should not be applied as a criterion for playing pitch typologies.	Sport England
Expand the wording of Policy W2E to state that decisions regarding on-site provision or off-site financial contributions will be informed by the Playing Pitch & Outdoor Sport Strategy.	Sport England
Amend the policy and Appendix 3 to include clear requirements for ancillary sports provision—such as car parking and changing accommodation—to ensure that playing field sites are fully supported and functional.	Sport England
Council response to modification proposals: The response to the council to most of these proposed modifications is set out in responses to individual issues above. In relation to the second Sport England proposed modification, it is not necessary to modify the policy to say this, because W2B it is already inapplicable to sports pitches as ward level data has not been collected for these and is not presented in Appendix 3. The third Sport England proposed modification is not considered necessary to address an issue of soundness. The fourth Sport England proposal is a detailed design point about the delivery of new sports facilities. This can be considered if/when new facilities come forward. Given the cumulative scale of s106 contributions already being sought through the plan, the council does not consider that contributions to off-site sport provision can viably be increased further.	

POLICY D1 WELL-DESIGNED PLACES

4.144. 70 representations on behalf of 74 people or organisations argued that policy D1 is unsound. three representations on behalf of three people or organisations argued that the policy is sound.

4.145. Most of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy D1 itself and so this hasn't been identified as a main issue.

4.146. The following main issues were raised with policy D1:

Issue	Repeats national policy
Who raised	William Davis Homes (site 315)

the issue	
No. raising the issue	1
Council response	The purpose of this policy is to set out high-level design principles for all development across the borough. It is appropriate that this covers the same themes as national policy, however we do not agree that it repeats national policy.

Issue	D1 is unsound because it makes reference to local design codes, one of which is the South West Rugby Design Code, which is considered to be overly prescriptive.
Who raised the issue	Tritax Big Box Developments Ltd (Site 17)
No. raising the issue	1
Council response	The policy itself does not make reference to design codes, but the supporting text (para 8.1) sets out that the policy will be supported by design codes. This is in line with national guidance. The South West Rugby Design Code Supplementary Planning Document (SPD) was adopted by the Council in July 2025 and is a material consideration in determining planning applications on the South West Rugby allocation. We disagree that reference to design codes makes this policy unsound.

4.147. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Delete the reference to local design codes.	Tritax Big Box
Council response to modification proposals: Response is set out above.	

POLICY D2 INFILL AND HOUSEHOLDER DEVELOPMENT

4.148. 67 representations on behalf of 71 people or organisations argued the policy was unsound and one stated it was sound.

4.149. All of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy D2 itself.

4.150. No main issues were raised with policy D2.

POLICY D3 LANDSCAPING

4.151. 70 representations on behalf of 74 people or organisations argued that policy D3 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound.

4.152. Most of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy D3 itself and so this hasn't been identified as a main issue.

4.153. The following main issues were raised with policy D3:

Issue	D3 is too restrictive and makes insufficient allowance for operationally essential infrastructure.
Who raised the issue	Everwell Development and Mactaggart Family & Partners
No. raising the issue	1
Council response	We disagree that this policy is restrictive. It seeks to ensure development proposals are 'landscape led'.

Issue	Repeats national policy
Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	There is a clear relationship with the nature characteristic in the National Design Guide as acknowledged within para 8.5 of the supporting text. However, we do not agree that this policy repeats national policy.

4.154. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Criteria A, C, D, E, F, G, and H should be caveated with "where possible" or "where applicable", and criterion I should confirm that it will not be applied to the detriment of the function and requirements of use.	Everwell Development and Mactaggart Family & Partners
Review wording to clarify overall purpose of the requirements and ensure consistency with EN2.	Miller Homes (Brownsover Road)
Reword part E to separate out hard and soft landscaping requirements.	Miller Homes (Brownsover Road)
Council response to modification proposals: The council does not agree that it is necessary to add "where possible" and "where applicable" to every policy requirement. According to this logic every policy of the plan would need to be caveated in	

that way. This is not necessary because it obvious that policies aren't applied where they are inapplicable of compliance is impossible.

There is no inconsistency with Policy EN2 which is a thematically distinct policy.

The suggested amendment to para E is not considered necessary to address an issue of soundness. It is clear that "robust materials" applies to hard landscaping and "native planting" applies to soft landscaping without expressly setting this out.

POLICY D4 HISTORIC ENVIRONMENT

4.155. 70 representations on behalf of 75 people or organisations argued that policy D4 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound.

4.156. Most of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy D4 itself and so this hasn't been identified as a main issue.

4.157. The following main issues were raised with policy D4.

Issue	Repeats national policy.
Who raised the issue	William Davis Homes (site 315)
No. raising the issue	1
Council response	The policy states that it gives effect to national policy and legislation on the historic environment (para 8.9). It seeks to ensure the proper assessment and understanding of the significance of a heritage asset and the contribution of its setting. It does not repeat national policy in any significant way.

Issue	Does not fully capture the issue of incremental erosion of the setting of heritage assets.
Who raised the issue	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
No. raising the issue	2
Council response	Policy D4 is intended to be applied in the determination of planning applications which may impact a heritage asset and its setting. This has to be considered on a case-by-case basis.

4.158. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Replace para C with "Applications with the potential to affect the significance of a heritage asset, including the contribution made by its setting, must provide sufficient information and assessment (such as desk-based appraisals, field evaluation, and heritage impact assessments) to allow the nature, extent, and significance of any potential heritage assets and their setting to be understood and to enable a sufficient level of understanding of the proposal's likely impacts."	Warwickshire County Council
Add new para D: "There will be a presumption in favour of the preservation of locally and regionally important archaeological sites. Development that would result in harm to archaeological remains will only be supported where the applicant can demonstrate that the public benefits of the proposal clearly outweigh that harm. Where planning permission is granted for development that will have an adverse effect on archaeological remains, the Council will require the applicant to secure a programme of recording and analysis of that asset and archaeological excavation where relevant and ensure the publication of that record to an appropriate standard."	Warwickshire County Council
Amend para C to require consideration for the cumulative impacts of existing and proposed development when assessing impact.	Dunchurch Parish Council, Thurlaston Parish Council and Action4Dunchurch
The approach to support 'development that sustains and enhances the significance of heritage assets and their settings' should be considered on an overall basis having regard to the aims of other policies and the need to facilitate new development	Miller Homes (Brownsover Road)
Council response to modification proposals: We are unclear what the first proposed amendment from Warwickshire County Council adds. This seems like a longer-form way of saying the same thing. The council has striven for clarity and conciseness in the expression of policies. It is not clear what issue of soundness this change would be seeking to address. The council disagrees with proposed new paragraph D from Warwickshire County Council. National policy and legislation provides a clear and comprehensive framework for the assessment of the impact of proposals on heritage assets including archaeology. Introducing separate local tests for just archaeological remains risks creating incoherence, making it difficult for decision makers to know how to respond to a proposal, and introducing conflict with national policy (particularly as national development management policies are introduced). It is not clear what issue of soundness this modification is seeking to address.	

POLICY D5 SUSTAINABLE DRAINAGE

4.159. 73 representations on behalf of 77 people or organisations argued that policy D5 is unsound. Two representations on behalf of two people or organisations argued that the policy is sound.

4.160. Most of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness

issues with Policy D5 itself and so this hasn't been identified as a main issue.

4.161. The following main issues were raised with policy D5.

Issue	Policy does not appear to address the current flood areas within villages & how water drainage in an existing flood area could be effectively managed without polluting existing waterways & worsening any flood risk
Who raised the issue	Wykes, Michael; Wykes, Janet
No. raising the issue	2
Council response	This policy is designed to manage surface water through use of sustainable drainage. Part D discusses a scenario where infiltration sustainable urban drainage systems (SuDs) (preferred) are not possible and surface water is discharged into a watercourse with the agreement of the Lead Flood Authority. Policy EN7 addresses flood risk, and a sequential approach has been taken in the site selection process for proposed allocations.

Issue	Policy does not take into account the pressure that would be placed on an already struggling wastewater system
Who raised the issue	Wykes, Michael; Wykes, Janet
No. raising the issue	2
Council response	This policy is designed to manage surface water through use of sustainable drainage. The policy states a preference for infiltration SuDs – i.e. where surface water soaks into the ground. Wastewater management is not relevant to this policy.

4.162. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend to add flexibility in part B to take into account specific site circumstances	Miller Homes (Brownsover Road)
Amend part B to read "SuDS should aim to"	Rosconn Group
Amend part E to read "SuDS should aim to have a maintenance..."	Rosconn Group
Council response to modification proposals: The council does not consider that the proposals for weakening of the policy wording are necessary to address an issue of soundness and these are not supported.	

POLICY I1 TRANSPORT

- 4.163. 66 representations on behalf of 71 people or organisations argued that policy I1 is unsound. Four representation on behalf of four people or organisations argued that the policy is sound. The main issues for this policy are listed below. Two representations were recorded as supporting the policy.
- 4.164. A significant proportion of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy I1 itself and so this hasn't been identified as a main issue.
- 4.165. The following main issues were identified:

Issue	Horse riding should be included in I1 B.vi to avoid dead end routes, and should be consistently included in the definition of active travel routes to avoid riders being designed out
Who raised the issue	British Horse Society
No. raising the issue	1
Council response	Supporting text 9.1 makes reference to horse riding as a part of active travel. The policy text refers to the most common means of accessing local facilities (walking, wheeling and cycling), whereas horse riding is considered primarily a recreational means of travel. Where a bridleway crosses an allocation site this must be retained in the development layout to ensure continued use of existing routes by horse riders.

Issue	RBC has no influence on the bodies responsible for public transport and therefore cannot ensure this is delivered
Who raised the issue	Pailton Parish Council
No. raising the issue	1
Council response	Bus services are overseen by Warwickshire County Council with improvements set out in the Bus Service Improvement Plan (BSIP) (see https://api.warwickshire.gov.uk/documents/WCCC-222510381-336). The Council has worked closely with Warwickshire County Council in the development of the local plan. Developers may be required to contribute to the delivery of BSIP schemes, as set out in the Infrastructure Delivery Schedule (I2).

Issue	Policy should be expanded to refer to ultra-low and zero emission vehicles and car sharing as sustainable transport modes per NPPF
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
No. raising	4

the issue	
Council response	The policy is designed to promote active travel and public transport use, and reduce vehicular traffic. Although ultra-low and zero emissions vehicles, and care sharing are more sustainable than conventional motorcar travel, they do not deliver all the benefits of active travel and public transport use which the policy seeks to deliver.

Issue	Local Cycling and Walking Infrastructure Plan is not sufficiently robust and requires a review to help improve connectivity between different localities in Rugby and secure funding for resurfacing schemes on GCW and the canal paths to open up access routes
Who raised the issue	Dixon, Chris
No. raising the issue	1
Council response	The Local Cycling and Walking Infrastructure Plan (LCWIP) was produced and adopted by Warwickshire County Council in 2024. The local plan is seeking to support proposals and schemes identified in the LCWIP, as referenced in the development annex, and in the Infrastructure Delivery Schedule (I2). Any update to the LCWIP would be a matter for Warwickshire County Council.

Issue	Insufficient infrastructure is proposed to accommodate the scale of growth around Rugby town. Road congestion is already a significant issue.
Who raised the issue	Callan, Neil
No. raising the issue	1
Council response	This comment relates more closely to proposed allocations around Rugby in policies S6 and S7. Specific comments on individual sites in relation to transport and infrastructure have been responded to under S6 and S7 in this document. The plan has been developed in consultation with infrastructure providers including Warwickshire County Council, the local highway authority. The Strategic Transport Assessment (I3) modelled the potential impacts of the development proposals and identified highways improvements schemes to mitigate any adverse impacts. These are set out in the Infrastructure Delivery Schedule (I2) and developers of some schemes will be required to contribute to their funding. The plan cannot address existing infrastructure issues such as existing congestion.

4.166. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)

Provision for active travel should include upgrades to wider routes through the rest of Rugby not just new sites such as SW Rugby to create complete connections	Robson, John
Part A should refer the Warwickshire Bus Service Improvement Plan (BSIP) and Warwickshire Rail Strategy (or their successors)	Warwickshire County Council
Refer to the provision of home to school transport and the prioritisation of safe walking routes where this could reduce the need for home to school transport	Warwickshire County Council
Amend policy to allow for flexibility to respond to site specific circumstances	Miller Homes (Brownsover Road)
Amend part B to read "development should aim"	Rosconn Group
Add the following to I1 Bi. "...and opportunities for sustainable transport modes, including walking and cycling, ultra-low and zero emissions vehicles, car sharing and public transport, can be maximised"	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes
Council response to modification proposals: The first comment relates to the need for upgrades to existing active travel infrastructure unrelated to new development. This is a matter for the transport plans of Warwickshire County Council. This policy is only applicable to planning applications for new development. In relation to the first WCC proposal, this amendment is not considered necessary to address an issue of soundness. The need for contributions to BSIP measures is identified in the Strategic Transport Assessment and the need for public transport contributions is referenced in a number of the site allocation development principles. It is not clear that development could/should contribute to the delivery of the Rail Strategy. Notwithstanding the council's view that this is not necessary to address an issue of soundness, it would not object to this modification being made if the inspector(s) conclude otherwise. The council's response to the proposal of the county council in relation to home to school transport is the same: this is not needed to address an issue of soundness, but the council would not oppose this amendment. The amendments seeking to weaken the policy are not supported. The council's response to proposal of GLP Europe et al. is set out above.	

POLICY I2 PARKING

- 4.167. Two representations on behalf of two people or organisations argued that policy I2 is unsound. One representation on behalf of one person or organisation argued that the policy is sound. The following main issues were raised with policy I2:

Issue	Para 9.4 - reducing parking provision doesn't reduce car ownership and contributes to on-street parking pressures
Who raised the issue	Warwickshire County Council
No. raising the issue	1

Council response	Supporting text 9.4 does not restrict parking provision – it is designed to acknowledge the need for balance and that overprovision of parking can reduce modal shift potential and can be an inefficient use of land.

Issue	para 9.6 - Further clarification is required on where car clubs have been successfully secured and operated. WCC are not aware of any examples in Warwickshire. Evidence of where they have been implemented elsewhere, how successful they have been, and how they are managed in perpetuity would assist in understanding their applicability
Who raised the issue	Warwickshire County Council
No. raising the issue	1
Council response	Supporting text 9.6 does not actively promote the use of car clubs nor draw on evidence of their successful implementation. It instead seeks to provide flexibility within parking standards where site-specific circumstances may justify more or less parking provision than is set out in the standards.

Issue	Requirements for cycle parking in elderly persons/extra care accommodation are unnecessary as the types of people who live there are unlikely to cycle
Who raised the issue	Churchill Living & McCarthy Stone
No. raising the issue	1
Council response	Cycle parking provision is still felt to be justified for these developments to promote sustainable and active travel for staff and/or visitors.

4.168. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
App 2 use "cycle spaces" rather than "cycle stands"	Warwickshire County Council
Standards for cycle parking should reflect LTN 1/20 there are currently some discrepancies	Warwickshire County Council
Appendix B should state that cycle parking for adapted cycles for disabled people should be provided for all land uses and should equate to 5% of total cycle parking capacity both long and short stay and should be co-located with disabled car parking	Warwickshire County Council
The basis for determining the boundary of the High Access Zone is unclear, however	Warwickshire

it is noted that some trips within the zone, particularly to the railway station, significantly exceed the typical 1-mile / 20-minute walking threshold which is commonly used to define reasonable walking access, and do not offer direct bus services. It may therefore be more appropriate to consider parking requirements within the zone on a case-by-case basis rather than accepting lower provision as standard	County Council
Refer to "mobility / visual impairments" instead of "disabled" or "persons with disabilities"	Warwickshire County Council
Additional text needed on access to cycle parking: Is the facility accessed from a 20mph street? Is it served directly by a dedicated cycle route? Is it positioned on the appropriate side of the carriageway for safety and legibility?	Warwickshire County Council
Detailed comments and modifications suggested see page 122 onwards of WCC response	Warwickshire County Council
Delete the requirement for provision of residents' cycle parking for elderly persons' dwellings so that each case can be considered on its own merits. Parking requirements should also be considered based on the data of the main providers and each case judged on its own merits.	Churchill Living & McCarthy Stone
Parking spaces for HMOs should be the same in both high and low access areas - one space per bedroom	Save Rounds Gardens (New Bilton Community Association)
Garages should not be taken into account in the parking allocation. Where possible garages should be discouraged and smaller storage facilities encouraged, giving more space for parking.	O'Connell, Mark
Underground parking should be considered.	O'Connell, Mark
The allocation for any property, irrespective of bedrooms, should have a provision for 2 cars to be parked.	O'Connell, Mark
Council response to modification proposals: Suggested amendments to references to cycle spaces and visual/physical impairments do not affect matters of soundness. 'Cycle spaces' are referred to already throughout appendix 2, and the only reference to stand (which could be corrected for consistency) is on page 77. The council will propose this correction as an additional modification. Standards for provision of adapted cycle parking have not been included, and have not been suggested through previous public consultations. Cycle parking standards were amended following the Preferred Options consultation (Regulation 18) to more closely align with LTN/120 based on feedback received at that stage. However, LTN/120 (p134) does not identify standards for all of the uses defined in appendix 2. Access to cycle parking is beyond the scope of what the standards are seeking to achieve – i.e. provision of an appropriate amount of parking. Existing national and Local Highway Authority guidance can inform access.	

Detailed suggestions in the Warwickshire Country Council representation are largely addressed in this Council response, though it may not address every point specifically.

The high access zone is a modified version of the high access zone in the adopted local plan, and focusses on access to Rugby town centre primarily. This updated version of the high access zone has been designed to ensure it reflects walking/cycling routes from the defined town centre, and seeks to redraw the area rationally, avoiding for example streets being half in the zone and half out. Vehicle parking standards are intended for flexible application where evidence supports this, as set out on page 75.

Cycle parking provision for dwellings for elderly persons aligns with LTN/120, and was amended to the current proposal following feedback at Regulation 18 (Preferred Options).

Vehicle parking provision for HMOs seeks to respond to a high access context in a similar way to other residential uses. These can be applied flexibly as set out on page 75.

As set out in the 'notes' column for residential parking standards (79), garages may only be included in parking space provision where minimum internal dimensions are provided. This is designed to ensure that the garage could appropriately accommodate a parked car and other storage, and aligns with the Warwickshire Design Guide produced by the Local Highway Authority.

The parking standards do not prohibit underground parking, though this is not a common form of parking provision within the borough.

Parking standards for vehicles may be applied flexibly based on the evidence. It is not considered necessary to provide a minimum of two parking spaces per dwelling.

POLICY I3 COMMUNICATIONS INFRASTRUCTURE

4.169. No representations were received on this policy.

POLICY I4 INFRASTRUCTURE AND PLANNING OBLIGATIONS

4.170. 89 representations on behalf of 92 people argued that policy I4 is unsound, however most of these relate to the inconsistency of residential allocations with the policy rather than the policy itself. Three representations on behalf of three people or organisations argued that the policy is sound.

4.171. A significant proportion of those making representations argued that the policy was unsound because proposed site allocations in Wolvey would not accord with it. These representations do not raise soundness issues with Policy I4 itself and so this hasn't been identified as a main issue.

4.172. The following main issues were raised with policy I4:

Issue	Plan should mention need for a new household recycling centre and waste transfer station

Who raised the issue	Warwickshire County Council
No. raising the issue	1
Council response	This is outside of the scope of the local plan as a county matter, and a matter for waste planning. However, the council has indicated in its statement of common ground with Warwickshire County Council (document SOCG7). This is included in the proposed minor modifications (document CD20).

Issue	Criterion B is unsound in seeking retrospective contributions and has the potential to delay the pace of decisions
Who raised the issue	Persimmon Homes (Central)
No. raising the issue	1
Council response	The experience of the council is that this policy would address a genuine issue of latecomer sites piggybacking on infrastructure already delivered without contributing. This is principally a risk that arises in relation to speculative development that isn't in the plan. It is expected that this would apply to relatively few developments and would not delay decisions.

Issue	Policy is too rigid and does not allow for different site contexts
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	The principle that sites should mitigate their impacts to avoid unacceptable impacts is not "too rigid" but a basic principle that should apply irrespective of site context.

4.173. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Policy should state that responsibility for employment and skills plan is responsibility of future occupier of the building rather than the developer	Barberry Ansty Limited
The IFS should reference electricity infrastructure requirements, and specify that LPA should maintain regular contact with NGED to ensure an up-to-date schedule of requirements is maintained.	National Grid Electricity Distribution

Add wording to ensure planning obligations sought meet the tests in NPPF (2024) para 58	Miller Homes (Brownsover Road)
Council response to modification proposals: Who signs the employment and skills plan would be a matter for determination on an application by application basis. It is not necessary to modify the plan to set this out. The comment of NGED is considered to be more about the implementation of the plan than a comment on the soundness of this policy. However, the council agrees it is important to maintain regular dialogue and share up to date information on requirements. It is not necessary to repeat the rest for planning obligations set out in national policy, indeed doing so would be contrary to the NPPF text on duplicating national policy.	

POLICY I5 NEW RAILWAY STATIONS

4.174. Three representations on behalf of 300 people or organisations argued that policy I5 is unsound. Three representations on behalf of three people or organisations argued that the policy is sound. The main issues for this policy are listed below.

Issue	Safeguarding land for potential mainline connection is not justified and not shown to be deliverable
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	The Rugby Parkway Station - Safeguarding Land for Future Expansion report (I12) puts forward the case for safeguarding land for this purpose. The expansion of the railway station would enhance the public transport offering at Houlton SUE and eastern Rugby, in line with national policy (NPPF section 9 Promoting sustainable transport).

Issue	Expansion of the station would lead to exacerbation of local traffic issues which have not been sufficiently evidenced or mitigated
Who raised the issue	Hillmorton Voice Residents Association
No. raising the issue	298
Council response	This policy seeks to safeguard land for the potential expansion of the proposed Rugby Parkway railway station rather than setting out a concrete development scheme. Any development proposal will be subject to further highways assessments and mitigation schemes may be required.

Issue	Contravenes protection for the Rainsbrook Valley in policy EN3

Who raised the issue	Hillmorton Voice Residents Association; Warwickshire Wildlife Trust
No. raising the issue	299
Council response	It is true that the safeguarded land lies within the area designated as the Rainsbrook Valley landscape of elevated sensitivity in policy EN3. Policy I5 seeks to safeguard land for the potential expansion of the proposed Rugby Parkway railway station rather than setting out a concrete development scheme. Any development proposal will be subject to further landscape assessments and mitigation measures to minimise harms to the Rainsbrook Valley landscape of elevated sensitivity may be required.

Issue	The Nuneaton Parkway safeguarded land should be deleted - no case for it.
Who raised the issue	CPRE
No. raising the issue	1
Council response	The Nuneaton Parkway Safeguarding document (I13) sets out the case for a new railway station at this location. The station would provide sustainable transport options for rural settlements to the north of Borough and reduce vehicular traffic into Nuneaton and Hinckley. This policy seeks to safeguard land for the potential development of Nuneaton Parkway station; it is not a concrete development scheme. Further business case evaluation is still ongoing.

Issue	Settlement hierarchy does not appear to reflect this policy and neglects opportunities at Rugby, notably Hillmorton
Who raised the issue	Persimmon Homes (Central)
No. raising the issue	1
Council response	It is assumed this comment relates primarily to land safeguarded for potential expansion of Rugby Parkway station. The safeguarded land is close to Houlton SUE which will deliver c.6000 homes and offers significant ridership opportunities for the new station. It will also provide connectivity to areas such as Hillmorton and rural settlements in West Northamptonshire. The settlement hierarchy still prioritises development within the Rugby urban area, where it is appropriate to do so. The site selection process considered a range of factors, and proximity to the potential expansion area of the railway station would not necessarily override other concerns e.g. landscape sensitivity of the Rainsbrook Valley at Hillmorton.

Issue	Request that potential wider benefits of the Rugby Parkway Station are recognised beyond

	Rugby Borough and that efforts are made to improve connectivity with villages in West Northamptonshire.
Who raised the issue	West Northamptonshire Council
No. raising the issue	1
Council response	Noted. The Council welcomes the opportunity to work with West Northamptonshire Council in ensuring the station delivers benefits across the wider area.

4.175. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Amend para 9.17 to reflect the fact that Rugby Parkway station has been granted outline planning permission.	Stoford Properties Ltd
Council response to modification proposals: This is a proposed factual amendment to supporting text. It isn't necessary to address an issue of soundness but could be made as an additional modification.	

OTHER ISSUES: DUTY TO COOPERATE

4.176. The following main duty to cooperate issues were raised in addition to those noted under specific policies above.

Issue	No reference to potential for Coventry to meet housing requirements given RBC had previously accommodated some of Coventry's unmet need
Who raised the issue	Bostock, Tom
No. raising the issue	1
Council response	Coventry City is a tightly bounded urban authority. It is not a realistic option for it to accommodate unmet need from Rugby Borough.

Issue	No response from Harborough Council or engagement as to whether Coton Park East allocation could be accommodated at Magna Park
Who raised the issue	Currington, Ian
No. raising the issue	1

Council response	Exporting employment need to Harborough District is not considered to be a realistic option. Harborough District lies within a different functional economic market area and housing market area.

Issue	Insufficient evidence of ongoing constructive engagement with neighbouring authorities and relevant bodies
Who raised the issue	Pitty, Kathleena; Pitty, Richard; Jennings, Ross; Longworth, Tom
No. raising the issue	4
Council response	The Duty to Cooperate Statement (document CD14) details the engagement undertaken. Subsequent to the consultation closing, statements of common ground have been prepared (documents SOCG1-17).

Issue	There has been no collaborative work to determine whether Green Belt release on the Coventry/Rugby boundary constitutes an appropriate strategy for meeting strategic employment needs contra NPPF para 24
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The statement of common ground with Coventry City Council (SOCG2) states in relation to the sites close to the Coventry urban edge (Ansty Park North and Walsgrave Hill): “It is further agreed that these sites are potentially appropriate locations to accommodate opportunity Area 7 strategic need and local employment need given their proximity to existing employment clusters, their existing and potential transport links, and their proximity to labour supply in Coventry. It is agreed that these benefits contribute to sustainably located employment provision as part of a balanced spatial strategy which addresses both local and sub regional need.”. Stoford’s comment appears to imply that there should be a joint local plan between Coventry and Rugby and/or a joint Green Belt study. In relation to the former suggestion, the preparation of joint plans is not a requirement of the NPPF. In relation to the latter point, the West Midlands Green Belt boundary and the administrative boundary between Rugby Borough and Coventry are the same except for a small area of Green Belt within Coventry City north of the M6 and lying between Alderman’s Green Lane and Shilton Lane south east of Alderman’s Green village which is very unlikely to be a realistic development location. Therefore, a Green Belt review in this area is effectively only considering Green Belt within Rugby Borough and it is appropriate that it was commissioned by Rugby Borough Council. Coventry City Council were consulted on the methodology for the Green Belt review.

Issue	RBC has not engaged with South Warwickshire University NHS Foundation Trust / University Hospital Coventry and Warwickshire NHS Trust regarding absorbing increased demand for healthcare
Who raised the issue	South Warwickshire University NHS Foundation Trust; University Hospital Coventry and Warwickshire NHS Trust
No. raising the issue	2
Council response	Neither of the above organisations was a prescribed body listed in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012 for the purposes of the duty to cooperate under s33A Planning and Compulsory Purchase Act 2004, prior to the repeal of this provision. The relevant prescribed body listed is each integrated care board (ICB) established under Chapter A3 of the National Health Service Act 2006 and NHS England. The ICB for Rugby Borough is Coventry and Warwickshire ICB. A statement of common ground with Coventry and Warwickshire ICB is document SOCG14. Notwithstanding that neither organisation is a prescribed body, they are relevant bodies for the purposes of the NPPF. NPPF paragraph 25 refers to engaging with “relevant bodies” which includes “infrastructure providers” which paragraph 26 states “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary”. Paragraph 27 states that “strategic policy making authorities should make sure that their plan policies align as fully as possible with those of other bodies where a strategic relationship exists on these matters, and take into account the relevant investment plans of infrastructure providers, unless there is a clear justification to the contrary. In particular their plans should ensure that: a) a consistent approach is taken to planning the delivery of major infrastructure, such (...) strategic health, education and other social infrastructure (such as hospitals...)”. The requirements of these paragraphs are to as part of joint-working with relevant bodies “align as fully as possible”, “take into account the relevant investment plans of infrastructure provides” and ensure “a consistent approach is taken to the delivery of major infrastructure”. As detailed in the Duty to Cooperate Statement (CD14) the Development Strategy Manager of the council has engaged with University Hospital Coventry and Warwickshire NHS Trust (UHCW) and South Warwickshire University NHS Foundation Trust (SWFT) through regular meetings of the NHS Local Estates Forum (LEF) which UHCW generally chairs. The Development Strategy Manager attended meetings of the LEF on 23 July 2024, 30

September 2024, 22 December 2024, 3 February 2025, 7 April 2025, 2 June 2025 and since the preparation of that statement further meetings on 6 October 2025, 1 December 2025, and 2 February 2026.

At those meetings from summer 2024 onwards the Development Strategy Manager presented the evidence base on future housing needs and population growth, presented the emerging preferred options, and more recently presented the proposed submission plan. By providing this information as plan-making was progressing the council sought to enable the NHS organisations to understand planned housing and population growth and factor that into their plans. Conversely, the meetings allow the council to understand the plans of the NHS organisations. The LEF meeting on 6 October 2025 was an in-person workshop hosted by and led by RBC on the emerging proposed submission plan.

At those meetings RBC highlighted the consultation periods and encouraged responses from the NHS organisations present.

UHCW is on the council's planning policy consultation database and was invited to respond to both Regulation 18 consultations. It did not respond at issues and options stage and responded at preferred options stage only to set out its support for the allocation of land at Walsgrave Hill, Rugby site (site 121) because of the ability of that site to deliver a blue light route to the hospital.

SWFT was not, prior to the Regulation 19 consultation, on the council's planning policy consultation database because it does not operate hospitals in the borough or which primarily serve the borough. However, it engages with the council through the Rugby LEF as detailed above.

Overall, RBC has clearly engaged with UHCW and SWFT and other NHS organisations operating in the borough to ensure that their respective planning aligns as fully as possible and to ensure that the council can, "take into account the relevant investment plans of infrastructure providers".

Turning to the substance of the two organisations' complaints:

- SWFT states in its response that there are an increasing number of Rugby Borough residents accessing Warwick Hospital and it seeks financial contributions to healthcare infrastructure to mitigate these impacts.
- UHCW submits a similar response arguing that financial contributions are needed to increase capacity at the trust's hospitals which serve Rugby Borough residents.

In response, the council would make the following points:

- The requirements of the NPPF do not include an assumption that local plans will fund increased capacity at secondary healthcare facilities through developer contributions as sought by SWFT and UHCW. Generally the position is that hospitals are not funded through the planning system.
- Given that UHCW and SWFT serve sub-regional catchments encompassing all of

	Coventry and Warwickshire it is generally difficult to demonstrate that contributions sought through s106 – as is proposed by both SWFT and UHCW – are directly related to the development and fairly related in scale and kind for the purposes of Regulation 122 of the Community Infrastructure Levy Regulations 2010. This is particularly the case because Coventry and Warwickshire as a housing market area is circa 70% self-contained in terms of migration. Moves from one part of the areas the hospitals serve to another do not create a need for additional hospital infrastructure. It is also the case that s106 contributions would be difficult to justify because all new housing allocations proposed through the plan are relatively small-scale with the largest new allocation for 400 homes. - Similarly, it may be difficult to demonstrate that such contributions are necessary given the availability of other funding sources to pay for hospitals. - Rugby Borough Council is a community infrastructure levy charging authority and this can in principle be used to fund strategic infrastructure including healthcare. However, decisions as to how CIL funds are spent are for the council or its successor unitary authority and there can be no guarantee that this would be spent on hospital provision. - As demonstrated in the viability study (I1) development viability is tight factoring in CIL, likely s106 obligations and other policies of the plan and there is not headroom to also fund hospital provision. In summary, the Council has engaged with UHCW and SWFT on an ongoing basis to ensure alignment of plans as required by the NPPF, but the council does not support adding additional developer requirements to fund hospital provision through s106.

OTHER ISSUES: LEGAL COMPLIANCE/ SUSTAINABILITY APPRAISAL/ CONSULTATION/ EVIDENCE

4.177. The following main legal compliance issues and issues with evidence were raised in addition to those noted under specific policies above.

Issue	Sustainability appraisal inadequate as failed to correctly consider an alternative site
Who raised the issue	Prologis UK Limited; Persimmon Homes (Central); Miller Homes; Midlands Land Portfolio; GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes; Mackenzie Miller Homes
No. raising the issue	9
Council response	Many omission site promoters raise points of disagreement in relation to the consideration of their sites in the sustainability appraisal report. The council was not the author of that report and so does not respond those comment line by line. Individual representations should be reviewed for details.

	However, it is important to note that the authors of the SA report needed necessarily to make judgements based on imperfect information. The report is necessarily broad brush and geared to understanding the sustainability of proposals and identifying the potential for significant environmental effects. Others argue an omission site should have formed part of a reasonable alternative. The process by which the reasonable alternatives were identified is explained in detail in the SA report. It is inevitable that some omission site promoters will wish to dispute the Sustainability Appraisal, potentially in some cases on a line by line basis challenging every micro judgement made therein. It will be for the inspectors to determine whether examination time should be used for this. It is noted that para 5.15 of the Procedure Guide for Local Plan Examinations states “the merits of sites not allocated in the submitted plan (known as “omission sites”) will not normally be discussed at the hearing sessions. This is because the focus of the examination is on the soundness of the submitted plan”.

Issue	Sustainability Appraisal should appraise individual sites rather than grouping sites into sub-area scenarios/reasonable alternative growth scenarios
Who raised the issue	Miller Homes; Latimer Developments Ltd; Rosconn Group; Warwickshire Property and Development Group (site 90)
No. raising the issue	4
Council response	This point was considered in the Sustainability Appraisal report (CD5) which states at para 4.2.5: “Whilst individual site options clearly generate interest, they are not RAs in the context of most local plans. Were the objective to allocate one site, then site options would be RAs, but that is rarely the case for local plans. Rather, the objective is to allocate a package of sites and so RAs must be in the form of alternative packages of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining RA growth scenarios (Sections 5.3 & 5.4).”.

Issue	Sustainability Appraisal does not test the new plan period or quantum of development against other reasonable alternatives such as the preferred options scenario
Who raised the issue	Persimmon Homes (Central); Catesby Strategic Land; Stoford Properties Ltd
No. raising the issue	3
Council response	Quantum of development is discussed in paragraphs 5.2.1-5.2.21 of the SA report. The housing growth scenarios in section 5.5 do incorporate different quanta of growth. The housing growth scenarios test options that could deliver 11,729-13,414 units. The latter is 24% above LHN. Therefore, different growth quanta are tested through the reasonable alternative scenarios. Trying to test different housing requirement figures in

	the abstract, divorced from the sites needed to deliver them would not allow useful commentary on the environmental and sustainability effect of different growth quanta. By contrast, for employment land the scale of development proposed in the different growth scenarios, except for scenario 4 which is lower, is comparable. However, this is in line with the judgement made in para 5.2.19 of the SA that there is limited strategic case for significantly lower of higher growth scenarios. Plan period is a decision for the plan-makers as it comprises part of the scope of the plan. SA is determined by the scope of the plan. It would therefore not be appropriate to test options through SA that are inconsistent with the scope of the plan, for example by adopting a different plan period.

Issue	Sustainability Appraisal doesn't present any detail of the appraisal process followed; it simply provides a written commentary on the opportunities of each site/settlement, rather than based on a systematic appraisal of options against the SA objectives. Only four scenarios are referred to in the assessment (Long Lawford, South of Rugby, NW Rugby, and Lodge Farm) rather than all scenarios so not all scenarios assessed equally as required by <i>Heard judgment Heard v Broadland DC [2012] EWHC 344 (Admin) (24 February 2012) (para 71)</i>
Who raised the issue	Miller Homes; Latimer Developments Ltd
No. raising the issue	2
Council response	There are two separate points here: (1) Appraisal process insufficiently systematic (2) Failure to assess all scenarios equally Latimer Developments Ltd only make the first of those points, which they relate to the above issue about failure to appraise individual sites. Dealing first with the point about appraisal being insufficient systematic, we disagree. We suspect that the respondents may be envisaging a scoring system, which is sometimes seen in SA reports, with complex multi-criteria scoring matrices for individual sites and overall site 'scores'. This kind of analysis is in the view of the council neither helpful to plan-makers nor understandable to the public who would engage in plan-making. Furthermore, presenting judgements as complex scoring matrices or as a multi-criteria analysis gives the appearance of being systematic, but it simply hides the fact that underlying all those scores are necessarily judgements. The approach taken in the SA report is more transparent. On the second point, eight housing growth scenarios were identified (see para 6.2.1) which are different combinations of four variable components: Long Lawford, south of Rugby, North West Rugby and Lodge Farm. Accordingly, the commentary in section 6 (Growth scenarios appraisal) is structured around the differential sustainability effects of

	these component parts. The appraisal summary, at para 6.2.57 then comments on the overall performance of the growth scenarios. Overall, it is clear that each of the growth scenarios is assessed equally.

Issue	Unclear how Sustainability Appraisal has informed selection of individual housing allocations because it draws on the outputs of Stage 2 site assessment which had already selected allocations
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	This comment misses that plan-making and sustainability appraisal is a process which is not totally reducible to a final report. Both site assessment and sustainability appraisal are an iterative process. At preferred options consultation stage a greater number of alternative site options were identified in the stage 2 site assessment and were not at that point ruled out. Similarly this was the case in the interim SA report. Plan-makers and the SA consultants met to ‘workshop’ different site options at various stages in plan-making and the outcomes of this are reported in, for example, the discussion of site options at section 5.3 and 5.4 of the SA report. However, by Regulation 19 the options needed to be narrowed to a final submission version of the plan. There was a need to set out why site options which did not form part of the Proposed Submission Local Plan were not selected and the Stage 2 Site Assessment (document SS8) was updated to do this. This does not, however, mean that the site allocations were presented to the SA authors at the end of the process as a fait accompli.

Issue	SA's assessment of the reasonable alternatives is not informed by rigorous evidence to confirm that the Council has fully exhausted sustainable locations beyond the green belt, before determining that 50% of the S6 sites will be subject to green belt release.
Who raised the issue	Midlands Land Portfolio; Mitchell, Stuart
No. raising the issue	1
Council response	This is a variant of a Green Belt exceptional circumstances argument made by the promoters of non-Green Belt omission sites also in relation to Policies S6 and S7 and is responded to above.

Issue	Education models have not been published for scrutiny and transparency
Who raised the issue	Long Lawford Residents
No. raising the issue	516
Council response	An Education topic paper has been published summarising the outcomes of modelling (I11). This provides proportionate evidence for plan-making. It is important to remember that the council is producing a land use plan, not a plan for future school place provision, which is the responsibility of Warwickshire County Council (WCC) as local education authority. The education model was prepared using data kindly supplied by WCC to the council's consultants. The council is not willing to, and WCC has not consented to, the publication of the raw models and data. In the same way, the data models used to compile the Strategic Transport Assessment and Water Cycle Study are not published.

Issue	Lack of consultation on a site or policy added at Reg 19
Who raised the issue	Willis, Tim; Long Lawford Residents; Walker, Rebecca; Yates, Alan; Key-Vice, Gillian; Stretton-on-Dunsmore Parish Council; Dunchurch Park Estates Ltd; BRAID (Barnacle Residents); Warwickshire Property and Development Group (site 90); Timms, Heather
No. raising the issue	634
Council response	This comment is raised in relation to other sites/policies above. The comment is a reference to the site or policy not being identified as a preferred option as part of the second Regulation 18 consultation. The Statement of Community Involvement (SCI) specifies that a Regulation 18 consultation and Regulation 19 consultation will be undertaken for the local plan, each to last a minimum of 6 weeks. The Council has fulfilled this commitment; indeed, two Regulation 18 consultations were undertaken rather than one. It is a normal part of the process for policies or sites to be changed, added or removed between the Reg 18 and Reg 19 stages of plan-making. This enables plan-makers to respond to additional evidence that is gathered and to consultation responses received.

Issue	There is a reasonable prospect of a scheme for Gibbet Hill coming forward during the plan period and Strategic Transport Assessment should have modelled a strategic intervention there. In the absence of that, highways constraints shouldn't be referred to as a reason for rejecting site 325
Who raised the issue	GLP Europe, Nurton Developments Ltd, Mr F. B. Dewes and Mr I. Dewes

No. raising the issue	4
Council response	The first part of this comment relates to the treatment of the A426/A5 Gibbet Hill junction in the Strategic Transport Assessment (STA). The STA identifies this junction as an existing constraint and identifies mitigation at this junction as being required early in the plan period. However, a scheme for this junction is still being developed by National Highways, is currently unfunded and the nature of the scheme is unknown. It was therefore not possible for the STA authors to realistically design and model a scheme for this junction, instead it was simply unconstrained in the model on the basis that a scheme would come forward. The main substance of the omission site promoter's complaint appears to be failure to model in the STA their omission site (site 325). This site is commented upon in the STA, and this provides proportionate evidence in relation to the omission site. It is generally an unusual step for STAs to model omission sites at all. However, a decision was taken to model a small number of omission sites. Site 325 was not one of those omission sites. It was not realistic as part of a proportionate evidence base to model every omission site or combination thereof. However, the absence of modelling does not mean that it is not possible to make comment on the likely transport/highways considerations relevant to individual sites and this is what the STA does for site 325.

Issue	Green Belt assessment has placed large areas of green belt as grey belt - no explanation for how this area has been determined
Who raised the issue	Hassell, Eve; RBC Conservative Group
No. raising the issue	1
Council response	This issue is about the Green Belt Contribution Study (GBD1 and GBD2) which forms part of the plan's evidence base. These documents explain their methodology which is based on an application of national policy and guidance.

Issue	Paragraphs 6.27 to 6.29 and tables 6.28.1 to 6.28.6 of the Local Plan Viability Study state they cover testing of the cumulative impact of emerging policies. However, the figures in this table are expressed as the overall BLV whereas in the earlier tables the figures are expressed as £ per sqm so it is difficult to compare across the two sections. As the individual appraisals have not been made available it has not been possible to confirm that the cumulative assessments have been undertaken correctly.
Who raised the issue	Miller Homes
No. raising	1

the issue	
Council response	The author of the representation has misunderstood the outputs. All the outputs in tables 6.27 in the Local Plan Viability Study (l1) are residual land values which are compared to the relevant BLV for each site. The earlier tables (e.g. tables 6.19.1 to 6.19.9 and 6.7.1 to 6.7.9) are also residual land values. None of these tables are expressed in square metre values as claimed in the representations. The references to “square metres” in table headings refers to the underlying sales values applied to the residential floorspace in each table.

Issue	There appears to be an error on the base cost and total (before policy costs) stated for Houses in table 4.15.1 in the Local Plan Viability Study as the base cost is higher than the total cost. As the appraisals have not been provided it is unclear whether this error has been included in the appraisals themselves.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	This was merely a typo in the table. The correct cost has been applied in the appraisals. For the avoidance of doubt, the base cost is £1,467 per square metre (as can be seen in column 13 in Appendix 2) to which a 10% external works allowance is applied, resulting in a total of £1,613 per square metre

Issue	It is not clear why a blanket 7% professional fees has been applied across all typologies in the Local Plan Viability Study. We would typically expect to see 10% used for developments under 50 dwellings.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	Professional fees do not reduce with scale, so this suggestion is incorrect.

Issue	While there is reference at Table 6.30.1 in the Local Plan Viability Study to 5% contingency costs being assumed for Lodge Farm and North West Rugby “in line with main appraisal assumptions” there is no explanation of this figure in the assumptions section of the report and it is not apparent what it has been applied to.
Who raised the issue	Miller Homes
No. raising the issue	1
Council	All of the appraisals (both the typologies and the site allocations) incorporate a 5%

response	contingency in line with standard market practice. In the Lodge Farm appraisal within the Local Plan Viability Study (I1), it can be noted that this contingency equates to £18,951,218, which is 5% of base residential construction costs and external works (i.e. £329,586,370 plus £49,437,960). Arguably, the contingency should also be applied to the non-residential construction costs and the on-site plot construction costs. Applying the contingency to these costs would increase the contingency sum to £24,367,175.

Issue	The Lodge Farm appraisal in the Local Plan Viability Study appears to include an erroneous £1,555,000 for A426 roundabout widening, but this is not included in the list set out in table 6.31.1.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	Noted. This cost has been removed from the latest appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).

Issue	The values set out in the report for affordable housing have not been applied in the Lodge Farm appraisal in the Local Plan Viability Study. Instead, it appears that a different lower set of assumptions have been applied.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	These values were based on the South West Rugby strategic allocation FVA values. Nevertheless, in the revised appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15), we have applied the same capital values for the affordable housing in Table 4.10.1. in the Local Plan Viability Study (I1) (i.e. £190 per square foot for social rented units). For the shared ownership units, the current value of £244 per square foot equates to 70% of market value (based on £344 per square foot) which is reasonable and we have retained this figure in our revised appraisal.

Issue	The assumptions for residential areas appear to differ from the 94 sqm average GIA used for the rest of the Local Plan Viability Study.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	The floor area in the Lodge Farm appraisal equates to an average of 92 square metres per private unit compared to 94 square metres in the main appraisals. The difference is minimal, but nevertheless we have re-sized all residential units to 94 square metres in our

	revised appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).
Issue	The assumed total sales rate of 180 units per annum in the Lodge Farm appraisal in the Viability Study is not agreed with. Suggested that the total open market sales rate per annum should instead be 180 units, based on 3 open market units per month, with 5 flags at any one time. This would bring the overall sales period down from 14 years to 10.5.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	This has no bearing on the outcome of the appraisal, as the land value is negative. Argus treats this negative land value as a 'dowry' resulting in a significant understatement of finance costs (as can be noted in the appraisal, there are currently no financing costs). So, speeding up the programme makes no difference to the outcome with the appraisal structured in its current form, as there would be no change to finance costs. We have considered the impact of inputting the BLV into the appraisal as a land cost and shortening the programme in the revised appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).
Issue	The community floorspace revenue is only applied to 10% of the floor area in the Lodge Farm appraisal in the Viability Study.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	Noted. This has been amended in the revised appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).
Issue	The commercial floorspace build rates don't equate to the rates quoted in the report in the Lodge Farm appraisal in the Viability Study.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	The commercial build rates reflected the assumptions made by the landowners of the South West Rugby strategic sites in their FVAs. The representation does not refer to a specific table in our report, we therefore assume that they are referring to the construction costs in Table 4.15.1 in the Local Plan Viability Study (I1). We have departed from the costs applied by the landowners at South West Rugby and applied the costs in Table 4.15.1 in our revised appraisal in the Local Plan

	Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).
Issue	Considered that sales values should be increased above £340 per square foot to £344 in the Lodge Farm appraisal in the Viability Study.
Who raised the issue	Miller Homes
No. raising the issue	1
Council response	No evidence has been submitted to support this revised figure, but we have tested it in our revised appraisal in the Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation document (I15).

OTHER ISSUES: POLICIES MAP

4.178. 11 representations on behalf of 12 individuals or organisations raised issues of soundness with the policies map. 1 representation on behalf of one individual/organisation argued that the policies map is sound.

Issue	Green Belt boundary in Wolston should be updated to return Linden Tree Bungalow site allocated in the 2019 Local Plan to the Green Belt due to omission of key information at the time of allocation making this site not legally compliant
Who raised the issue	Larkin, Thomas
No. raising the issue	1
Council response	Linden Tree Bungalow was allocated for development in the Local Plan 2011-2031 and at that time removed from the Green Belt and subsumed into the settlement boundary of Wolston. The position of the council is that the site can now come forward as windfall. The respondent argues that the highways evidence produced for the 2011-2031 local plan was deficient in relation to the safety of the access. Mr Larkin attended the local plan examination in 2018, and his arguments were considered by the inspector in assessing the suitability of the site allocation. The council has not seen anything to suggest that suitable access to the site could not be achieved. However, any planning application that were to come forward on the site would need to be assessed by the local highways authority in relation to the suitability and safety of the access. Overall, the council does not consider that there are exceptional circumstances demonstrating that the Green Belt needs to be changed to include the site within the Green Belt.

Issue	Settlement boundary for Houlton should be extended to include the areas of green space and playing pitches
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The council disagrees. There is not a reason why these areas should be subsumed into the settlement boundary as they are proposed for public open space. Including these areas within the settlement boundary would be inconsistent with the drawing of the settlement boundary elsewhere in Rugby. For example on the southern edge of Rugby where Diamond Jubilee Country Park and Rugby Borough Football Club are not included within the settlement boundary.

Issue	Not necessary to remove the existing industrial estates at Ansty Park and Prologis Park Ryton from Green Belt and so contra NPPF para 148
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The rationale for removing these areas from the Green Belt is set out in the Green Belt Exceptional Circumstances Topic Paper (GBD4). Given new allocations are proposed to be removed from the Green Belt consistency would suggest removing these longstanding employment areas from the Green Belt. The Green Belt evidence (GBD1) shows the areas make very limited/no contribution to Green Belt purposes and are grey belt. Removing these sites from the Green Belt would help their future operation as employment sites by removing the need to demonstrate very special circumstances for development and notify the government's planning casework unit before a decision is made.

Issue	Remove area of site 130 shown as suitable for wind energy development as site is promoted for employment use and is not available for that use
Who raised the issue	Stoford Properties Ltd
No. raising the issue	1
Council response	The areas shown are those assessed by the council as potentially suitable for wind farm development in accordance with NPPF para 165b). The evidence for this is documents CL3 and CL4. Identifying areas as suitable is not the same as a site allocation. These areas have not been promoted for wind energy development and the fact that current land promoters are not proposing the land for wind energy development does not affect its potential suitability for this.

Issue	Extend the Rainsbrook Valley Landscape of Elevated Sensitivity (EN3) designation to the whole of the valley - grounds for limiting its scope are unsupported.
Who raised the issue	J Marine Limited
No. raising the issue	1
Council response	The extent of the landscape designation is based on document EN3, which provides the evidence for this. We do not have evidence to support the extension of the area. The southern edge of the valley lies within West Northamptonshire district and any protection for this would be a matter for West Northamptonshire Council.

Issue	Rugby Urban Area boundary is not clearly defined on the map (nor in the plan itself)
Who raised the issue	Rosconn Group
No. raising the issue	1
Council response	The settlement boundary for Rugby and other settlements is clearly defined on the policies map and referred to in Policy S5 Countryside Protection.

Issue	Land off Hinckley Road (M6 Junction 2) should be removed from the green belt designation as the evidence base does not support its inclusion given poor performance to green belt functions
Who raised the issue	Swanvale Developments Ltd
No. raising the issue	1
Council response	The council's Green Belt evidence does not support the contention that this omission site lies in an area which contributes weakly to Green Belt purposes. However, in any event, there is no assumption that areas which are potentially grey belt should be removed from the Green Belt.

4.179. Below is a summary of some of the modifications to the policy proposed in representations, together with the council's response. This list isn't necessary comprehensive of all modifications proposed, and individual representations should be read for the full text of proposed modifications.

Modification summary	Proposer(s)
Extend the Rainsbrook Valley Landscape of Elevated Sensitivity (EN3) designation to the whole of the valley - grounds for limiting its scope are unsupported.	J Marine Limited
Coventry Stadium, Brandon should be designated as a sports facility on the Policies Map to ensure consistency with other policies that see protected areas already	Carter, David

designated on map.	
Council response to modification proposals: The council's response to the point raised by J Marine Limited is outlined above. In relation to the suggestion of David, Carter the council does not consider it necessary for soundness to identify Coventry Stadium, Brandon or other community facilities on the map.	

APPENDIX 1: STATEMENT OF REPRESENTATIONS PROCEDURE

STATEMENT OF REPRESENTATIONS PROCEDURE

Rugby Borough Council Local Plan 2025-2042 Proposed Submission Local Plan Regulation 19

1. STATEMENT OF REPRESENTATION

- 1.1 Rugby Borough Council intends to publish and submit a Proposed Submission Local Plan for examination, in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19, 20, 21 and 35), as amended (the Regulations).

2. TITLE OF DOCUMENT

- Rugby Borough Council Local Plan 2025-2042 Proposed Submission Local Plan

3. SUBJECT MATTER AND AREA COVERED

- 3.1 The Local Plan sets out the future land use planning policies for Rugby Borough through the period 2025 to 2042. It is a legal document which all councils are required to prepare. It will be used to assess all planning applications received by the Council and allocates land for new housing and employment developments, in line with national policy and requirements.
- 3.2 The Proposed Submission Local Plan is a single, comprehensive local plan which combines the spatial strategy, strategic policies and site allocations, in addition to development management policies. Once adopted, this Local Plan will replace the current Rugby Borough Council Local Plan 2011-2031, adopted in June 2019.
- 3.3 This Statement of Representations Procedure will be available for inspection alongside the plan documents and evidence base.

4. HOW TO VIEW THE LOCAL PLAN DOCUMENTS

- 4.1 The Rugby Borough Council Proposed Submission Local Plan and all supporting documents are available to view online and download at:
<https://www.rugby.gov.uk/local-plan-consultation>

4.2 Hard copies of the documents are available for inspection at the following locations within their normal opening hours:

- Town Hall, Evreux Way, Rugby, CV21 2RR
- Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ
- Dunchurch Community Hub and Library, The Green, Dunchurch, Rugby, CV22 6PA
- Wolston Library and Information Centre, Manor Estate, Wolston, Coventry, CV8 3GX

4.3 Please check opening times for libraries at:

<https://www.warwickshire.gov.uk/findalibrary>

5. WHEN TO MAKE REPRESENTATIONS

5.1 Representations must be made during the consultation period which runs from **Friday 30th January 2026 to 5:00pm Friday 13th March 2026.**

5.2 Representations received outside this period will not be considered by the council or sent to the Planning Inspectorate.

6. HOW TO MAKE REPRESENTATIONS

6.1 Representations should be made using the Representation Form. The Representation Form can be downloaded from:

<https://www.rugby.gov.uk/proposed-submission-local-plan>

6.2 Hard copies of the Representation Form are available in locations where documents are available for inspection (see 4.2 above).

6.3 Completed Representation Forms can be submitted either by email or in writing:

- By email to localplan@rugby.gov.uk with 'Proposed Submission Consultation' in the subject line, OR
- By post to
Proposed Submission Consultation,
Development Strategy,
Town Hall,
Evreux Way,
Rugby,
CV21 2RR

6.4 Your representation may be accompanied by a request to be notified at a specified email or postal address of any of the following:

- Submission of the local plan for independent examination under section 20 of the Planning and Compulsory Purchase Act 2004 (the Act)
- The publication of the recommendations of the person appointed to carry out an independent examination of the local plan under section 20 of the Act
- The adoption of the local plan

6.5 We must receive your representation **by 17:00 on Friday 13th March 2026**.

6.6 **Representations must include your full name and address.** The Council cannot accept anonymous submissions and they cannot be considered by the Planning Inspector.

7. WHAT HAPPENS AFTER THE CONSULTATION

7.1 After the Regulation 19 consultation closes, the Council will review all representations made and prepare the plan for submission to the Planning Inspectorate to be examined.

7.2 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.

7.3 The Rugby Borough Council Privacy Notice for Development Strategy is available here: <https://www.rugby.gov.uk/w/privacy#development-strategy>

7.4 The Planning Inspectorate's privacy notice can be accessed here: <https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices>

7.5 Once submitted, an independent Planning Inspector will be appointed by the Secretary of State for Communities, Housing and Local Government to carry out an independent examination into whether the plan is legally compliant, passes the tests of soundness, and meets the duty to cooperate.

7.6 The examination will include hearing sessions held by the Planning Inspector in public where those who have made representations during this Regulation 19 Consultation will have a right to speak. Please indicate if you wish to be invited by the Planning Inspector to speak during a hearing session on your Representation Form.



Please ask for
E-mail Address

Nicola Smith
nicola.smith@rugby.gov.uk

Rebecca Quinlan
Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN

Date

27 April 2026

By email only:

Rebecca.Quinlan.07@planninginspectorate.gov.uk

Cc:

Plans.admin@planninginspectorate.gov.uk

Dear Rebecca

Submissions of the Rugby Borough Local Plan 2025-2042 to the Secretary of State for examination

1. Rugby Borough Council is pleased to formally submit our Local Plan 2025-2042 to the Secretary of State for examination. All submission documents are included in the enclosed submission documents list.
2. I also enclose, as a separate attachment, our completed Planning Inspectorate pre-submission checklist.
3. If the inspectors (once appointed) require hard copies of any of the documents, please let us know.
4. Copies of all submission documents will be deposited at Rugby Town Hall and at libraries and are available on the examination website:
<https://www.localplanservices.co.uk/rugbylocalplanexamination> The documents deposited at the town hall and libraries do not include hard copies of representations received at Regulation 19 stage. Under Regulation 22(3)(iii) of The Town and County Planning (Local Planning) (England) Regulations 2012 the volume of representations received means that it is not practicable to make hard copies of these available at the deposit points. Electronic copies of the Regulation 19 representations are available on the examination website.

Programme Officer

5. Ian Kemp Ian Kemp ian@localplanservices.co.uk T: 07723 009 166 has been appointed as programme officer.

Modifications

6. Rugby Borough Council requests under Section 20(7C) of the Planning and Compulsory Purchase Act 2004 that the Inspector(s) recommend modifications needed to make the plan sound and legally compliant, if necessary. Please treat this letter as our formal request.
7. Core document CD20 is a schedule of suggested modifications. The modifications are split into those that are corrections/minor clarification points and can be addressed as additional modifications and those which are relevant to issues of soundness and so may need to be considered as main modifications.
8. The modifications put forward are not extensive in scope and comprise relatively minor detailed wording changes or additions. These are modifications proposed by the council in response to representations made in response to the Regulation 19 consultation or based on statement of common ground negotiations with prescribed bodies. As such, these modifications have not been subject to public consultation.

Statements of common ground

9. Documents SOCG1-SOCG16 are statements of common ground with 15 neighbouring authorities and prescribed bodies.
10. One draft statement of common ground, with Historic England (SOCG10), is submitted. Historic England have advised that they need more time to formulate their response to the new material prepared in response to their objection to site 121 Walsgrave Hill (see the section titled “Additional Evidence” below).
11. It is anticipated that a signed statement of common ground with Historic England will be concluded on or around 13 May 2026 and will be submitted by the council at that point.
12. Additionally, SOCG6 with Stratford on Avon and Warwick District Councils is an agreed final version which has been signed by Warwick District Council and Rugby Borough Council but not yet signed by Stratford on Avon District Council. Once Stratford on Avon District Council has signed, an updated copy will be submitted to the examination.
13. All other submitted statements of common ground have been signed.

Additional Evidence

14. The following documents comprise additional evidence which did not form part of the Regulation 19 consultation. As detailed below, the new evidence is explanatory and is produced in direct response to representations made to the Regulation 19 consultation. The new evidence provides further explanation and technical detail to assist the examination of soundness. It supports the conclusions in the evidence base available at Regulation 19 stage and is not being used to justify proposals for modifications to the plan. The council’s view is that the plan is sound without this additional evidence.

15. Interested parties had fair opportunity to comment on the plan and its evidence base at Regulation 19 stage. The additional documents do not introduce materially new issues. Therefore, the council considers that no additional public consultation on these documents was necessary.
16. The documents are as follows:
 - Document SS28 Heritage assessment addendum for Site 353 Town Hall, Rugby – produced to respond to Historic England’s representation at Regulation 19 stage. This is evidence supports the submitted plan and no modifications are proposed based on it.
 - Documents WH1 Walsgrave Hill Heritage and Landscape Analysis and WH2 Walsgrave Hill County Park Strategy comprise material produced by the Walsgrave Hill (site 121) site promoters in response to Historic England’s representations at Regulation 19 stage. The position of the council in the proposed submission plan is that the public benefits of the proposal can outweigh the harm to heritage assets, the degree of which can be reduced through mitigation. Historic England objected to the site allocation and to respond to that objection the site promoters prepared more detailed analysis of the heritage and landscape impacts, and more detail on the mitigation strategy and the proposed country park. Both the mitigation strategy and the country park were inherent in the proposed submission local plan consulted on at Regulation 19 stage. The new material provides greater detail on how these could be delivered and analysis of heritage and landscape impacts. Although the new material is prepared by the site promoter, it was prepared at the request of the council, and its scope and methodology were agreed by the council’s heritage consultant. Therefore, the new material is evidence to support the submitted plan and allow a greater understanding of the issues raised by Historic England. The documents also inform the draft Statement of Common Ground with Historic England.
 - Document WH3 Heritage assessment Addendum for Site 121 Land at Walsgrave Hill. This is an update to the heritage assessment prepared and consulted on at Regulation 19 stage. It confirms the conclusions of the original assessment and includes comments on the additional analysis and details of the mitigation strategy and country park provided through documents WH1 and WH2. The note confirms the council’s position in the proposed submission plan consulted on at Regulation 19 stage. This document was prepared in response to the Regulation 19 representations of Historic England and informs the draft Statement of Common Ground with Historic England.
 - Document H3 Rugby Updated Housing Needs Evidence Report- Addendum on Affordable Housing Need over the 2025-42 plan period. This is short clarificatory note on affordable housing need in response to representations submitted at Regulation 19. The note confirms the affordable housing need position in previous evidence. No modifications are proposed based on it.
 - Document I16 Response to National Highways review of traffic modelling. This document was produced in response to National Highways’ representation to the Regulation 19 consultation which requested this additional information.

This supports the submission plan, and no modifications are proposed based on it.

- Document I14 Rugby Strategic Transport Assessment Additional Responses to Regulation 19 Submissions – Walsgrave/Ryton Employment Allocations. This document is produced to respond to a representation made by Prologis (the promoter of the Ryton West employment omission site) in relation to the transport modelling of Toll Bar End junction at Regulation 19 stage. The note confirms the conclusions of the strategic transport assessment in relation to impact at that junction. The note provides, as an additional sensitivity, the results of further testing of the impacts of the plan and the Ryton West omission site on the Toll Bar End junction using the Kenilworth and Southam Wide Area model. This junction had already been modelled through the Strategic Transport Assessment and the additional modelling supports the conclusions reached therein. No modifications are proposed based on this evidence which supports the submission plan.
- Document I15 Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation. The viability note responds to criticisms of the whole plan viability assessment raised by Miller Homes (the promoter of the Lodge Farm omission site) in its Regulation 19 consultation response. The note makes a correction to the appraisal of the Lodge Farm omission site. The clarificatory note confirms the position in the submitted plan and the whole plan viability assessment and no modifications are proposed based on it.
- Document I17 Updated Infrastructure Delivery Schedule. One addition is made to this schedule “New recycling centre and waste transfer station”. This is added to respond to a Regulation 19 representation from Warwickshire County Council which objected to the omission of this. The reference in the Infrastructure Schedule to provision of a recycling centre and waste transfer station support a proposed additional modification to the reasoned justification to Policy I4 (see document CD20). Neither change is considered by the council to be necessary to address an issue of soundness. The provision of these facilities is a matter for the waste local plan of Warwickshire County Council. This is clarificatory text only.

17. In addition, documents CD21 (Sustainability Appraisal Scoping Report 2023) and SD17 (Rugby Borough Economic Strategy 2025-2035) are documents that were published and available on the council’s website at the time of the Regulation 19 consultation but did not form part of the consultation document list. Document CD20 was published and consulted on at an earlier stage of plan making (Regulation 18 issues and options stage). Document SD17 is a corporate strategy of the council and was subject to its own public consultation and adoption process. Neither document comprises new evidence, but they are added to the submission documents list for completeness

Notice of submission

18. Notification will be sent to all those who have commented on the Proposed Submission Local Plan, requested to be kept informed of progress on the Local Plan, or have asked to be notified of when we have submitted the Local Plan for examination.

19. We look forward to hearing from you with details of appointment of the inspector(s) and likely hearing dates.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nicola Smith', is positioned above the typed name.

Nicola Smith MRTPI
Strategic Director for Place

Encs.

Rugby Borough Local Plan 2025-2042 schedule of suggested modifications April 2026

This schedule includes two parts:

Part A: These are proposed additional modifications These are considered by the council to be non-material changes that are not necessary to address issues of soundness.

Part B: These are proposed modifications which may affect soundness.

Both Part A and B are modifications identified in response to representations made to the Regulation 19 consultation or statement of common ground negotiations with prescribed bodies. As such, these modifications have not been subject to public consultation.

Part A: additional modifications

Reference	Correction	Explanation
Page 7. Strategic priorities and policies	In the first sentence on the page, correct to Planning and Compulsory Purchase Act <u>2004</u> not 2024	Typo
Page 7. Strategic priorities and policies	In the table, in the list of strategic policies under the heading “Provision of employment land” correct S2 to <u>S3</u>	Typo
Page 32. Policy C1 B.i. Rugby town centre	“support the town centre’s role as a <u>retail</u> , leisure and entertainment destination including a wide ranging food and beverage offering;	Additional underlined word proposed by Warwickshire County Council. This minor change to policy wording is not considered by the council necessary to address an issue of soundness and is therefore an additional modification.
Page 32. Policy C1 B.vii. Rugby town centre	“support the <u>conservation and</u> enhancement of heritage buildings <u>and their settings</u> .”	Additional underlined text proposed by Historic England. This minor change to policy wording is not considered by the council to be necessary to address an issue of soundness and is therefore an additional modification.
Page 43. Policy EN6 Canopy Cover	Change title of policy to 'EN6 <u>Tree</u> canopy cover' and change all instances of 'canopy cover' to ' <u>tree</u> canopy cover' within the policy and explanatory text.	To clarify that the policy is regarding tree canopy cover not man-made canopy cover.
Page 44 paragraph 5.21	Delete duplicate full stop at end of paragraph.	Typo.

Reference	Correction	Explanation
Page 71. Policy I4 Infrastructure and planning obligations, reasoned justification after paragraph 9.13	Add new text " <u>The need for a new recycling centre and waste transfer station has been identified by Warwickshire County Council</u> ".	Additional text requested by Warwickshire County Council. This change is not considered by the council to be necessary to address an issue of soundness. This is clarificatory text in the reasoned justification and therefore an additional modification.
Page 77 table of parking standards for Use Class B and Use Class C1 – Hotels and hostels	Replace under the heading “Cycle parking” the word “stand” with “space”	For consistency.
Page 115. Development site allocation annex for site 353 Town Hall, rugby	Correct allocation from "circa 124 dwellings" to "circa <u>114</u> dwellings"	Typo. Correction needed for consistency with Policy S6.
Page 134 Site ID: 348 The Croft, Stretton-on-Dunsmore	Remove bold formatting from site ID number	Formatting correction for consistency with other sites.
Policies map, residential allocations layer	Minor alterations to the policies map polygon for site 338 Land south of Crick Road, Houlton to make it consistent with the red line boundary shown in the plan in the Development site allocations annex (p130).	Correction of a cartographic error. To ensure consistency.

Part B: modifications which may affect soundness

Reference	Change	Explanation
Page 45. Policy EN7 Flood risk.	Additional policy paragraph: “ <u>D. Development should, where opportunities exist, restore and enhance watercourses. This includes measures such as de-culverting, removal of redundant structures and channel naturalisation to improve flood conveyance, biodiversity and amenity.</u> ”	Additional text requested by The Environment Agency through statement of common ground negotiations.
Page 133. Development site allocations annex for site 81 Land West of Fosse Way, Stretton-on-Dunsmore	Add underlined text: “Proactive archaeological investigation should be undertaken to inform the mitigation strategy. <u>Archaeological investigation to inform preservation by design if Roman Road, Roman buildings and/or evidence are present.</u> ”	Additional text requested by Historic England through Regulation 19 consultation response. This text is clarificatory and adds further detail about the archaeological investigation needed.

Reference	Change	Explanation
Page 136. Development site allocations annex for site 136 land north of Warwick Road, Wolston	Add requirement " <u>Development should not come forward until extraction of minerals and restoration at nearby Wolston Quarry has been completed</u> ".	This text is proposed to be added based on a request from Warwickshire County Council in Statement of Common Ground negotiations.
Page 146. Development site allocations annex for site 121 Land at Walsgrave Hill. First bullet point.	Add the following text to the first bullet point: "Creation of a continuous circa 75ha publicly accessible country park adjoining Combe Abbey County Park. <u>The planning application shall include a detailed country park masterplan for approval.</u> "	To provide additional details of the country park to be secured through the site allocation.
Page 146. Development site allocations annex for site 121 Land at Walsgrave Hill. Eleventh bullet point.	Amend the eleventh bullet point as follows: "Planted boundaries are to be reinforced <u>and woodland planting introduced alongside topographical reprofiling</u> to screen or filters views in and out of the site, particularly ~~in relation to from~~ the registered park and garden and nearby historic farmsteads. <u>This shall be set out in a comprehensive landscape strategy.</u> "	To provide additional detail on the mitigation strategy for the site.
Policies map, areas of separation layer	Minor alterations to the northern boundary of the Area of Separation at Dunchurch to exclude South West Rugby development areas in line with the latest South West Rugby planning applications.	To ensure that the Area of Separation does not include land that is to be developed as part of South West Rugby.

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2021-2024) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Growth and Investment, Development Strategy
Policy/Service/Change being assessed	Proposed Submission Rugby Borough Local Plan 2025-2042
Is this a new or existing Policy/Service/Change?	New policy
If existing policy/service please state date of last assessment	N/A
Ward Specific Impacts	All wards
Summary of assessment Briefly summarise the policy/service/change and potential impacts	The local plan seeks to advance an ambitious climate and nature agenda through its policies and site allocations. Overall, the impacts should be positive on wider climate change strategy objectives. Wider Sustainability Appraisal of the plan and Habitats Regulations Assessment are included as appendices 3 and 4 to the cabinet report.
Completed By	Neil Holly
Authorised By	Nicola Smith
Date of Assessment	10 December 2025

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	☒	☐	☐	No impact on council owned resources			
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	☒	☐	☐	No impact on the production of energy for council activities			

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	☐	☒	☐	The plan includes an ambitious net zero policy for new buildings.	N/A		
Transport	☐	☒	☐	The plan includes new housing employment land to be developed in the period to 2042. Locations were selected for the access to services and facilities or (in the case of employment land) workforce. This should have a significant beneficial effect ahead of not putting a plan in place.	N/A		
Natural Environment	☐	☒	☐	The plan includes requirements for 20% canopy cover for new major development, delivery of biodiversity net gain close to development sites and for the allocation of significant new public open space/country parks. This should have an overall positive impact in comparison to not putting a plan in place. There will be negative impacts of the quantum of development	N/A		

Appendix 9

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
				proposed but the council does not have the choice to pursue lower scales of new development.			
Homes and Energy	☐	☒	☐	The plan includes an ambitious net zero policy for new buildings. Locations that are potentially suitable for renewable energy development are identified in the plan.			
Waste, Resources and the Circular Economy	☒	☐	☐	Waste and minerals planning are 'county matters' and the responsibility of Warwickshire County Council.			
Climate and Nature Positive Communities	☐	☒	☐	Overall the climate and nature policies should support climate positive new and existing communities.			
Adaptation	☐	☒	☐	New policy moves adaption principles form the existing SPD into policy to give them more weight.			

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	At plan adoption in 2027 (date to be confirmed)
Key points to be considered through review	Outcome of the Regulation 19 public consultation and examination process which could lead to amendments to proposed policies.
Person responsible for review	Neil Holly
Authorised by	Nicola Smith

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:

Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509



Equality Impact Assessment

Service Area	Growth and Investment
Policy/Service being assessed	Local Plan – Pre-submission (Regulation 19) version
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	New policy Rugby Borough has a local plan (2011-2031) which was adopted in 2019. It is necessary to review the local plan every 5 years to determine whether it is still up to date. The Council decided to commence a full review of the local plan, and has subsequently held two public consultations: Issues and Options (October 2023-2024) and Preferred Options (March-May 2025). An EQIA was produced for the decisions in respect of both of these consultations.
EqIA Review Team – List of members	Hayley Smith
Date of this assessment	03 December 2025
Signature of responsible officer (to be signed after the EqIA has been completed)	

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	A local plan sets out policies for land use and development. It sets out the strategy for meeting the borough's housing and employment needs over the plan period, along with required infrastructure. In addition, the stated objectives of the local plan are: 1) Support the diversification and growth in sustainable locations of Rugby Borough's economy in line with the Economic Strategy 2) Support the revival of Rugby Town Centre 3) Reduce carbon emissions and adapt to climate change 4) Raise design standards 5) Deliver infrastructure-led growth 6) Facilitate a greener, more biodiverse borough

(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	The local plan is relevant to and aligns with and supports the Council's Corporate priorities: A healthier Rugby – land use and development have a role in promoting healthy behaviours and lifestyles, by affording opportunities for active travel and access to quality parks and open space. In addition, the necessary health facilities and services to support housing growth also form part of the local plan and Infrastructure Delivery Plan. A thriving Rugby – the local plan is part of the 'how' identified in the Corporate Strategy for delivering this priority, and it is amongst the stated objectives of the local plan to support diversification and growth in line with the Economic Strategy and support the revival of Rugby Town Centre (see above). The publication draft of the plan (Regulation 19), includes a spatial strategy and land allocations for employment growth, as well as policies to support the wider economy and Rugby Town Centre. Policy C1 specifically seeks to support the revitalisation of the town centre through specific interventions, including the cultural quarter referenced in the corporate priorities as well as placemaking principles to guide the quality of the environment. A greener Rugby – the publication plan (Regulation 19) includes a policy section on 'climate' which relates to mitigation and adaptation to climate change in line with this corporate priority. It includes a policy to require new buildings to be net zero in operation, a policy to support renewable energy and low carbon technology, a policy on water and efficiency and a climate adaption policy. The 'environment' section of the local plan includes policies on biodiversity and landscapes, and site allocations include principles related to the provision of open space as appropriate. A fairer Rugby – the overarching purpose of the local plan is to set out the borough's development needs over the plan period and the strategy for how these will be met. Housing is a key part of this, and aligns with this corporate priority. The 'housing' section of the plan includes policies regarding affordable housing, specialist housing and HMOs as well as policies relating to housing standards, aimed (in combination with other design policies) at improving the quality of housing delivered.

(3) What are the expected outcomes you are hoping to achieve?	The local plan sets out the strategy for how the housing, employment and other development needs of the borough will be met over the plan period. It also sets out policies against which planning applications will be assessed and which will therefore guide decision making.
(4) Does or will the policy or decision affect: • Customers • Employees • Wider community or groups	Given the policy content, the geographical scope of the local plan (i.e. the entire borough), and the extent of the plan period to 2042, the local plan has the potential to affect many people who live and/or work in the borough, and who visit during the plan period and beyond. As such, the content of the document is relevant to the Public Sector Equality Duty.
(5) Will the policy or decision involve substantial changes in resources?	Upon adoption of the new local plan (anticipated in 2027), it will replace the currently adopted local plan. Substantial changes in resources are not therefore envisaged.
<u>Stage 2 – Evidence about user population and consultation</u>	As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

(1) What does the data tell you about the groups this policy or decision impacts?

Possible data sources:

- national statistics/census data
- local statistics
- evaluations
- analysis of complaints
- user feedback
- outcomes from consultation/community voice
- Council published information, service data
- [District and Ward Profile – Warwickshire Observatory](#)
- [Office of National Statistics](#)
- [Fingertips health profiles](#)
- [Indices of Multiple Deprivation](#)
- [RBC Annual Workforce Equality Report](#)

The data analysis for the local plan has been through a range of evidence base documents. In relation to the local population, these notably include (not an exhaustive list):

- Housing and Economic Development Needs Assessment (HEDNA) (2022) and Addendum Report (2024) – this report was prepared on behalf of the Coventry and Warwickshire Local Authorities to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land needs.
- Housing Needs Report (2025) – updates the housing need information in the HEDNA for different groups
- Gypsy and Traveller, Travelling Showperson and Houseboat Accommodation Needs Assessment (2025) – addresses the specific needs of these groups to inform how these may be met through the local plan.
- The Development of the Borough 2011-2024 topic paper – this paper provides a broad overview of how the borough has changed over this period, focussing on demographics, housing, the local economy and the built environment.
- Houses in Multiple Occupation (HMO) topic paper (2025) – this paper examines trends in HMOs within the borough, and examines ways in which the Council might manage their development.
- Sustainability Appraisal (2025) – an evaluation of the social, economic and environmental impacts of the development plan, including reasonable alternative strategies.
- Education topic paper (2025) – this paper summarises the key findings of modelling undertaken for school place provision across the borough. This modelling has informed the spatial strategy of the plan.

(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?	The process leading to the production of the Regulation 19 local plan has included two public consultations: • Issues and Options (Regulation 18) October 2023 – February 2024 • Preferred Options (Regulation 18) March-May 2025 Details of how the consultations were conducted, summaries of the feedback received, and how at each stage the plan has been amended to reflect the feedback, are set out in the 'Consultation Statement' to be published as part of the evidence for the Regulation 19 publication plan. In addition to the public consultations, officers have liaised with infrastructure and service providers throughout the evolution of the plan, as well as other stakeholders under the Duty to Cooperate. A Duty to Cooperate Statement is in preparation. In summary, all of the above have shaped the strategy and policies of the local plan, with the aim of delivering the objectives outlined above. This EQIA therefore provides a high-level assessment of various policy areas highlighted, based on the protected characteristics. The plan primarily relates to the use and development of land, and seeks to address people's needs in relation to how land is used (i.e. for homes, employment, transport, services and facilities, and in the creation of a well-designed, safe and healthy environment). As such, the policies are intended to have overall beneficial effects for the local population, as they are designed and written to address the needs of everyone. These beneficial effects extend most notably to 'protected characteristics' and other relevant characteristics that can act as a barrier to those needs being met. Appendix 1 sets out a high-level assessment of the impacts of each policy within the Regulation 19 plan on protected characteristics. This illustrates a neutral or positive impact of all policies.

(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.	Further to the above consultations, there will be another public consultation on the publication plan (Regulation 19). Following this consultation the plan will be submitted for independent examination in public.		
<u>Stage 3 – Analysis of impact</u>			
(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified	Protected Characteristic	Nature of Impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high

for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.	Age	Positive impact. The local plan includes consideration of family housing provision, including affordable housing. The Housing Needs Report (2025) (from p42) sets out the affordable housing need in the borough and updates the position set out in the HEDNA. The plan seeks to ensure that infrastructure is aligned to development (e.g. schools, health, open space and active travel networks). Evidence of school places (see topic paper) for example, has informed the strategy. According to 2021 census data, 18.1% of the borough's population is aged over 65 (see Housing Needs Report (2025) from page 91 which updates the information in the HEDNA from page 305). Housing policies (specifically H6) and land allocations support the provision of specialist housing for older persons.	Low

	Disability	Positive impact There are a wide range of needs amongst people living with disability. It is recognised that there can be multiple barriers to living independently and to health and wellbeing. These can include isolation, access to services, transport options, and undersupply of specialist or flexible housing. All of these matters which are relevant to the local plan, which seeks to provide accessible, healthy and inclusive streets, spaces/public realm, open spaces and buildings. Evidence was developed as part of the HEDNA and updated in the Housing Needs Report (2025) in relation to housing needs for people with disabilities. In response, the plan includes policies and allocations for specialist housing, with links identified between age and disability. In addition, policy H7 sets out standards for new housing, including adaptable buildings, and	Low/medium
	Page 10 of 23	meeting requirements for wheelchair users.	

	Sex	No direct impact. The pattern and location of development may have some impacts with regard to gender. These can sometimes be linked to other characteristics such as age, as on average women live longer than men.	Low
	Gender reassignment	No direct impact. Local plan policies seek to respond to the needs of all in the community, avoid discrimination and promote inclusivity. No direct impact is concluded on gender reassignment, though a range of policies will be applicable depending on the individual/household circumstance.	Low
	Marriage/civil partnership	No impact. This characteristic is not considered to be affected differently by the policies within the local plan.	Low

	Pregnancy/maternity	No direct impact. Although it is concluded that there is no direct impact, it is considered that a range of policies within the plan will be applicable depending on the individual/household circumstances. A proportion of the population will be pregnant at any time and/or looking after young children. This may have implications for their housing need, and access to facilities including health care and open space, and eventually schools. How these matters are addressed is relevant to the local plan.	Low

	Race	No direct impact /positive impact The local plan policies and allocations aim to ensure that there is sufficient land to meet the housing and other needs of the population. Policy S4 specifically identifies allocations to meet the accommodation needs of gypsies and travellers as set out in the evidence base. This policy demonstrates a supply of land for gypsy and traveller accommodation, which has not been the case in the current adopted local plan. Hence this is considered a positive impact compared with the current position. Whilst S4 does not identify supply for the entire plan period, efforts continue through the Duty to Cooperate to address this matter.	Low

	Religion/belief	Limited positive impact. Individuals and groups of different religions and faiths may face barriers in accessing suitable places of worship. The local plan can influence the protection of existing community facilities and the location of any new facilities, and can therefore influence opportunities for religious groups to practice their religion and worship	Low
	Sexual Orientation	No direct impact. No direct impact is concluded, though some policies may be relevant dependent upon individual/household circumstances.	Low
(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty,	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high

geographically disadvantaged communities? If yes, please explain how?	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive As set out above, the evidence underpinning the local plan, the land use and development strategy and policies within it, take account of a range of needs to ensure that the borough delivers the right types of developments for a range of needs. In meeting the identified needs, the local plan aims to have a positive impact in reducing social inequalities. In respect of socio-economic inequalities, the development of the local economy, employment opportunities and skills and community facilities are all influenced by the local plan. A list of policies and an assessment of impact is included in Appendix 1.	Medium

	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	Positive. Housing delivery and transport links are directly influenced by the local plan, as is access to services. Policies are included in relation to air quality, open space and amenity related design requirements.	Medium
(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will: a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic	The local plan is concerned with land use and development. There are factors within this which can influence the advance of equality, as has been highlighted above. In summary, the local plan can influence equality of opportunity through planning to meet identified housing need, planning for employment land for jobs, and appropriate expansion or new facilities and services such as school places, where needed. It can also influence opportunities for active travel, supporting local trips, and public transport provision (albeit this is delivered by others) to provide improved accessibility within the borough and beyond. In meeting the development needs of the local community, the local plan has a role in supporting good relations, as frictions and disparities between groups may be reduced.		
(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?	Not applicable. The local plan includes strategy and policy.		

(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used? If no Equality Monitoring Data is being collected, why not? For support with this section, please refer to the Equality Monitoring Guidance.	The Council will monitor the implementation and impact of the local plan through the production of its Authority Monitoring Report (AMR). The AMR includes information on delivery against local plan policies, including (but not limited to) the provision of housing (including affordable housing), and employment development.
(6) Complete this section if any adverse impacts were identified in 3.1. Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.	N/a – no adverse impacts identified.

<u>Stage 4 – Action Planning, Review and Monitoring</u>	
(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)? The feedback/data should be used to inform your Action Plan in (2)	

If No Further Action is required then go to – Review and Monitoring (2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.	EqIA Action Plan																													
(3) Review and Monitoring State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?	<table border="1"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date for completion</th> <th>Resource requirements</th> <th>Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Action	Lead Officer	Date for completion	Resource requirements	Comments																								
Action	Lead Officer	Date for completion	Resource requirements	Comments																										

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (03 December 2025) and will be reviewed at the point of adoption of the local plan.’

Appendix 1 – Equalities Impact Assessment, Regulation 19 local plan

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
S1 – Settlement hierarchy	0	0	0	0	0	0	0	0	0
S2 – Strategy for homes	+	+	+	+	+	+	+	+	+
S3 – Strategy for employment land	+	+	+	+	+	+	+	+	+
S4 – Sites for Gypsies and Travellers	0	0	0	0	0	0	+	0	0
S5 – Countryside Protection	0	0	0	0	0	0	0	0	0
S6 – residential allocations	0	0	0	0	0	0	0	0	0
S7 – employment allocations	0	0	0	0	0	0	0	0	0
S8 – South West Rugby	0	0	0	0	0	0	0	0	0
S9 – South West Rugby spine road network	0	0	0	0	0	0	0	0	0
CL1 – Net zero buildings	+	+	+	+	+	+	+	+	+

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
CL2 – Renewable energy and low carbon technology	0	0	0	0	0	0	0	0	0
CL3 – Water supply, water quality and efficiency	0	0	0	0	0	0	0	0	0
CL4 – Climate adaptation	+	+	+	+	+	+	+	+	+
E1 – Employment land protection	0	0	0	0	0	0	0	0	0
E2 – employment development	0	0	0	0	0	0	0	0	0
E3 – rural economy	0	0	0	0	0	0	0	0	0
C1 – Rugby town centre	+	+	+	+	+	+	+	+	+
C2 – Main town centre uses	0	0	0	0	0	0	0	0	0
C3 – Local and district centres	0	0	0	0	0	0	0	0	0
C4 – Neighbourhood hubs	+	+	+	+	+	+	+	+	+
EN1 –	0	0	0	0	0	0	0	0	0

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
Biodiversity and geodiversity protection									
EN2 – Landscape protection	0	0	0	0	0	0	0	0	0
EN3 – Area of elevated landscape sensitivity	0	0	0	0	0	0	0	0	0
EN4 – Areas of separation	0	0	0	0	0	0	0	0	0
EN5 – Biodiversity net gain	+	+	+	+	+	+	+	+	+
EN6 – Canopy cover	+	+	+	+	+	+	+	+	+
EN7 – Flood risk	0	0	0	0	0	0	0	0	0
EN8 – Environmental protection and amenity	+	+	+	+	+	+	+	+	+
EN9 – Air quality	+	+	+	+	+	+	+	+	+
H1 – Housing mix	+	+	+	+	+	+	+	+	+
H2 – Affordable housing	+	+	+	+	+	+	+	+	+
H3 – Rural	0	0	0	0	0	0	0	0	0

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
worker dwellings									
H4 – Rural exception sites	0	0	0	0	0	0	0	0	0
H5 – replacement dwellings	0	0	0	0	0	0	0	0	0
H6 – Specialist housing	+	+	+	+	+	+	+	+	+
H7 – Housing standards	+	+	+	+	+	+	+	+	+
H8 – Houses in Multiple Occupation	+	+	+	+	+	+	+	+	+
W1 – Protection of community facilities	+	+	+	+	+	+	+	+	+
W2 – Open space and sports provision	+	+	+	+	+	+	+	+	+
D1 – Well designed places	+	+	+	+	+	+	+	+	+
D2 – Infill and householder development	0	0	0	0	0	0	0	0	0
D3 - Landscaping	0	0	0	0	0	0	0	0	0

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
D4 – Historic environment	0	0	0	0	0	0	0	0	0
D5 – Sustainable drainage	0	0	0	0	0	0	0	0	0
I1 - Transport	+	+	+	+	+	+	+	+	+
I2 - Parking	+	+	0	0	0	0	0	0	0
I3 – Communication infrastructure	0	0	0	0	0	0	0	0	0
I4 – Infrastructure and planning obligations	0	0	0	0	0	0	0	0	0
I5 – New railway stations	0	0	0	0	0	0	0	0	0

AGENDA MANAGEMENT SHEET

Report Title: Appointment of Interim Chief Officer for Finance & Performance (Statutory Section 151 Officer)

Name of Committee: Council

Date of Meeting: 15 July 2026

Report Director: Chief Executive

Portfolio: Finance and Performance, Legal and Governance

Ward Relevance: All wards

Prior Consultation: Leader of the Council and Group Leaders; the Monitoring Officer and the [outgoing / Deputy] Chief Financial Officer (statutory officer consultation).

Contact Officer: John Murphy, Monitoring Officer and Chief Officer for Legal and Governance

Public or Private: Public

Report Subject to Call-In: No

Report En-Bloc: No

Forward Plan: No

Corporate Priorities: This report relates to the following priority(ies):
☒ A Healthier Rugby – To support people to live healthier, longer, and more independent lives.
☒ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.
☒ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.
☒ A Fairer Rugby – To reduce inequalities and improve housing across the Borough.
[Corporate Strategy 2025-2035](#)
☐

Summary: The Council must at all times have a suitably qualified officer designated under section 151 of the Local Government Act 1972 as responsible for the proper administration of its financial affairs. Following the departure of Chief Officer for Finance

& Performance, this report asks Full Council to designate an interim Section 151 Officer to maintain continuity of the statutory finance function.

It is proposed that Mathew Crosby be designated to the role on an interim basis, by the route reserved to Full Council under Part 3H, paragraph 4(b) of the Constitution.

Financial Implications:

Pending recruitment of a permanent Section 151 Officer, the interim appointment is funded at an agreed daily rate as negotiated via an external recruitment agency.

Risk Management/Health and Safety Implications:

The principal risk is to the continuity of the statutory finance function; a gap in the Section 151 designation would breach the Council's statutory duty and weaken the section 114 safeguard. Approving the recommendations removes that risk.

Environmental Implications:

None arising directly from this report.

Legal Implications:

The appointment engages section 151 of the Local Government Act 1972, sections 113–114 of the Local Government Finance Act 1988, Part 3H of the Constitution and the Local Authorities (Standing Orders) (England) Regulations 2001. The route adopted is that for a Statutory Chief Officer under Part 3H, paragraph 4(b): Full Council may make the appointment provided no well-founded objection is made by any Cabinet member. Detail is at paragraphs 4–5 of the report.

Equality and Diversity:

No adverse equality implications are identified. The recruitment and declaration requirements in Part 3H, paragraph 2.1 of the Constitution apply.

Options:

(1) Designate Mathew Crosby as Interim Section 151 Officer (recommended) – maintains the statutory function without interruption.

(2) Do not appoint – not viable, as it would leave the Council without a designated Section 151 Officer, in breach of statutory duty.

Recommendation:

(a) that Mathew Crosby be appointed as the Interim Chief Officer for Finance & Performance, and be designated as the

Council's statutory Chief Finance Officer under section 151 of the Local Government Act 1972 and as the officer designated under section 114 of the Local Government Finance Act 1988, with effect from 17 July 2026 until either a permanent appointment or a period of up to 31 March 2028, whichever is the earlier;

- (b) that it be confirmed that, in accordance with Part 3H, paragraph 4(b) of the Constitution and the Local Authorities (Standing Orders) (England) Regulations 2001, the appointment is made on the basis that no well-founded objection to it has been made by any member of the Cabinet, the opportunity to raise any such objection having been given prior to the meeting;
- (c) that the Interim Chief Officer for Finance & Performance be authorised to exercise all the statutory functions, duties and delegated powers of the Chief Financial Officer / Section 151 Officer as set out in the Constitution, with immediate effect from the date in recommendation (a); and
- (d) that the consequential interim management arrangements and the Council's thanks to the outgoing postholder be noted.

**Reasons for
Recommendation:**

To ensure the Council continues to meet its statutory duty to have a suitably qualified, properly designated Section 151 Officer at all times, appointed by the constitutionally correct route, so that financial governance and the section 114 safeguard remain in place without interruption.

Council - 15 July 2026

**Appointment of Interim Chief Officer for Finance & Performance
(Statutory Section 151 Officer)**

Public Report of the Chief Executive

Recommendation

- (a)** that Mathew Crosby be appointed as the Interim Chief Officer for Finance & Performance, and be designated as the Council's statutory Chief Finance Officer under section 151 of the Local Government Act 1972 and as the officer designated under section 114 of the Local Government Finance Act 1988, with effect from 17 July 2026 until a permanent appointment or a period of up to 31 March 2026, whichever is the earlier;
- (b)** that it be confirmed that, in accordance with Part 3H, paragraph 4(b) of the Constitution and the Local Authorities (Standing Orders) (England) Regulations 2001, the appointment is made on the basis that no well-founded objection to it has been made by any member of the Cabinet, the opportunity to raise any such objection having been given prior to the meeting;
- (c)** that the Interim Chief Officer for Finance & Performance be authorised to exercise all the statutory functions, duties and delegated powers of the Chief Financial Officer / Section 151 Officer as set out in the Constitution, with immediate effect from the date in recommendation (a); and
- (d)** that the consequential interim management arrangements and the Council's thanks to the outgoing postholder be noted.

1. Purpose of the Report

- 1.1 This report asks Full Council to designate an interim statutory Section 151 Officer (Chief Finance Officer) following the departure of the former Section 151 Officer on Friday 3 July. The designation of the Section 151 Officer is reserved to Full Council, and this report ensures the Council continues to discharge its statutory duty to have a suitably qualified officer responsible for the proper administration of its financial affairs at all times.

2. Background

- 2.1 The Council must have, at all times, an officer designated as its Section 151 Officer. A gap in that designation would place the Council in breach of section 151 of the Local Government Act 1972 and would compromise the safeguards that depend on the post, including the section 114 reporting duty.
- 2.2 The substantive Chief Officer for Finance & Performance departed with effect on 3 July 2026. To maintain continuity pending, it is proposed that Mathew Crosby be designated on an interim basis.
- 2.3 This follows established sector practice. Comparable Full Council reports designating an interim Section 151 Officer include South Cambridgeshire District Council's "Report on Appointment of Interim Chief Finance (Section 151) Officer" (2025), and similar reports adopted by Somerset Council, Westmorland & Furness Council, the City of Wolverhampton Council and Bolton Council.

3. The Statutory Section 151 Role

- 3.1 Section 151 of the Local Government Act 1972 requires the Council to make arrangements for the proper administration of its financial affairs and to secure that one of its officers has responsibility for those affairs – the Chief Finance Officer, commonly the Section 151 Officer.
- 3.2 Section 113 of the Local Government Finance Act 1988 requires the postholder to be a member of a specified professional accountancy body (for example CIPFA, ICAEW. Mathew Crosby is a qualified accountant with many years' experience as the Chief Financial Officer/Section 151 Officer in other local authorities.
- 3.3 Under section 114 of the Local Government Finance Act 1988 the Section 151 Officer has a personal duty, after consulting the Head of Paid Service and the Monitoring Officer, to report unlawful expenditure or an unbalanced budget. These duties are reflected in Part 1B (Articles 12–13) and in the Financial Standing Orders at Part 3G, paragraphs 2.2 and 4.4.

4. Constitutional and Legal Framework for the Appointment

- 4.1 The Section 151 Officer is a "Statutory Chief Officer" as defined in Part 3H, paragraph 1 of the Constitution. The appointment route is set out in Part 3H,

paragraph 4 and in the Local Authorities (Standing Orders) (England) Regulations 2001 (as amended).

- 4.2 Part 3H, paragraph 4(b) provides that the Council may only make or approve the appointment of a Statutory Chief Officer where no well-founded objection has been made by any member of the Cabinet. That is the operative requirement here.
- 4.3 For completeness, the committee-recommendation requirement in Part 3H, paragraph 4(a) (an appointment recommended by a committee including at least one Cabinet member) applies in terms only to the Chief Executive and Head of Paid Service. The Chief Finance Officer appointment is governed by paragraph 4(b). The mechanism for giving Cabinet members the opportunity to raise any well-founded objection should be confirmed before, or at, the meeting (see recommendation (b)).
- 4.4 As the designation is a function reserved to Full Council and is not an executive function, it is not a key decision and does not engage the Forward Plan, call-in or any Cabinet route.

5. The Proposed Interim Arrangement

- 5.1 It is proposed that Mathew Crosby be designated as Interim Chief Officer for Finance & Performance and Section 151 Officer with effect from 15 July 2026 until a permanent appointment is made and be empowered to exercise the full statutory functions and delegations of the Chief Financial Officer set out in the Constitution.

6. Consequential Management Arrangements

- 6.1 Mathew Crosby will assume all the existing management arrangements for the Section 151 Officer.

7. Implications

- 7.1 The financial, legal, risk and equality implications are set out in the Agenda Management Sheet above. Designating a suitably qualified Section 151 Officer ensures the Council meets its statutory duties; failure to maintain the designation would place the Council in breach of statutory duty.

8. Conclusion

- 8.1 Designating Mathew Crosby as Interim Chief Officer for Finance & Performance and Section 151 Officer ensures continuity of the Council's statutory financial responsibilities, through a suitably qualified officer, by the constitutionally correct route. Council is recommended to approve the recommendations above.

Name of Meeting: Council

Date of Meeting: 15 July 2026

Subject Matter: Appointment of Interim Chief Officer for Finance & Performance (Statutory Section 151 Officer)

Originating Department: Chief Executive Office

DO ANY BACKGROUND PAPERS APPLY

☒ **YES**

☐ **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
1	Rugby Borough Council Constitution (Parts 1B, 3F, 3G and 3H)
2	Local Government Act 1972, s.151; Local Government Finance Act 1988, ss.113–114; Local Authorities (Standing Orders) (England) Regulations 2001

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

AGENDA MANAGEMENT SHEET

Report Title:	Decision taken in exceptional circumstances
Name of Committee:	Council
Date of Meeting:	15 July 2026
Report Director:	Monitoring Officer
Portfolio:	People, Resources and Governance
Ward Relevance:	All
Prior Consultation:	Leader of the Council, the Portfolio Holder for Finance and Performance, Legal and Governance, the Main Opposition Group Leader, and the Chair of Scrutiny Committee
Contact Officer:	Linn Ashmore, Democratic Services Officer linn.ashmore@rugby.gov.uk
Public or Private:	Public
Report Subject to Call-In:	No
Report En-Bloc:	No
Key Decision:	No
Corporate Priorities:	This report relates to the following priority(ies): ☐ A Healthier Rugby – To support people to live healthier, longer, and more independent lives. ☐ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre. ☐ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change. ☐ A Fairer Rugby – To reduce inequalities and improve housing across the Borough. Corporate Strategy 2025-2035 ☒ This report does not specifically relate to any Council priorities but in accordance with the Council's Constitution, details items taken as a matter of urgency.
Summary:	An item was taken as an urgent matter in accordance with the Council's Constitution.

Local Government Reorganisation Implications:	The local government reorganisation implications are detailed at appendix 1.
Financial Implications:	The financial implications are detailed at appendix 1.
Risk Management/Health and Safety Implications:	The risk management/health and safety implications are detailed at appendix 1.
Environmental Implications:	The environmental implications are detailed at appendix 1.
Legal Implications:	The legal implications are detailed at appendix 1.
Equality and Diversity:	The equality and diversity implications are detailed at appendix 1.
Options:	N/A
Recommendation:	The report be noted.
Reasons for Recommendation:	To comply with the Council's Constitution.

Council - 15 July 2026

Decision taken in exceptional circumstances

Public Report of the Monitoring Officer

Recommendation

The report be noted.

1. EXECUTIVE SUMMARY

1.1. This report provides details of an item taken as an urgent matter in exceptional circumstances.

2. EMERGENCY DECISION UNDER DELEGATED POWERS – AMENDMENTS TO 2026/27 FEES AND CHARGES SCHEDULE

2.1. In accordance with Part 2B of the Council's Constitution, an item was determined using the Council's emergency decision procedure under delegated powers relating to amendments to the 2026/27 Fees and Charges Schedule.

2.2. This item was determined under emergency powers due to the Fees and Charges schedule starting from 1 April 2026.

2.3. A copy of the report is attached at Appendix 1.

2.4. Consultation was taken with the Leader of the Council, the Portfolio Holder for Finance and Performance, Legal and Governance, the Main Opposition Group Leader, and the Chair of Scrutiny Committee who agreed that –

- 1) To approve the fee amendments as detailed in Section 3 of the report;
- 2) To approve the new fees stated in Section 4 of the report and to allow for these fees to be added to the 2026/27 fees and charges schedule; and
- 3) To approve the description amendments stated in Section 5 of the report.

Name of Meeting: Council

Date of Meeting: 15 July 2026

Subject Matter: Decision taken in exceptional circumstances

Originating Department: Legal and Governance

DO ANY BACKGROUND PAPERS APPLY ☐ YES ☒ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Agenda No***AGENDA MANAGEMENT SHEET***

Report Title:	Amendments to 2026-27 Fees and Charges Schedule
Name of Committee:	Council
Date of Meeting:	31 March 2026
Report Director:	Chief Financial Officer
Portfolio:	Finance and Performance, Legal and Governance
Ward Relevance:	All Wards
Prior Consultation:	
Contact Officer:	Gemma Lister, Lead Accountant gemma.lister@rugby.gov.uk
Public or Private:	Public
Report Subject to Call-In:	No
Report En-Bloc:	No
Key Decision:	No
Corporate Priorities:	This report relates to the following priority(ies): ☐ A Healthier Rugby – To support people to live healthier, longer, and more independent lives. ☐ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre. ☐ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change. ☐ A Fairer Rugby – To reduce inequalities and improve housing across the Borough. Corporate Strategy 2025-2035 ☒ This report does not specifically relate to any Council priorities but the Fees and Charges schedule allows the organisation to deliver all the priorities in the strategy.
Summary:	To make amendments to the Fees and Charges schedule for 2026/27.
Local Government Reorganisation Implications:	There are no implications.

Financial Implications:	Detailed in the body of the report.
Risk Management/Health and Safety Implications:	There are no implications.
Environmental Implications:	There are no implications.
Legal Implications:	Increasing revenue and introducing new Legal Services Fees.
Equality and Diversity:	There are no implications.
Options:	To approve or reject the fee changes detailed in Sections 3-5 of the report.
Recommendation:	1. To approve the fee amendments as detailed in Section 3 of the report. 2. To approve the new fees stated in Section 4 of the report and to allow for these fees to be added to the 2026/27 fees and charges schedule. 3. To approve the description amendments stated in Section 5 of the report.
Reasons for Recommendation:	To ensure the correct fees are charged as approved by Service Managers and Chief Officers at the time of budget setting and to enable us to charge for additional services, increasing income for the organisation as detailed in Section 4 of the report.

Agenda No

Council - 31 March 2026

Amendments to 2026-27 Fees and Charges Schedule

Public Report of the Chief Financial Officer

Recommendation

1. To approve the fee amendments as detailed in Section 3 of the report.
2. To approve the new fees stated in Section 4 of the report and to allow for these fees to be added to the 2026/27 fees and charges schedule.
3. To approve the description amendments stated in Section 5 of the report.

1. Executive Summary

- 1.1. This report outlines amendments to the approved 2026/27 Fees and Charges Schedule, following the identification of discrepancies between the version agreed at Council on 18 February 2026 and the fees published during Scrutiny Committee on 15 January 2026.
- 1.2. Whilst most fees were intended to increase by 3.8% in line with the Medium Term Financial Strategy (reflecting CPI for September 2025), some rounding adjustments were omitted in the final published schedule.
- 1.3. A number of new fees for 2026/27 also need to be added, reflecting new activities that will generate additional income.
- 1.4. Approval of these updates will ensure all services can charge the correct fees as intended and maximise income for the Council.

2. Background

- 2.1. The 2026/27 Fees and Charges Schedule was approved at Council held on 18 February 2026. Appendix 1 details the fees and charges which were approved during that meeting.
- 2.2. The report stated that in line with the Medium Term Financial Strategy (MTFS) policy, most fees and charges will be increasing by 3.8%, reflecting CPI for September 2025. Exceptions include:
 - Areas set nationally by statute
 - Commercially sensitive services such as Trade Waste

- Frozen fees including Garden Waste subscriptions and Car Parking

2.3. There was a version of the Fees and Charges which was submitted to Scrutiny Committee on the 15 January 2026 which included the fees and charges split into 3 categories:

- Those increasing by 3.8% or more
- Those not increasing
- Fees which are set nationally by statute so would not be increasing

2.4. After this scrutiny report, the final version of the Fees and Charges was created to be published as part of the final Council Tax Setting Report for the General Fund. When transferring fees across to the final version, those which were increased by 3.8% were transferred across however a few of the fees had been rounded by Service Manager's and this had been missed on the final version.

2.5. There are some fees which need to be added to the schedule as they are new for 2026/27 and have not been charged before. These are detailed in Section 4 of this report.

3. Fee amendments

3.1. The fees detailed in the table below are to be amended. The table details what has been approved and is currently published on the Rugby Borough Council website followed by the corrected fee.

Portfolio	Fee Description	2026/27 current fee £	CORRECTED fee £
Growth and Investment	Planning Application printing:		
	• Size A3 • Size A4	1.20 1.20	1.25 1.25
	Miscellaneous Documentation:		
	• First copy from each file • Subsequent copies (black and white) per side • Subsequent copies (colour) per side	1.20 0.12 0.23	1.25 0.15 0.25
	Section 106 Agreements and unilateral undertakings:		
	• For any obligation related to Affordable Housing which contains eligibility criteria • for each obligation which only seeks a monetary contribution	622.80 622.80	625.00 625.00

	Additional monitoring fees for Section 106 Agreements, Unilateral Undertakings and Conditions:		
	• Site inspection fee	249.10	250.00
	• Approval of details/documents, including conditions per submission/compliance request	373.70	375.00
	• Deed of variation per s106/UU topic	737.00	740.00
	• Monitoring in relation to discounted market affordable housing dwellings (per dwelling)	519.00	520.00
	Confirmation Planning Enforcement Notice of other such formal enforcement matter has been complied with or request to be withdrawn (per notice/matter) from a property/site and/or Land Charges Register	259.50	260.00
	Land Charges:		
	Additional questions each	47.60	47.70
	Con29 – residential	135.50	135.60
	Con29 – commercial	135.50	155.70
	Con29 O – Optional Enquiries, except ones listed below	22.70	22.80
	Other Con29 questions:		
	• Question 3.11	20.60	20.70
	• Questions 3.13	2.20	2.10

4. New Fees

4.1. The fees detailed in the table below are to be added to the Fees and Charges schedule. The Legal and Governance fees reflect a service which previously the Council has not undertaken and will increase revenues for the Council.

Portfolio	Fee Description	New Fee to be added to the schedule £
Growth and Investment	Environmental Information Regulations 2004 (as amended) request (Part 2, Regulation 8) (excluding Planning CON29 requests) <i>Flat rate figure as advised by the Information Commissioner's Office</i>	25.00
	Rugby Outdoor Market	
	Electricity (per day):	6.60

	• 13amp plug • 16amp plus	9.24
Legal and Governance	S106 Agreements: • Minor (1-2 obligations) • Major (3+ obligations) • Complex matters This includes major developments, multiple planning obligations/multiple land interests and trigger payments. Any additional work required up to completion will continue at an hourly rate of £265	1,647.00 2,983.00 Up to 2,983
	S106 deed of variations	1,647
	S106 unilateral undertakings	1,647

5. Fee description changes

5.1. The table below is requesting the following fees to have the descriptions amended. The changes have been highlighted to indicate the changes that need to be made.

Portfolio	2026/27 Current Description	CORRECTED description
Growth and Investment	Confirmation Planning Enforcement Notice or other such formal enforcement matter has been complied with or request to be withdrawn (per notice/matter) from a property/site	Confirmation Planning Enforcement Notice or other such formal enforcement matter has been complied with or request to be withdrawn (per notice/matter) from a property/site and/or Land Charges Register
	From 1st April 2015 regulatory activities will be undertaken by Warwick District Council as a shared partnership. Please visit www.warwickdc.gov.uk for further information.	Building Control (Title to be added to this section of the schedule) From 1st April 2015 regulatory activities will be undertaken by Warwick District Council as a shared partnership. Please visit www.warwickdc.gov.uk for further information.

6. Conclusion

- 6.1. Since Council on 18 February, discrepancies have been identified between the published fees, and the fees Services were expecting to charge.
- 6.2. The errors related primarily to rounding adjustments and the omission of new fees.
- 6.3. If the recommendations are approved, Services can start to charge for fees which are not currently mentioned on the schedule and fees will be charged correctly as per the fees requested by the Service Managers during the Budget Setting process.
- 6.4. Appendix 2 shows the revised Fees and Charges schedule with the amendments highlighted in yellow.

Name of Meeting: Council

Date of Meeting: 31 March 2026

Subject Matter: Amendments to the 2026-27 Fees and Charges Schedule

Originating Department: Finance and Performance

DO ANY BACKGROUND PAPERS APPLY ☐ YES ☒ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Leisure and Wellbeing			
Rugby Art Gallery and Museum			
Floor One Gallery artist exhibition hire 2 weeks	155.10	161.00	3.80%
Public Liability Insurance administration fee (Floor One Gallery)	33.00	34.30	3.94%
Children's workshops - 2 hours	12.70	13.20	3.94%
Children's workshops - 10 - 4	31.70	32.90	3.79%
Baby Splats	6.90	7.00	1.45%
Tripointium - Roman Britain school workshop	126.70	150.00	18.39%
Roman Day	272.50	285.00	4.59%
Arts Award 'Discover in a Day' school session per child	8.70	9.00	3.45%
Sketch book journey school workshop	126.70	150.00	18.39%
Historic loans box hire	8.70	9.00	3.45%
Magic Carpet	145.70	150.00	2.95%
Draw, Draw, Draw	126.70	150.00	18.39%
Rugby Collection	120.40	125.00	3.82%
Archaeological archive deposits, per box:			
Large box - £330.30 (up to 255mm x 405mm x 225mm)	330.30	330.30	0.00%
Small box - £165.15 (up to 268mm x 405mm x 80mm)	165.15	165.15	0.00%
Centre supervisor to stay after hours (hourly rate)	52.80	54.80	3.79%
Gallery Assistant (per hour)	39.50	41.00	3.80%
<u>Education Room 1 - hire charges</u>			
Per hour	29.80	30.90	3.69%
National Charities/Education	23.90	24.80	3.77%
Local Groups/Charities/Education	20.80	21.60	3.85%
<u>Education Room 2 - hire charges</u>			
Per hour	21.10	21.90	3.79%
National Charities/Education	16.90	17.50	3.55%
Local Groups/Charities/Education	14.60	15.20	4.11%
<u>Note: Room Hire</u>			
FULL day room hire offers a 5% discount			
Refreshments can be provided at an additional cost please contact service directly for details			
Rugby Open fee - single artwork	8.40	8.70	3.57%
Rugby Open fee - three artworks	22.10	22.90	3.62%
Rugby Open late collection of artwork fee (per artwork per day)	6.10	6.30	3.28%
Rugby Open commission on artwork sales	25% commission	25% commission	
Benn Hall			
<u>Monday - Thursday per hour</u>			
Main Hall	45.00	60.00	33.33%
Rokeby Room	30.00	40.00	33.33%
Bar	25.00	30.00	20.00%
Whole Building	75.00	100.00	33.33%
<u>Friday 9-5 per hour</u>			
Main Hall	75.00	75.00	0.00%
Rokeby Room	50.00	50.00	0.00%
Bar	25.00	25.00	0.00%
Whole Building	125.00	125.00	0.00%
<u>Friday from 5pm, Saturday, Sunday & Bank Holidays per hour</u>			
Whole Building	125.00	125.00	0.00%
<u>Use of Kitchen Facilities for the provision of:-</u>			
Tea/Coffee/Squash/Biscuits	45.00	45.00	0.00%
All other catering per hour	30.00	30.00	0.00%
<u>Show Packages</u>			
Monday - Wednesday	520.00	820.00	57.69%
Thursday to Sunday	820.00	1020.00	24.39%
<u>NOTE:</u>			
(a) Preparation time, if required, must be arranged at time of booking. Please note this cannot always be guaranteed.			
(b) Christmas Eve, New Year's Eve and New Year's Day will be charged at weekend rate.			
Sports and Recreation			
Use of Community Sports Coach	21.30	21.30	0.00%
Use of a Play Ranger	21.30	21.30	0.00%
<u>Use of On Track Sports Leaders</u>			
Schools (PPA/Lunch)	21.30	22.10	3.76%
Sport Specific	25.80	26.80	3.88%
Mentoring	25.80	26.80	3.88%
Small Group Work	38.70	40.20	3.88%
Youth Club	21.80	22.60	3.67%
Sport Leader Courses	38.70	40.20	3.88%
Boxing Leader Courses	38.70	40.20	3.88%

Fees and Charges Schedule 2026-27					
	Current Fee 2025/26		PROPOSED Fee 2026/27		% increase
Parks and Open Spaces					
Caldecott Park - to be fixed with the café leaseholder					
Special Events on Parks and Open Spaces					
Sports Tournaments	price on application		price on application		
Charitable Events	no charge		no charge		
Dog Shows - per opening day	372.70		386.90		3.81%
Fairs/Circuses - per operating day	494.60		513.40		3.80%
Fairs/Circuses - per setting up day	141.00		146.40		3.83%
Returnable deposit for new fair/circus operator	390.60		405.40		3.79%
Commercial Events	497.00		515.90		3.80%
Filming rights (per day)	264.00		274.00		3.79%
Ice Cream Licence	price on application		price on application		
NOTE: SPORTS PITCHES ARE HIRED PER SESSION (not including time spent changing)					
All hirers must provide evidence of Public Liability insurance of £5 million					
and sign the current Terms and Condition of Hire					
Matches must be completed by 9pm Monday to Saturday and by 6pm on Sunday					
Rugby Football: 1 session is deemed to last up to 100 minutes					
Football: 1 session is deemed to last up to 120 minutes					
Cricket: 1 session is deemed to last up to 4 hours					
Changing Facilities: where booked will be charged per pitch session as above					
This is an unattended service provided to specific clubs/teams by prior agreement.					
An attended service is available for a casual booking - additional charge payable					
Where an all day booking is made, morning is deemed to be one session, afternoon one session and evening one session. Each session will be charged as detailed.					
Senior pitch hire					
Football, Rugby, Cricket, Gaelic Football (Block Booking, sports teams or coaches)	Single Booking	Block Booking	Single Booking	Block Booking	
	45.80	39.90	47.54	41.42	3.80%
Football, Rugby, Cricket, Gaelic Football (Single Booking)	54.96	39.90	57.05	41.42	3.80%
Intermediate pitch hire					
Football (Block Booking, sports teams or coaches)	35.70	31.70	37.06	32.90	3.80%
Football, Rugby, Cricket, Gaelic Football (Single Booking)	42.84	31.70	44.47	32.90	3.80%
Junior pitch hire					
Football, Rugby (Block Booking, sports teams or coaches)	35.70	31.70	37.06	32.90	3.80%
Football, Rugby, Cricket, Gaelic Football (Single Booking)	42.84	31.70	44.47	32.90	3.80%
Mini pitch hire					
Football (Block Booking, sports teams or coaches)	17.90	15.30	18.58	15.88	3.80%
Football, Rugby, Cricket, Gaelic Football (Single Booking)	21.48	15.30	22.30	15.88	3.80%
UNAUTHORISED USE OF FACILITIES - DOUBLE FEE PAYABLE					
Training (per training session) (Block Booking, sports teams or coaches)	12.30	12.90	12.77	13.39	3.80%
Training (per training session) (Single Booking)	14.76	12.90	15.32	13.39	3.80%
Changing Rooms (subject to change as facilities are refurbished)					
Charged per session as above. Changing rooms are opened as for Football/Cricket, 30 minutes before kick-off, Rugby/Gaelic 60 minutes before kick-off and early opening - price on application.					
Unattended regular use through the season on specified number of occasions (minimum 10)					
Seniors per room per occasion (no refunds unless cancelled by Council)	22.70		23.60		3.96%
Juniors per room per occasion (no refunds unless cancelled by Council)	15.60		16.20		3.85%
Juniors					
Weekly access to toilets only (For season- dates as agreed)	310.70		322.50		3.80%
Unattended casual use (less than 10 occasions)					
Seniors £18.00 per room per occasion	27.50		28.50		3.64%
Juniors £12.50 per room per occasion	19.10		19.80		3.66%
Additional £25 payable					
Attended Service					
Late Booking Charges					
Each Pitch (Including VAT)	13.10		13.60		3.82%
Changing room(s) (plus VAT as appropriate)	13.10		13.60		3.82%
Professional Trainers (per hour)	17.90		18.60		3.91%
Growth and Investment					
Planning Services					
Pre-application Charges					
Householder Extensions or Outbuildings	110.00		115.00		4.55%
Other Commercial Development					
1-4 Dwellings, Agriculture, Change of Use or other Minor Development Proposals	470.00		490.00		4.26%
Additional Meeting or Advice Notice in regard to above	145.00		150.00		3.45%
5-9 Dwellings; or any development with 500m2 to 999m2 of Floor Space	1,260.00		1,310.00		3.97%
Additional Meeting or Advice Notice in regard to above	145.00		150.00		3.45%
10 to 49 dwellings; or any development up to 0.49; or 1,000 to 4,999 m2 of floor space	2,870.00		2,980.00		3.83%
Additional Meeting or Advice Notice in regard to above	600.00		625.00		4.17%
50 to 99 dwellings; or development 0.5 to 0.99ha or 5,000 to 9,999 m2 of floor space	4,420.90		4,590.00		3.83%
Additional Meeting or Advice Notice in regard to above	600.00		625.00		4.17%
100-199 Dwellings or development 1ha to 2ha	Price on application		Price on application		
Additional Meeting or Advice Notice in regard to above	Price on application		Price on application		

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
200+ Dwellings; or development greater than 2 ha; or gross floor area greater than 10,000m2	Price on application	Price on application	
Additional Meeting or Advice Notice in regard to above	Price on application	Price on application	
<u>Planning Performance Agreements</u>			
Major strategic developments where a Planning Performance Agreement (PPA) is required: to be negotiated	price on application	price on application	
Planning Application Fees - set nationally			
A Guide to the Fees for Planning Applications in England			
Available on line via national Planning Portal website			
<u>Plan Printing – Size A0 + (per copy)</u>	10.70	11.10	3.74%
Size A0	7.90	8.20	3.80%
Size A1	5.40	5.60	3.70%
Size A2	2.50	2.60	4.00%
Size A3	1.20	1.20	0.00%
Size A4	1.20	1.20	0.00%
<u>Planning Decision Notices (including appeal decisions)</u>			
Per copy	20.00	20.80	4.00%
<u>Miscellaneous Documentation</u>			
First copy from each file	1.20	1.20	0.00%
Subsequent copies (black and white) per side	0.11	0.12	9.09%
Subsequent copies (colour) per side	0.22	0.23	4.55%
<u>Section 106 Agreements & Unilateral Undertakings</u>			
For any obligation related to Affordable Housing which contains eligibility criteria	600.00	622.80	3.80%
For each obligation which only seeks a monetary contribution	600.00	622.80	3.80%
5% of the total financial contribution per obligation where additional ongoing monitoring is required over and above just a monetary contribution			
Any large scale developments (such as 350 dwellings or more, or 15,000 square metres gross or more, including Sustainable Urban Extensions, will be subject to bespoke monitoring fee arrangements			
<u>Additional monitoring fees for Section 106 Agreements, Unilateral Undertakings and Conditions</u>			
Site inspection fee	240.00	249.10	3.79%
Approval of details/documents, including conditions per submission/compliance request	360.00	373.70	3.81%
Deed of variation per s106/ UU topic	710.00	737.00	3.80%
Monitoring in relation to discounted market affordable housing dwellings (per dwelling)	500.00	519.00	3.80%
Confirmation Planning Enforcement Notice or other such formal enforcement matter has been complied with or request to be withdrawn (per notice/matter) from a property/site	250.00	259.50	3.80%
<u>Biodiversity net gain (BNG)</u>			
Biodiversity net gain (BNG) monitoring for all new applicable development sites in relation to onsite and offsite BNG and Habitat Banks	price on application dependent on size of site	price on application dependent on size of site	
From 1st April 2015 regulatory activities will be undertaken by Warwick District Council as a shared partnership. Please visit www.warwickdc.gov.uk for further information.			
Land Charges			
Additional Questions each	45.90	47.60	3.70%
Additional Parcels each	23.10	24.00	3.90%
Con29 - Residential	130.50	135.50	3.83%
Con29 - Commercial ((to split out from above, so new fee for 26/27))	130.50	135.50	3.83%
Con29 O - Optional Enquiries, except ones listed below	21.90	22.70	3.65%
Con29 O - Optional Enquiry 22	23.40	24.30	3.85%
*We DO NOT answer Questions 4 & 16			
<u>Other CON29 questions</u>			
Question 1.1 j, k, l	21.00	21.80	3.81%
Question 2	41.10	42.70	3.89%
Question 3.7	18.30	19.00	3.83%
Question 3.8	6.30	6.50	3.17%
Question 3.9	6.60	6.90	4.55%
Question 3.11	19.80	20.60	4.04%
Question 3.13	2.10	2.20	4.76%
Environmental Information Regulations 2004 (as amended) request (Part 2, Regulation 8) (excluding Planning CON29 requests)	0.00	0.00	0.00%
Rugby Outdoor Market			
Rugby Market Daily Pitch Fee (payable to CJ Events)	28.00	28.00	0.00%
Street name and numbering			
Add a name to an existing address - Price per address	31.70	32.90	3.79%
Change an existing address - Price per address	31.70	32.90	3.79%
Register a new address - Price per address	31.70	32.90	3.79%
New Addresses on Large Developments - Price per 2 - 5 plots	126.70	131.50	3.79%
New Addresses on Large Developments - Price per 6 - 10 plots	253.50	263.10	3.79%
New Addresses on Large Developments - Price per 11 - 19 plots	380.20	394.60	3.79%
New Addresses on Large Developments - Price per 20+ plots	507.00	526.30	3.81%
New Addresses on Large Developments - Price per additional plot over 20 plots	19.00	19.70	3.68%
Register a new Street - Price per street	126.70	131.50	3.79%
Rename an existing street - Price per street	253.50	263.10	3.79%
+ a per address charge - Price per address	31.70	32.90	3.79%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Regulation and Safety			
Bereavement Services - Crematorium			
<i>Note: Adult rates apply to persons aged 18 or over</i>			
Cremation Fees -inclusive of medical referee fees, unwitnessed scattering of ashes and environmental levy (where applicable)			
Child - up to 24 weeks gestation	no charge	no charge	
Child - from 24 weeks gestation up to and including 17 years of age (N.B. this is not to be paid by the family but will be claimed from the Children's Funeral Fund by RBC)	310.00	322.00	3.87%
Adult - service 10.00am - 4pm (45 mins max chapel time, to include entry and exit of chapel)	1,050.00	1,160.00	10.48%
Adult - service 9.00am (45 mins max chapel time, to include entry and exit of chapel)		1,060.00	
Adult - no service 8.15am - 8.25am (no music, minister or family present)	610.00	610.00	0.00%
Adult- no service with attendance 8.30am to 9am (max 25 people, 10 mins chapel time)	660.00	660.00	0.00%
Cremation of body parts (if we did not cremate deceased)	243.00	252.00	3.70%
Cremation of body parts (if we cremated deceased)	110.00	115.00	4.55%
Use of Ceremony Room (No Cremation)	360.00	374.00	3.89%
Extended Chapel Time - Booked In advance (Additional 45mins)		360.00	
Extended Chapel Time - Not booked in advance		450.00	
Weekend Surcharge			
Saturday cremation 10.00am - 12 noon - strict rotation	770.00	800.00	3.90%
Saturday interment of cremated remains (am only)	325.00	340.00	4.62%
Saturday scattering of cremated remains (am only)	130.00	135.00	3.85%
Scattering of ashes when cremation has taken place at Rainsbrook	55.00	58.00	5.45%
Scattering of ashes when cremation has taken place elsewhere	108.00	113.00	4.63%
Wooden casket/biodegradable casket	From £80	From £90	
Additional Biobox	16.00	17.00	6.25%
Forwarding cremated remains by post (inland)	price on application	price on application	
DVD recording of service	80.00	85.00	6.25%
Download link (Add on)	30.00	35.00	16.67%
Download link (stand alone)	60.00	65.00	8.33%
Music tribute up to 25 photographs timed to your chosen piece of music	95.00	100.00	5.26%
Music tribute up to 50 photographs timed to your chosen piece of music	125.00	135.00	8.00%
Basic slideshow (up to 25 photographs played on a loop throughout the service – cannot be timed to music)	65.00	70.00	7.69%
Themed tribute up to 25 photographs timed to your chosen piece of music	120.00	130.00	8.33%
Themed tribute up to 50 photographs timed to your chosen piece of music	150.00	160.00	6.67%
Virtual Memorial Service (for unattended services)	60.00	83.00	38.33%
Single photograph displayed	10.00	12.00	20.00%
Family Supported Tribute	40.00	42.00	5.00%
Bespoke tributes	price on application	price on application	
Webcast	95.00	100.00	5.26%
Administration fee (for additional work/non compliance) (For Clarification please call the office)	From £50	From £55	
Bearer's fee (advance booking only)	40.00	40.00	0.00%
Late arrival / overrun per 15 minutes past the booked time)	360.00	375.00	4.17%
Late cancellation	115.00	120.00	4.35%
Retention of ashes (per month, after first three months)	27.00	30.00	11.11%
Duplicate Cremation certificate	16.00	17.00	6.25%
Family history search	55.00	57.00	3.64%
Corporate Events		price on application	
Memorial Items			
Book of Remembrance			
Two line entry	100.00	105.00	5.00%
Five line entry	160.00	168.00	5.00%
Five line entry with emblem	220.00	230.00	4.55%
Eight line entry	240.00	250.00	4.17%
Eight line entry with emblem	280.00	290.00	3.57%
Memorial Tree (Bronze Plaque only, 10 year lease)	600.00	650.00	8.33%
Memorial Barbican Plaque (5 year lease)	550.00	570.00	3.64%
Memorial Bench (Bronze Plaque only, 10 year lease)	600.00	650.00	8.33%
Granite Memorial Package (50 year lease, inclusive price)	From £2,750	From £2,850	
Memorial Kerb (10 year lease)	800.00	830.00	3.75%
Tree of Life (10 year lease)	650.00	675.00	3.85%
Memorial Boulder (10 year lease)	800.00	830.00	3.75%
Armed Forces Plaque	700.00	730.00	4.29%
Bespoke Memorial	Prices from 150.00	Prices from 150.00	
Reservation fee: Granite Memorial Annual Charge for Space only	130.00	150.00	15.38%
Bereavement Services - Cemeteries			
Croop Hill Cemetery, Whinfield Cemetery, Watts Lane Cemetery, Clifton Road Cemetery			
Burial Charges			
Non-residents of Rugby are subject to triple fees in respect of Exclusive Right of Burial and Interment fees			
Purchase of Exclusive Right of Burial for 50 years			
Adult's Plot	2,100.00	2,200.00	4.76%
Adult Plot - Reservation Fee	n/a		
Adult's Plot - Watts Lane Green Burial area (single depth only)	2,100.00	2,200.00	4.76%
Adult Plot - Reservation Fee	n/a		
Interment fees - preparation and backfilling of grave			
Children - up to 24 weeks gestation - private arrangement	From no charge to 150.00	From no charge to 150.00	
Children - up to 24 weeks gestation - shared grave	150.00	156.00	4.00%
Children -from 24 weeks gestation up to 17 yrs (N.B. this is not to be paid by the family but will be claimed from the Children's Funeral Fund) – all areas including Cloverleaf Memorial Garden	450.00	470.00	4.44%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Adult grave	1,050.00	1,090.00	3.81%
Stepped single grave - for burial without coffin	1,100.00	1,150.00	4.55%
Weekend surcharge - Saturday 9.30am to 12.00 noon (when agreed)	785.00	815.00	3.82%
Construction of vault	price on application	price on application	
Interment of Cremated Remains in a Cemetery			
Purchase of Exclusive Right of Burial for 50 yrs			
Cremation plot for 2 caskets (most plots are this size)	800.00	830.00	3.75%
Cremation plot for 4 caskets (Croop Hill Cemetery)	950.00	986.00	3.79%
Reservation Fee - ashes plot	450.00	470.00	4.44%
Interment fees (ashes)- preparation and backfilling of grave			
Children -from 24 weeks gestation up to 17 yrs (N.B. this is not to be paid by the family but will be claimed from the Children's Funeral Fund)		470.00	
Adult - interment of cremated remains	450.00	470.00	4.44%
Adult - strewing of cremated remains under turf	250.00	260.00	4.00%
Scattering of ashes on the surface is not permitted			
Use of Cemetery Chapel at Watts Lane or Croop Hill Cemeteries	250.00	260.00	4.00%
On site appointment at cemeteries	50.00	52.00	4.00%
Use of Rainsbrook Ceremony Room (no cremation)	360.00	374.00	3.89%
Cemetery Memorial Tree with bronze plaque (10 year lease)	600.00	650.00	8.33%
Cemetery Memorial Bench			
Family History Search - Detailed genealogy research	56.00	58.00	3.57%
Exhumation			
Plaque on Whinfield Memorial Scrolls	300.00	350.00	16.67%
Plaque on Watts Lane Memorial Book	300.00	350.00	16.67%
Plaque on Child in Hand Memorial at Clifton Road	300.00	350.00	16.67%
Transfer of ownership of reserved grave to non resident (2 x EROB charge)	4,200.00	4,400.00	4.76%
Transfer of ownership	100.00	105.00	5.00%
Administration charge	From £50	From £55	
Memorial Permit Fees			
Main Cemetery Areas (purchased graves only)			
Headstone (including any base slab)			
Up to 5'6" high x 3'0" wide x 1'6" deep for Whinfield Cemetery, Watts Lane, Croop Hill and Clifton Road - Rainsbrook Cemetery up to 3ft tall	350.00		
		365.00	4.29%
Vase			
Up to 1'3" high and 1'0" diameter	200.00	208.00	4.00%
Plaque/tablet - Main Cemetery Section			
Up to 2'0" (h) x 2'6" (w) x 1'6" (d)	200.00	208.00	4.00%
Plaque/tablet - Whinfield Cremation Section			
Up to 2'0" (h) x 2'0" (w) x 2'0" (d)	200.00	207.60	3.80%
Plaque/tablet - Watts Lane Cremation Section			
Up to 2'0" (h) x 2'3" (w) x 2'0" (d)	200.00	208.00	4.00%
Plaque/tablet - Croop Hill Cremation Section			
Up to 1'6" (h) x 1'6" (w) x 3'0" (d)	200.00	208.00	4.00%
Added inscription to any memorial	200.00	208.00	4.00%
Replacement of existing memorial where no amendment to previous approval	50.00	52.00	4.00%
Kerbstones including headstone (where permitted)	600.00	623.00	3.83%
Kerbstones only (where permitted)	400.00	415.00	3.75%
Oversized headstone	5,000.00	5,190.00	3.80%
Cloverleaf Memorial Garden			
Contact Bereavement Services 01788 533715			
Regulatory Services			
Domestic Pest Control			
Rats - up to 3 visits	65.80	67.80	3.04%
Mice - up to 3 visits	113.40	116.40	2.65%
Bedbugs - up to 2 visits	152.50	157.00	2.95%
Fleas - up to 2 visits	125.30	128.80	2.79%
Cockroaches - up to 3 visits	152.50	157.00	2.95%
Squirrels- up to 3 visits	109.10	112.10	2.75%
Wasps and Hornets - up to 2 visits			
General charge	96.10	96.10	0.00%
Additional wasp nest (no concessions)	11.90	11.90	0.00%
Commercial Pest Control			
Wasps (non contract)	131.80	135.50	2.81%
Wasps (contract)	104.70	107.50	2.67%
Minimum charge 1 hour, charged per 30 minutes thereafter			
Bedbugs, fleas and cockroaches	131.00	132.90	1.45%
Rats and Mice	125.00	127.80	2.24%
Contracts (additional treatment over and above agreed contracts terms and conditions)			
Bedbugs, fleas and cockroaches	104.30	106.10	1.73%
Rats and Mice	99.00	100.80	1.82%
Miscellaneous			
Fumigation void premises	100.40	102.20	1.79%
House clearance	63.10	64.90	2.85%
Key collections (Rugby area only)	62.30	64.67	3.80%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
<u>Untagged</u>			
First Offence	95.00	98.61	3.80%
Subsequent Offence	105.00	108.99	3.80%
<u>Tagged</u>			
First Offence	70.00	70.00	0.00%
Subsequent Offence	90.00	90.00	0.00%
Kennel costs (per day) subject to third party increases	18.00	18.70	3.89%
<i>Note: A day includes part days and is applied from the day of acceptance into the kennel.</i> <i>Micro-chipping is a service provided by the Councils Stray Dog Kennels Provider</i>			
Licensing			
<u>Animal Licences</u>			
House to House Licence	no charge	no charge	
<u>Pet Shops/Selling of animals</u>			
1 Year Licence	195.00	195.00	0.00%
2 Year Licence	320.00	320.00	0.00%
3 Year Licence	467.00	467.00	0.00%
Renewal	145.00	145.00	0.00%
<u>Animal Boarding Establishments (large establishments- 7 and over)</u>			
1 Year Licence	210.00	210.00	0.00%
2 Year Licence	367.00	367.00	0.00%
3 Year Licence	525.00	525.00	0.00%
Renewal	160.00	160.00	0.00%
<u>Animal Boarding Establishments (small establishments- 6 and under)</u>			
1 Year Licence	180.00	180.00	0.00%
2 Year Licence	315.00	315.00	0.00%
3 Year Licence	450.00	450.00	0.00%
Renewal	130.00	130.00	0.00%
<u>Dog day care</u>			
1 Year Licence	175.00	175.00	0.00%
2 Year Licence	300.00	300.00	0.00%
3 Year Licence	425.00	425.00	0.00%
Renewal	130.00	130.00	0.00%
<u>Hiring of horses (plus annual vet's fee- payable separately)</u>			
1 Year Licence	220.00	220.00	0.00%
2 Year Licence	385.00	385.00	0.00%
3 Year Licence	550.00	550.00	0.00%
Renewal	170.00	170.00	0.00%
<u>Breeding of Dogs (plus vet's fee- payable separately)</u>			
1 Year Licence	240.00	240.00	0.00%
2 Year Licence	420.00	420.00	0.00%
3 Year Licence	600.00	600.00	0.00%
Renewal	190.00	190.00	0.00%
Keeping or training animals for exhibition (3 year licence)	180.00	180.00	0.00%
Keeping or training animals for exhibition (renewal)	130.00	130.00	0.00%
Re-rating visits	175.00	175.00	0.00%
Variation of a licence	130.00	130.00	0.00%
Dangerous Wild Animals Act (excluding vet fees)	315.00	315.00	0.00%
Zoo Licence (excluding vet fees)	625.00	625.00	0.00%
Skin Piercing etc., Acupuncture, tattooing, electrolysis and ear piercing (per practitioner)	165.00	165.00	0.00%
Skin Piercing etc., Acupuncture, tattooing, electrolysis and ear piercing (temporary events e.g. conventions and guest tattooists. Limited to 2 weeks and only if registered with another local authority - proof required.)	40.00	40.00	0.00%
Ear piercing only (per practitioner)	85.00	85.00	0.00%
Food Premises Registration	no charge	no charge	
Sex Establishment Licence	4,779.90	4,779.90	0.00%
Hypnotism	100.00	100.00	0.00%
Pavement Licence	60.00	60.00	0.00%
<i>Note: all animal licenses may be subject to further vet fees in accordance with the relevant legislation.</i> <i>All fees stated exclude vet fees.</i>			
<u>Pollution Prevention and Control</u>			
The fee charging regime for these industries will change with effect from 1st April. The charging regime is set by Government annually. The new regime is risk based and full details are available on request or can be found at www.defra.gov.uk/environment/ppc/localauth/fees-risk/fees.htm			
<u>Lotteries and Amusement</u>			
Initial	40.00	40.00	0.00%
Renewal	20.00	20.00	0.00%
Licensing Act 2003			
<u>Main Application Fee - per Rateable Band</u>			
Band A	100.00	100.00	0.00%
Band B	190.00	190.00	0.00%
Band C	315.00	315.00	0.00%
Band D	450.00	450.00	0.00%
Band E	635.00	635.00	0.00%
Band D X (2)	900.00	900.00	0.00%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Band E X (3)	1,905.00	1,905.00	0.00%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
<u>Main Annual Charge</u>			
Band A	70.00	70.00	0.00%
Band B	180.00	180.00	0.00%
Band C	295.00	295.00	0.00%
Band D	320.00	320.00	0.00%
Band E	350.00	350.00	0.00%
Band D X (2)	640.00	640.00	0.00%
Band E X (3)	1,050.00	1,050.00	0.00%
<u>Variation</u>			
Band A	100.00	100.00	0.00%
Band B	190.00	190.00	0.00%
Band C	315.00	315.00	0.00%
Band D	450.00	450.00	0.00%
Band E	635.00	635.00	0.00%
<u>Personal Licences, Temporary Events and Other Fees</u>			
Application for a grant or renewal of personal licence	37.00	37.00	0.00%
Temporary event notice	21.00	21.00	0.00%
Theft, loss etc. of premises licence or summary	10.50	10.50	0.00%
Application for a provisional statement where premises being built etc.	varies	varies	
Notification of change of name or address	10.50	10.50	0.00%
Application to vary licence to specify individual as premises supervisor	23.00	23.00	0.00%
Application for transfer of premises licence	23.00	23.00	0.00%
Theft, loss etc. of certificate or summary	10.50	10.50	0.00%
Notification of change of name alteration of rules of club	10.50	10.50	0.00%
Change of relevant registered address of club	10.50	10.50	0.00%
Theft, loss etc. of temporary event notice	10.50	10.50	0.00%
Theft, loss etc. of personal licence	10.50	10.50	0.00%
Duty to notify change of name or address	10.50	10.50	0.00%
Right of freeholder etc. to be notified of licensing matters	21.00	21.00	0.00%
Interim Authority notice following death etc. of licence holder	23.00	23.00	0.00%
<u>Fees for Scrap Metal Dealers Act 2013 scrap metal licence applications and incidental costs</u>			
Scrap metal dealer site licence application fee	350.00	350.00	0.00%
Scrap metal dealer site licence renewal fee	250.00	250.00	0.00%
Scrap metal dealer site licence variation fee	90.00	90.00	0.00%
Scrap metal dealer collector licence fee	250.00	250.00	0.00%
Scrap metal dealer collector renewal fee	230.00	230.00	0.00%
Scrap metal dealer collector variation fee	90.00	90.00	0.00%
Replacement licence	30.00	30.00	0.00%
<u>Fees for Mobile Homes Act 2013 licence applications and incidental costs</u>			
Application	250.00	250.00	0.00%
Annual fee 2 to 10 residential units	150.00	150.00	0.00%
Annual fee 11 to 30 residential units	220.00	220.00	0.00%
Annual fee 31+ residential units	300.00	300.00	0.00%
Compliance notice	335.00	335.00	0.00%
Transfer of licence	72.00	72.00	0.00%
Variation of licence	215.00	215.00	0.00%
<i>Fees only apply to relevant mobile homes sites. If exempt, licence fee £nil, no annual fee, compliance notices do not apply and transfer or variation fees £nil.</i>			
<u>Licensed premises gaming machines permits:</u>			
Grant	150.00	150.00	0.00%
Existing operator grant	100.00	100.00	0.00%
Variation	100.00	100.00	0.00%
Transfer	25.00	25.00	0.00%
Annual fee	50.00	50.00	0.00%
Change of name	25.00	25.00	0.00%
Copy of permit	15.00	15.00	0.00%
<u>Licensed premises automatic notification process</u>			
On Notification	50.00	50.00	0.00%
<u>Club gaming permits</u>			
Grant	200.00	200.00	0.00%
Grant (club premises certificate holder)	100.00	100.00	0.00%
Existing operator grant	100.00	100.00	0.00%
Variation	100.00	100.00	0.00%
Renewal	200.00	200.00	0.00%
Renewal (club premises certificate holder)	100.00	100.00	0.00%
Annual fee	50.00	50.00	0.00%
Copy of permit	15.00	15.00	0.00%
<u>Club machine permits</u>			
Grant	200.00	200.00	0.00%
Grant (club premises certificate holder)	100.00	100.00	0.00%
Existing operator grant	100.00	100.00	0.00%
Variation	100.00	100.00	0.00%
Renewal	200.00	200.00	0.00%
Renewal (club premises certificate holder)	100.00	100.00	0.00%
Annual fee	50.00	50.00	0.00%
Copy of permit	15.00	15.00	0.00%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
<u>Family entertainment centre gaming machine permits</u>			
Grant	300.00	300.00	0.00%
Renewal	300.00	300.00	0.00%
Existing operator grant	100.00	100.00	0.00%
Change of name	25.00	25.00	0.00%
Copy of permit	15.00	15.00	0.00%
<u>Prize gaming permits</u>			
Grant	300.00	300.00	0.00%
Renewal	300.00	300.00	0.00%
Existing operator grant	100.00	100.00	0.00%
Change of name	25.00	25.00	0.00%
Copy of permit	15.00	15.00	0.00%
<u>Converted Casino</u>			
Non-conversion provisional statement	no charge	no charge	
Non-conversion application	no charge	no charge	
1st Annual fee	2,400.00	2,400.00	0.00%
Annual fee	2,400.00	2,400.00	0.00%
Vary licence	1,600.00	1,600.00	0.00%
Transfer licence	1,080.00	1,080.00	0.00%
Reinstatement of licence	1,080.00	1,080.00	0.00%
Provisional	no charge	no charge	
<u>Bingo</u>			
Non conversion provisional statement	960.00	960.00	0.00%
Non conversion application	2,800.00	2,800.00	0.00%
1st annual fee	800.00	800.00	0.00%
Annual fee	800.00	800.00	0.00%
Vary Licence	1,400.00	1,400.00	0.00%
Transfer Licence	960.00	960.00	0.00%
Reinstatement of licence	960.00	960.00	0.00%
Provisional	2,800.00	2,800.00	0.00%
<u>Adult Gaming Centre</u>			
Non conversion provisional statement	960.00	960.00	0.00%
Non conversion application	1,600.00	1,600.00	0.00%
1st annual fee	800.00	800.00	0.00%
Annual fee	800.00	800.00	0.00%
Vary licence	800.00	800.00	0.00%
Transfer licence	960.00	960.00	0.00%
Reinstatement of licence	960.00	960.00	0.00%
Provisional	1,600.00	1,600.00	0.00%
<u>Track betting</u>			
Non conversion provisional statement	790.00	790.00	0.00%
Non conversion application	2,050.00	2,050.00	0.00%
1st annual fee	830.00	830.00	0.00%
Annual fee	830.00	830.00	0.00%
Vary licence	1,050.00	1,050.00	0.00%
Transfer Licence	790.00	790.00	0.00%
Reinstatement of licence	790.00	790.00	0.00%
Provisional	2,100.00	2,100.00	0.00%
<u>Betting (other)</u>			
Non conversion provisional statement	1,000.00	1,000.00	0.00%
Non conversion application	2,500.00	2,500.00	0.00%
1st annual fee	500.00	500.00	0.00%
Annual fee	500.00	500.00	0.00%
Vary licence	1,250.00	1,250.00	0.00%
Transfer licence	1,000.00	1,000.00	0.00%
Re-instatement of licence	1,000.00	1,000.00	0.00%
Provisional	2,500.00	2,500.00	0.00%
<u>Family Entertainment Centre</u>			
Non conversion provisional statement	790.00	790.00	0.00%
Non conversion application	1,650.00	1,650.00	0.00%
1st annual fee	625.00	625.00	0.00%
Annual fee	625.00	625.00	0.00%
Vary licence	830.00	830.00	0.00%
Transfer licence	790.00	790.00	0.00%
Re-instatement of licence	790.00	790.00	0.00%
Provisional	1,650.00	1,650.00	0.00%
Temporary Use Notices	500.00	500.00	0.00%
Copy of Licences	25.00	25.00	0.00%
Notification of Change of Licence	50.00	50.00	0.00%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Hackney Carriages			
Vehicle Licence			
Vehicle Licence- New (valid for one year)	200.00	200.00	0.00%
Vehicle Licence- Renewal (valid for one year)	190.00	190.00	0.00%
Vehicle Licence- if vehicle six years + (valid for 6 months)	100.00	100.00	0.00%
Transfer of Vehicle Licence	190.00	190.00	0.00%
Replacement Vehicle Plate	20.00	20.00	0.00%
Replacement Vehicle Plate Bracket	10.00	10.00	0.00%
DBS checks	50.00	50.00	0.00%
Knowledge Test	40.00	40.00	0.00%
DVLA check	10.00	10.00	0.00%
Transfer of Proprietor	10.00	10.00	0.00%
Vehicle Safety Check (Carried out by Rugby Borough Council Work Services)	50.00	50.00	0.00%
Vehicle Safety Check cancellation fee	10.00	10.00	0.00%
Operator's Licence:			
New Applications (valid for 5 years):			
1-4 Vehicles	790.00	790	0.00%
5-9 Vehicles	860.00	860	0.00%
10-19 Vehicles	970.00	970	0.00%
20+ Vehicles	1,130.00	1130	0.00%
Application Renewal (valid for 5 years)			
1-4 Vehicles	790.00	790	0.00%
5-10 Vehicles	860.00	860	0.00%
10 or more Vehicles	970.00	970	0.00%
20+ Vehicles	1,130.00	1130	0.00%
Driver's Licence - Dual Hackney and PHV Licence:			
New Application (Valid for 3 years)	480.00	480.00	0.00%
Application Renewal (Valid for 3 years)	480.00	480.00	0.00%
Transfer of Vehicle Licence	190.00	190.00	0.00%
Replacement Vehicle Plate	20.00	20.00	0.00%
Replacement Vehicle Plate Bracket	10.00	10.00	0.00%
Knowledge Test	40.00	40.00	0.00%
Replacement Operators License	10.00	10.00	0.00%
Transfer of Proprietor	10.00	10.00	0.00%
Replacement of Dual Drivers License/PHV License (Badge)	20.00	20.00	0.00%
Vehicle Safety Check (Carried out by Rugby Borough Council Work Services)	50.00	50.00	0.00%
Vehicle Safety Check cancellation fee	10.00	10.00	0.00%
Street Trading			
Street Trading License Application Cost		157.00	
Street Trading License Application License Cost		848.00	
Mobile License Annual Application Cost		157.00	
Mobile License Annual Application License Cost		552.00	
Temporary 7 day License Application Fee		157.00	
Temporary 7 day License Application License Fee		159.00	
Special Event Application Cost		91.00	
Special Event License Cost		23.00	
<i>Fees do not include any electrical charges (these will be charged separately)</i>			
Car Parking			
Off Street Parking			
John Barford Car Park			
Up to 3 hours	1.00	1.00	0.00%
Up to 5 hours	2.50	2.50	0.00%
Up to 11 hours	5.00	5.00	0.00%
Sunday	1.00	1.00	0.00%
Railway Terrace/Gas Street/Old Market Place			
Up to 3 hours	1.00	1.00	0.00%
Up to 5 hours	4.00	4.00	0.00%
Up to 11 hours	10.00	10.00	0.00%
Sunday	no charge	no charge	
Chestnut Field/North Street/Little Church Street/Evreux Way			
Up to 2 hours	1.00	1.00	0.00%
Up to 3 hours	1.30	1.30	0.00%
Sunday	1.00	1.00	0.00%
Westway			
Up to 5 hours	2.50	2.50	0.00%
Up to 11 hours	5.00	5.00	0.00%
Sunday	no charge	no charge	
Newbold Road			
Up to 3 hours	1.00	1.00	0.00%
Up to 5 hours (weekdays only)	4.00	4.00	0.00%
Up to 11 hours	10.00	10.00	0.00%
Saturday up to 11 hours	3.00	3.00	0.00%
Sunday	no charge	no charge	
Penalty Charges			
Penalty charge	50.00 or 70.00	50.00 or 70.00	
Penalty charge if paid within 14 days	25.00 or 35.00	25.00 or 35.00	

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Season Tickets - Day Passes			
<u>John Barford/Westway</u>			
3 months	120.00	120.00	0.00%
6 months	215.00	215.00	0.00%
Yearly	400.00	400.00	0.00%
<u>Railway Terrace/Gas Street/Old Market Place</u>			
3 months	180.00	180.00	0.00%
6 months	325.00	325.00	0.00%
Yearly	615.00	615.00	0.00%
<u>Other Charges</u>			
Vehicles over 3 tonnes/Coaches	not permitted	not permitted	
Caravan/trailers and towing vehicles used for exhibitions, trade etc. (per space)	10.00	10.00	0.00%
Enforcement Charges			
Fixed Penalty Fines			
<i>The Council has, where possible, determined to set its own level of fines within the standard range of penalties. The general formula is adopted to set the default penalty level to be the maximum possible within the range for that offence. However, this penalty is DISCOUNTED to the minimum penalty possible within the range, IF the penalty is paid within 10 days in the case of Public Space Protection Orders and Fly tipping, and 7 days for all other listed offences.</i>			
	Fixed Penalty	Maximum	
Depositing Litter*	80.00	2,500.00	
*reduced to £50 if paid within 7 days			
Graffiti and fly posting	80.00	2,500.00	
Nuisance parking	100.00	2,500.00	
Fly tipping	400.00	unlimited	
Exposing vehicles for sale on a road	100.00	2,500.00	
Repairing vehicles on a road	100.00	2,500.00	
Abandoning a vehicle	200.00	2,500.00	
Unauthorised distribution of free printed matter	80.00	2,500.00	
Failure to furnish documentation (Waste Carriers Licence)	300.00	unlimited	
Failure to produce authority (Waste Transfer Note)	300.00	unlimited	
Failure to comply with a Public Space Protection Order*	100.00	2,500.00	
*reduced to £75 if paid within 10 days			
*Failure to comply with a Community Protection Notice (Individual)	100.00	2,500.00	
*reduced to £ 50 if paid within 10 days			
Failure to comply with a Community Protection Notice (Business)	100.00	unlimited	
Failure to comply with noise warning notice (licenced)	500.00	unlimited	
Failure to comply with a Public Space Protection Order (Dogs)*	100.00	1,000.00	
*reduced to £ 50 if paid within 10 days			
Landlords			
<i>Implementation of the Smoke and Carbon Monoxide Alarm (England) Regulations 2015 on 1st April 2015 will result in penalty charges being issued against landlords where they have breached their legal duties in relation to offences under the regulations which require landlords to provide smoke alarms and carbon monoxide alarms in rented properties:</i>			
	Charges Imposed	If Paid Within 14 Days	
First Offence	1,000.00	750.00	
Second Offence	2,000.00	n/a	
Third Offence (and all Consequent Offences)	5,000.00	n/a	
Officer Rates			
For reclaiming officer costs when investigating matters that result in a legal proceeding being instituted etc.			
Category A - salary grade D and below	59.50	61.80	3.87%
Category B - salary grade E to F	78.40	81.40	3.83%
Category C - salary grade G	100.20	104.00	3.79%
Category D - Heads of Service or above	119.20	123.70	3.78%
<u>Administration charges for works in default etc.:</u>			
For each property or person responsible, minimum fee to apply until hourly rate and associated costs exceed this figure			
	72.20	74.90	3.74%
Any associated letters, reports etc.	15.20	15.80	3.95%
Officers statement for solicitors (minimum 1 hour)	officer rates	officer rates	
Mileage charged at current casual user rates			
Note: Fees and Charges marked with an asterisk "*" are set by national legislation and will be amended as and when specified charges are amended			

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Operations and Traded Services			
Bulky Waste Service			
Bulky Waste Collection - up to 3 items	35.00	40.00	14.29%
<u>Each Additional Item:</u> Up to a maximum of 6	7.00	5.00	-28.57%
Over 6 household items or any number of garden items (sheds, play equipment)	price on application		
Cancellation Fee	5.00	10.00	100.00%
Garden Waste Service			
Domestic Garden Waste Collection (annual subscription)- charge per bin	46.00	46.00	0.00%
Trade Waste			
Trade Waste	price on application		
Emptying of Litter/Dog Waste Bin not on the Public Highway	3.00 per bin per empty	3.5 per bin per empty	16.67%
Street Cleansing Service			
Minor Road Closures	price on application		
Event Bin Hire	price on application		
Post Event Clearance	price on application		
Private Road/Carpark Sweeping	price on application		
COMMUNITIES & HOMES			
Welfare Services			
Replacement access fobs	15.30	15.90	3.92%
Lifeline Personal Alarm Service - weekly charge	5.60	5.80	3.57%
Easy Press Adaptor Pendant (one off cost)	10.50		-100.00%
Replacement Lifeline Pendant (one off cost)	62.64	65.00	3.77%
Fall Detector (one off cost)	100.00	103.80	3.80%
GSM Sim Card	1.20	1.20	0.00%
<i>NOTE: Some residents may qualify for a VAT exemption.</i>			
Housing Services			
Housing Guest Bedroom Charges (Including VAT)	17.90		
Housing Services			
Private Housing Inspection and Assessment for Immigration and other purposes	250.00	259.50	3.80%
House in Multiple Occupation Licence fee (valid for 5 years):			
<u>Where Landlord approaches Council:</u>			
1-6 occupants	1362.00	1,362.00	0.00%
7-11 occupants	1556.00	1,556.00	0.00%
12+ occupants	1694.00	1,694.00	0.00%
Surcharge where Landlord is found to be running an unlicensed HMO (in addition to relevant application fee)	900.00	934.20	3.80%
Renewal of an HMO Licence (valid for 5 years)	1177.00	1,177.00	0.00%
Copy of Licence	34.60	35.90	3.76%
Variation of Licence	208.50	216.40	3.79%
Revoking licence	208.50	216.40	3.79%
Service of Hazard awareness notice			
Service of formal notice/order	639.70	664.00	3.80%
Additional notices/orders for multiple hazards	64.10	66.50	3.74%
DBS check	50.00	50.00	0.00%
Public Registers and Other Information			
<i>All public registers can be viewed in person free of charge and attempts are being made to make some or all of these available on the internet.</i>			
Contaminated land and pollution searches	Price on application	Price on application	
Complete copies of list of Registered Food Premises	320.00	320.00	0.00%
Partial copies of the list of Registered Food Premises	0.00	0.00	0.00%
<u>Copies of or from other Public Registers:</u>			
Complete premises files (printed, plus photocopying charge)	40.00	40.00	0.00%
Partial extracts from premises file (per request, plus copying)	20.00	20.00	0.00%
Printed copies of Air Quality Assessment Reports etc	51.00	51.00	0.00%
<i>Information may be available in an electronic format. Prices available on request.</i>			
FINANCE, PERFORMANCE, LEGAL AND GOVERNANCE			
Legal Services			
Copy Document – S106 Agreement: Bilateral Agreement or Unilateral Undertaking*	79.00	82.00	3.80%
Copy Document – S106 Agreement: Supplemental Deed or Deed of Variation*	41.00	42.60	3.90%
Copy Document – TPO*	41.00	42.60	3.90%
Ex-Council House Consent	79.00	82.00	3.80%
Ex-Council House Consent: Retrospective	116.90	121.30	3.76%
Copy Document – Lease or Shared Ownership Lease	78.20	81.20	3.84%
Copy Document – Enforcement Notices	23.40	24.30	3.85%
Copy Document – Smoke Control Order	38.70	40.20	3.88%
Ex-Council House Deed of Postponement	79.00	82.00	3.80%
Ex-Council House Letter of Compliance	79.00	82.00	3.80%
Leasehold Enquiries	116.90	121.30	3.76%
Certificate of Existence	16.30	16.90	3.68%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
* Standard turnaround for copies is 1-3 working days. However, if any of the above documents require expediting straight away, an additional £30.00 is added to each. Copy documents will be emailed out to customers where possible. A number of copy documents are available on the Council's publicly accessible registers and customers are requested to check these registers prior to making a request for a copy document. Where the Council has already scanned a copy document in and holds an electronic version that can be emailed to the customer, an administration charge of £15 will be made rather than the fee shown above.			
Electoral Services			
The Open Electoral Register can be purchased in either data or paper form:- Fee for data copy £20.00 plus £1.50 for every 1,000 entries or part thereof purchased Fee for paper copy £10.00 plus £5.00 for every 1,000 entries or part thereof purchased			
EXECUTIVE DIRECTOR			
Freedom of Information and Environmental Information Regulation requests are charged for in just two cases:- - where the cost of answering the enquiry goes over £450; and - where there are costs for preparing the information e.g. printing, photocopying, postage, providing information in other formats (CD-ROM, audio cassette, translation) The time spent dealing with the above is calculated at £25 per hour. With the majority of requests the costs will be less than £450 and we will make no charge for the work involved. If however, the cost of dealing with your request goes over £450 we will contact you to discuss the information you have requested and the cost of providing it. If you still want the information in a format that is going to take the cost over that limit, then we will charge you the full amount. - Photocopying or printing material; - Postage; - Producing material in a different format when requested e.g. CD Rom, audio cassette; - Providing extracts of databases; - Translating the material into a different language where requested; - Allowing you to reasonable time to inspect a record containing the information (FOI only); - 10p per A4 sheet for printing or photocopying, black and white; - 20p per A3 sheet for printing of photocopying, black and white; - 92p per A4 sheet for printing or photocopying, colour; - £1.24 per A3 sheet for printing or photocopying, colour; - Postage costs - documents will be sent by second class mail unless specified otherwise; - Any costs involving staff time will be charged at £25 per hour. We can charge for these costs in all cases, whether or not we can also charge for the prescribed costs. If the total cost is less than £10, there is no charge.			

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Leisure and Wellbeing			
Rugby Art Gallery and Museum			
Floor One Gallery artist exhibition hire 2 weeks	155.10	161.00	3.80%
Public Liability Insurance administration fee (Floor One Gallery)	33.00	34.30	3.94%
Children's workshops - 2 hours	12.70	13.20	3.94%
Children's workshops - 10 - 4	31.70	32.90	3.79%
Baby Splats	6.90	7.00	1.45%
Tripointum - Roman Britain school workshop	126.70	150.00	18.39%
Roman Day	272.50	285.00	4.59%
Arts Award 'Discover in a Day' school session per child	8.70	9.00	3.45%
Sketch book journey school workshop	126.70	150.00	18.39%
Historic loans box hire	8.70	9.00	3.45%
Magic Carpet	145.70	150.00	2.95%
Draw, Draw, Draw	126.70	150.00	18.39%
Rugby Collection	120.40	125.00	3.82%
Archaeological archive deposits, per box:			
Large box - £330.30 (up to 255mm x 405mm x 225mm)	330.30	330.30	0.00%
Small box - £165.15 (up to 268mm x 405mm x 80mm)	165.15	165.15	0.00%
Centre supervisor to stay after hours (hourly rate)	52.80	54.80	3.79%
Gallery Assistant (per hour)	39.50	41.00	3.80%
Education Room 1 - hire charges			
Per hour	29.80	30.90	3.69%
National Charities/Education	23.90	24.80	3.77%
Local Groups/Charities/Education	20.80	21.60	3.85%
Education Room 2 - hire charges			
Per hour	21.10	21.90	3.79%
National Charities/Education	16.90	17.50	3.55%
Local Groups/Charities/Education	14.60	15.20	4.11%
Note: Room Hire			
FULL day room hire offers a 5% discount			
Refreshments can be provided at an additional cost please contact service directly for details			
Rugby Open fee - single artwork	8.40	8.70	3.57%
Rugby Open fee - three artworks	22.10	22.90	3.62%
Rugby Open late collection of artwork fee (per artwork per day)	6.10	6.30	3.28%
Rugby Open commission on artwork sales	25% commission	25% commission	
Benn Hall			
Monday - Thursday per hour			
Main Hall	45.00	60.00	33.33%
Rokeby Room	30.00	40.00	33.33%
Bar	25.00	30.00	20.00%
Whole Building	75.00	100.00	33.33%
Friday 9-5 per hour			
Main Hall	75.00	75.00	0.00%
Rokeby Room	50.00	50.00	0.00%
Bar	25.00	25.00	0.00%
Whole Building	125.00	125.00	0.00%
Friday from 5pm, Saturday, Sunday & Bank Holidays per hour			
Whole Building	125.00	125.00	0.00%
Use of Kitchen Facilities for the provision of:-			
Tea/Coffee/Squash/Biscuits	45.00	45.00	0.00%
All other catering per hour	30.00	30.00	0.00%
Show Packages			
Monday - Wednesday	520.00	820.00	57.69%
Thursday to Sunday	820.00	1020.00	24.39%
NOTE:			
(a) Preparation time, if required, must be arranged at time of booking. Please note this cannot always be guaranteed.			
(b) Christmas Eve, New Year's Eve and New Year's Day will be charged at weekend rate.			
Sports and Recreation			
Use of Community Sports Coach	21.30	21.30	0.00%
Use of a Play Ranger	21.30	21.30	0.00%
Use of On Track Sports Leaders			
Schools (PPA/Lunch)	21.30	22.10	3.76%
Sport Specific	25.80	26.80	3.88%
Mentoring	25.80	26.80	3.88%
Small Group Work	38.70	40.20	3.88%
Youth Club	21.80	22.60	3.67%
Sport Leader Courses	38.70	40.20	3.88%
Boxing Leader Courses	38.70	40.20	3.88%

Fees and Charges Schedule 2026-27					
	Current Fee 2025/26		PROPOSED Fee 2026/27		% increase
Parks and Open Spaces					
Caldecott Park - to be fixed with the café leaseholder					
Special Events on Parks and Open Spaces					
Sports Tournaments	price on application		price on application		
Charitable Events	no charge		no charge		
Dog Shows - per opening day	372.70		386.90		3.81%
Fairs/Circuses - per operating day	494.60		513.40		3.80%
Fairs/Circuses - per setting up day	141.00		146.40		3.83%
Returnable deposit for new fair/circus operator	390.60		405.40		3.79%
Commercial Events	497.00		515.90		3.80%
Filming rights (per day)	264.00		274.00		3.79%
Ice Cream Licence	price on application		price on application		
NOTE: SPORTS PITCHES ARE HIRED PER SESSION (not including time spent changing)					
All hirers must provide evidence of Public Liability insurance of £5 million					
and sign the current Terms and Condition of Hire					
Matches must be completed by 9pm Monday to Saturday and by 6pm on Sunday					
Rugby Football: 1 session is deemed to last up to 100 minutes					
Football: 1 session is deemed to last up to 120 minutes					
Cricket: 1 session is deemed to last up to 4 hours					
Changing Facilities: where booked will be charged per pitch session as above					
This is an unattended service provided to specific clubs/teams by prior agreement.					
An attended service is available for a casual booking - additional charge payable					
Where an all day booking is made, morning is deemed to be one session, afternoon one session and evening one session. Each session will be charged as detailed.					
Senior pitch hire					
	Single Booking	Block Booking	Single Booking	Block Booking	
Football, Rugby, Cricket, Gaelic Football (Block Booking, sports teams or coaches)	45.80	39.90	47.54	41.42	3.80%
Football, Rugby, Cricket, Gaelic Football (Single Booking)	54.96	39.90	57.05	41.42	3.80%
Intermediate pitch hire					
Football (Block Booking, sports teams or coaches)	35.70	31.70	37.06	32.90	3.80%
Football, Rugby, Cricket, Gaelic Football (Single Booking)	42.84	31.70	44.47	32.90	3.80%
Junior pitch hire					
Football, Rugby (Block Booking, sports teams or coaches)	35.70	31.70	37.06	32.90	3.80%
Football, Rugby, Cricket, Gaelic Football (Single Booking)	42.84	31.70	44.47	32.90	3.80%
Mini pitch hire					
Football (Block Booking, sports teams or coaches)	17.90	15.30	18.58	15.88	3.80%
Football, Rugby, Cricket, Gaelic Football (Single Booking)	21.48	15.30	22.30	15.88	3.80%
UNAUTHORISED USE OF FACILITIES - DOUBLE FEE PAYABLE					
Training (per training session) (Block Booking, sports teams or coaches)	12.30	12.90	12.77	13.39	3.80%
Training (per training session) (Single Booking)	14.76	12.90	15.32	13.39	3.80%
Changing Rooms (subject to change as facilities are refurbished)					
Charged per session as above. Changing rooms are opened as for Football/Cricket, 30 minutes before kick-off, Rugby/Gaelic 60 minutes before kick-off and early opening - price on application.					
Unattended regular use through the season on specified number of occasions (minimum 10)					
Seniors per room per occasion (no refunds unless cancelled by Council)	22.70		23.60		3.96%
Juniors per room per occasion (no refunds unless cancelled by Council)	15.60		16.20		3.85%
Juniors					
Weekly access to toilets only (For season- dates as agreed)	310.70		322.50		3.80%
Unattended casual use (less than 10 occasions)					
Seniors £18.00 per room per occasion	27.50		28.50		3.64%
Juniors £12.50 per room per occasion	19.10		19.80		3.66%
Attended Service	Additional £25 payable				
Late Booking Charges					
Each Pitch (Including VAT)	13.10		13.60		3.82%
Changing room(s) (plus VAT as appropriate)	13.10		13.60		3.82%
Professional Trainers (per hour)					
	17.90		18.60		3.91%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Growth and Investment			
Planning Services			
<u>Pre-application Charges</u>			
Householder Extensions or Outbuildings	110.00	115.00	4.55%
<u>Other Commercial Development</u>			
1-4 Dwellings, Agriculture, Change of Use or other Minor Development Proposals	470.00	490.00	4.26%
Additional Meeting or Advice Notice in regard to above	145.00	150.00	3.45%
5-9 Dwellings; or any development with 500m2 to 999m2 of Floor Space	1,260.00	1,310.00	3.97%
Additional Meeting or Advice Notice in regard to above	145.00	150.00	3.45%
10 to 49 dwellings; or any development up to 0.49; or 1,000 to 4,999 m2 of floor space	2,870.00	2,980.00	3.83%
Additional Meeting or Advice Notice in regard to above	600.00	625.00	4.17%
50 to 99 dwellings; or development 0.5 to 0.99ha or 5,000 to 9,999 m2 of floor space	4,420.90	4,590.00	3.83%
Additional Meeting or Advice Notice in regard to above	600.00	625.00	4.17%
100-199 Dwellings or development 1ha to 2ha	Price on application	Price on application	
Additional Meeting or Advice Notice in regard to above	Price on application	Price on application	
200+ Dwellings; or development greater than 2 ha; or gross floor area greater than 10,000m2	Price on application	Price on application	
Additional Meeting or Advice Notice in regard to above	Price on application	Price on application	
<u>Planning Performance Agreements</u>			
Major strategic developments where a Planning Performance Agreement (PPA) is required: to be negotiated	price on application	price on application	
Planning Application Fees - set nationally			
<u>A Guide to the Fees for Planning Applications in England</u>			
Available on line via national Planning Portal website			
<u>Plan Printing – Size A0 + (per copy)</u>			
Size A0	10.70	11.10	3.74%
Size A1	7.90	8.20	3.80%
Size A2	5.40	5.60	3.70%
Size A3	2.50	2.60	4.00%
Size A4	1.20	1.25	4.17%
Size A5	1.20	1.25	4.17%
<u>Planning Decision Notices (including appeal decisions)</u>			
Per copy	20.00	20.80	4.00%
<u>Miscellaneous Documentation</u>			
First copy from each file	1.20	1.25	4.17%
Subsequent copies (black and white) per side	0.11	0.15	36.36%
Subsequent copies (colour) per side	0.22	0.25	13.64%
<u>Section 106 Agreements & Unilateral Undertakings</u>			
For any obligation related to Affordable Housing which contains eligibility criteria	600.00	625.00	4.17%
For each obligation which only seeks a monetary contribution	600.00	625.00	4.17%
5% of the total financial contribution per obligation where additional ongoing monitoring is required over and above just a monetary contribution			
Any large scale developments (such as 350 dwellings or more, or 15,000 square metres gross or more, including Sustainable Urban Extensions, will be subject to bespoke monitoring fee arrangements			
<u>Additional monitoring fees for Section 106 Agreements, Unilateral Undertakings and Conditions</u>			
Site inspection fee	240.00	250.00	4.17%
Approval of details/documents, including conditions per submission/compliance request	360.00	375.00	4.17%
Deed of variation per s106/ UU topic	710.00	740.00	4.23%
Monitoring in relation to discounted market affordable housing dwellings (per dwelling)	500.00	520.00	4.00%
Confirmation Planning Enforcement Notice or other such formal enforcement matter has been complied with or request to be withdrawn (per notice/matter) from a property/site and/or Land Charges Register	250.00	260.00	4.00%
<u>Biodiversity net gain (BNG)</u>			
Biodiversity net gain (BNG) monitoring for all new applicable development sites in relation to onsite and offsite BNG and Habitat Banks	price on application dependent on size of site	price on application dependent on size of site	
Building Control			
From 1st April 2015 regulatory activities will be undertaken by Warwick District Council as a shared partnership. Please visit www.warwickdc.gov.uk for further information.			
Land Charges			
Additional Questions each	45.90	47.70	3.92%
Additional Parcels each	23.10	24.00	3.90%
Con29 - Residential	130.50	135.60	3.91%
Con29 - Commercial	0.00	155.70	0.00%
Con29 O - Optional Enquiries, except ones listed below	21.90	22.80	4.11%
Con29 O - Optional Enquiry 22	23.40	24.30	3.85%
*We DO NOT answer Questions 4 & 16			
<u>Other CON29 questions</u>			
Question 1.1 j, k, l	21.00	21.80	3.81%
Question 2	41.10	42.70	3.89%
Question 3.7	18.30	19.00	3.83%
Question 3.8	6.30	6.50	3.17%
Question 3.9	6.60	6.90	4.55%
Question 3.11	19.80	20.70	4.55%
Question 3.13	2.10	2.10	0.00%
Environmental Information Regulations 2004 (as amended) request (Part 2, Regulation 8) (excluding Planning CON29 requests)			
	0.00	25.00	0.00%
*Flat rate figure as advised by the Information Commissioner's Office			
Rugby Outdoor Market			
Rugby Market Daily Pitch Fee (payable to CJ Events)	28.00	28.00	0.00%
Electricity (per day)			
13 amp plug	0.00	6.60	0.00%
16 amp plug	0.00	9.24	0.00%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Street name and numbering			
Add a name to an existing address - Price per address	31.70	32.90	3.79%
Change an existing address - Price per address	31.70	32.90	3.79%
Register a new address - Price per address	31.70	32.90	3.79%
New Addresses on Large Developments - Price per 2 - 5 plots	126.70	131.50	3.79%
New Addresses on Large Developments - Price per 6 - 10 plots	253.50	263.10	3.79%
New Addresses on Large Developments - Price per 11 - 19 plots	380.20	394.60	3.79%
New Addresses on Large Developments - Price per 20+ plots	507.00	526.30	3.81%
New Addresses on Large Developments - Price per additional plot over 20 plots	19.00	19.70	3.68%
Register a new Street - Price per street	126.70	131.50	3.79%
Rename an existing street - Price per street	253.50	263.10	3.79%
+ a per address charge - Price per address	31.70	32.90	3.79%
Regulation and Safety			
Bereavement Services - Crematorium			
<i>Note: Adult rates apply to persons aged 18 or over</i>			
<u>Cremation Fees -inclusive of medical referee fees, unwitnessed scattering of ashes and environmental levy (where applicable)</u>			
Child - up to 24 weeks gestation	no charge	no charge	
Child - from 24 weeks gestation up to and including 17 years of age (N.B. this is not to be paid by the family but will be claimed from the Children's Funeral Fund by RBC)	310.00	322.00	3.87%
Adult - service 10.00am - 4pm (45 mins max chapel time, to include entry and exit of chapel)	1,050.00	1,160.00	10.48%
Adult - service 9.00am (45 mins max chapel time, to include entry and exit of chapel)		1,060.00	
Adult - no service 8.15am - 8.25am (no music, minister or family present)	610.00	610.00	0.00%
Adult- no service with attendance 8.30am to 9am (max 25 people, 10 mins chapel time)	660.00	660.00	0.00%
Cremation of body parts (<i>if we did not cremate deceased</i>)	243.00	252.00	3.70%
Cremation of body parts (<i>if we cremated deceased</i>)	110.00	115.00	4.55%
Use of Ceremony Room (No Cremation)	360.00	374.00	3.89%
Extended Chapel Time - Booked In advance (Additional 45mins)		360.00	
Extended Chapel Time - Not booked in advance		450.00	
<u>Weekend Surcharge</u>			
Saturday cremation 10.00am - 12 noon - strict rotation	770.00	800.00	3.90%
Saturday interment of cremated remains (am only)	325.00	340.00	4.62%
Saturday scattering of cremated remains (am only)	130.00	135.00	3.85%
Scattering of ashes when cremation has taken place at Rainsbrook	55.00	58.00	5.45%
Scattering of ashes when cremation has taken place elsewhere	108.00	113.00	4.63%
Wooden casket/biodegradable casket	From £80	From £90	
Additional Biobox	16.00	17.00	6.25%
Forwarding cremated remains by post (inland)	price on application	price on application	
DVD recording of service	80.00	85.00	6.25%
Download link (Add on)	30.00	35.00	16.67%
Download link (stand alone)	60.00	65.00	8.33%
Music tribute up to 25 photographs timed to your chosen piece of music	95.00	100.00	5.26%
Music tribute up to 50 photographs timed to your chosen piece of music	125.00	135.00	8.00%
Basic slideshow (up to 25 photographs played on a loop throughout the service – cannot be timed to music)	65.00	70.00	7.69%
Themed tribute up to 25 photographs timed to your chosen piece of music	120.00	130.00	8.33%
Themed tribute up to 50 photographs timed to your chosen piece of music	150.00	160.00	6.67%
Virtual Memorial Service (for unattended services)	60.00	83.00	38.33%
Single photograph displayed	10.00	12.00	20.00%
Family Supported Tribute	40.00	42.00	5.00%
Bespoke tributes	price on application	price on application	
Webcast	95.00	100.00	5.26%
Administration fee (for additional work/non compliance) (For Clarification please call the office)	From £50	From £55	
Bearer's fee (advance booking only)	40.00	40.00	0.00%
Late arrival / overrun per 15 minutes past the booked time)	360.00	375.00	4.17%
Late cancellation	115.00	120.00	4.35%
Retention of ashes (per month, after first three months)	27.00	30.00	11.11%
Duplicate Cremation certificate	16.00	17.00	6.25%
Family history search	55.00	57.00	3.64%
Corporate Events		price on application	
<u>Memorial Items</u>			
<u>Book of Remembrance</u>			
Two line entry	100.00	105.00	5.00%
Five line entry	160.00	168.00	5.00%
Five line entry with emblem	220.00	230.00	4.55%
Eight line entry	240.00	250.00	4.17%
Eight line entry with emblem	280.00	290.00	3.57%
Memorial Tree (Bronze Plaque only, 10 year lease)	600.00	650.00	8.33%
Memorial Barbican Plaque (5 year lease)	550.00	570.00	3.64%
Memorial Bench (Bronze Plaque only, 10 year lease)	600.00	650.00	8.33%
Granite Memorial Package (50 year lease, inclusive price)	From £2,750	From £2,850	
Memorial Kerb (10 year lease)	800.00	830.00	3.75%
Tree of Life (10 year lease)	650.00	675.00	3.85%
Memorial Boulder (10 year lease)	800.00	830.00	3.75%
Armed Forces Plaque	700.00	730.00	4.29%
Bespoke Memorial	Prices from 150.00	Prices from 150.00	
Reservation fee: Granite Memorial Annual Charge for Space only	130.00	150.00	15.38%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Bereavement Services - Cemeteries			
Croop Hill Cemetery, Whinfield Cemetery, Watts Lane Cemetery, Clifton Road Cemetery			
<u>Burial Charges</u>			
Non-residents of Rugby are subject to triple fees in respect of Exclusive Right of Burial and Interment fees			
<u>Purchase of Exclusive Right of Burial for 50 years</u>			
Adult's Plot	2,100.00	2,200.00	4.76%
Adult Plot - Reservation Fee	n/a		
Adult's Plot - Watts Lane Green Burial area (single depth only)	2,100.00	2,200.00	4.76%
Adult Plot - Reservation Fee	n/a		
<u>Interment fees - preparation and backfilling of grave</u>			
Children - up to 24 weeks gestation - private arrangement	From no charge to 150.00	From no charge to 150.00	
Children - up to 24 weeks gestation - shared grave	150.00	156.00	4.00%
Children -from 24 weeks gestation up to 17 yrs (N.B. this is not to be paid by the family but will be claimed from the Children's Funeral Fund) – all areas including Cloverleaf Memorial Garden	450.00	470.00	4.44%
Adult grave	1,050.00	1,090.00	3.81%
Stepped single grave - for burial without coffin	1,100.00	1,150.00	4.55%
Weekend surcharge - Saturday 9.30am to 12.00 noon (when agreed)	785.00	815.00	3.82%
Construction of vault	price on application	price on application	
<u>Interment of Cremated Remains in a Cemetery</u>			
<u>Purchase of Exclusive Right of Burial for 50 yrs</u>			
Cremation plot for 2 caskets (most plots are this size)	800.00	830.00	3.75%
Cremation plot for 4 caskets (Croop Hill Cemetery)	950.00	986.00	3.79%
Reservation Fee - ashes plot	450.00	470.00	4.44%
<u>Interment fees (ashes)- preparation and backfilling of grave</u>			
Children -from 24 weeks gestation up to 17 yrs (N.B. this is not to be paid by the family but will be claimed from the Children's Funeral Fund)		470.00	
Adult - interment of cremated remains	450.00	470.00	4.44%
Adult - strewing of cremated remains under turf	250.00	260.00	4.00%
<u>~~Scattering of ashes on the surface is not permitted~~</u>			
Use of Cemetery Chapel at Watts Lane or Croop Hill Cemeteries	250.00	260.00	4.00%
On site appointment at cemeteries	50.00	52.00	4.00%
Use of Rainsbrook Ceremony Room (no cremation)	360.00	374.00	3.89%
Cemetery Memorial Tree with bronze plaque (10 year lease)	600.00	650.00	8.33%
Cemetery Memorial Bench			
Family History Search - Detailed genealogy research	56.00	58.00	3.57%
Exhumation			
Plaque on Whinfield Memorial Scrolls	300.00	350.00	16.67%
Plaque on Watts Lane Memorial Book	300.00	350.00	16.67%
Plaque on Child in Hand Memorial at Clifton Road	300.00	350.00	16.67%
Transfer of ownership of reserved grave to non resident (2 x EROB charge)	4,200.00	4,400.00	4.76%
Transfer of ownership	100.00	105.00	5.00%
Administration charge	From £50	From £55	
<u>Memorial Permit Fees</u>			
<u>Main Cemetery Areas (purchased graves only)</u>			
<u>Headstone (including any base slab)</u>			
Up to 5'6" high x 3'0" wide x 1'6" deep for Whinfield Cemetery, Watts Lane, Croop Hill and Clifton Road - Rainsbrook Cemetery up to 3ft tall	350.00	365.00	4.29%
<u>Vase</u>			
Up to 1'3" high and 1'0" diameter	200.00	208.00	4.00%
<u>Plaque/tablet - Main Cemetery Section</u>			
Up to 2'0" (h) x 2'6" (w) x 1'6" (d)	200.00	208.00	4.00%
<u>Plaque/tablet - Whinfield Cremation Section</u>			
Up to 2'0" (h) x 2'0" (w) x 2'0" (d)	200.00	207.60	3.80%
<u>Plaque/tablet - Watts Lane Cremation Section</u>			
Up to 2'0" (h) x 2'3" (w) x 2'0" (d)	200.00	208.00	4.00%
<u>Plaque/tablet - Croop Hill Cremation Section</u>			
Up to 1'6" (h) x 1'6" (w) x 3'0" (d)	200.00	208.00	4.00%
Added inscription to any memorial	200.00	208.00	4.00%
Replacement of existing memorial where no amendment to previous approval	50.00	52.00	4.00%
Kerbstones including headstone (where permitted)	600.00	623.00	3.83%
Kerbstones only (where permitted)	400.00	415.00	3.75%
Oversized headstone	5,000.00	5,190.00	3.80%
<u>Cloverleaf Memorial Garden</u>			
Contact Bereavement Services 01788 533715			

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Regulatory Services			
<u>Domestic Pest Control</u>			
Rats - up to 3 visits	65.80	67.80	3.04%
Mice - up to 3 visits	113.40	116.40	2.65%
Bedbugs - up to 2 visits	152.50	157.00	2.95%
Fleas - up to 2 visits	125.30	128.80	2.79%
Cockroaches - up to 3 visits	152.50	157.00	2.95%
Squirrels- up to 3 visits	109.10	112.10	2.75%
<u>Wasps and Hornets - up to 2 visits</u>			
General charge	96.10	96.10	0.00%
Additional wasp nest (no concessions)	11.90	11.90	0.00%
<u>Commercial Pest Control</u>			
Wasps (non contract)	131.80	135.50	2.81%
Wasps (contract)	104.70	107.50	2.67%
<u>Minimum charge 1 hour, charged per 30 minutes thereafter.</u>			
Bedbugs, fleas and cockroaches	131.00	132.90	1.45%
Rats and Mice	125.00	127.80	2.24%
<u>Contracts (additional treatment over and above agreed contracts terms and conditions)</u>			
Bedbugs, fleas and cockroaches	104.30	106.10	1.73%
Rats and Mice	99.00	100.80	1.82%
<u>Miscellaneous</u>			
Fumigation void premises	100.40	102.20	1.79%
House clearance	63.10	64.90	2.85%
Key collections (Rugby area only)	62.30	64.67	3.80%
<u>Untagged</u>			
First Offence	95.00	98.61	3.80%
Subsequent Offence	105.00	108.99	3.80%
<u>Tagged</u>			
First Offence	70.00	70.00	0.00%
Subsequent Offence	90.00	90.00	0.00%
Kennel costs (per day) subject to third party increases	18.00	18.70	3.89%
<i>Note: A day includes part days and is applied from the day of acceptance into the kennel. Micro-chipping is a service provided by the Councils Stray Dog Kennels Provider</i>			
Licensing			
<u>Animal Licences</u>			
House to House Licence	no charge	no charge	
<u>Pet Shops/Selling of animals</u>			
1 Year Licence	195.00	195.00	0.00%
2 Year Licence	320.00	320.00	0.00%
3 Year Licence	467.00	467.00	0.00%
Renewal	145.00	145.00	0.00%
<u>Animal Boarding Establishments (large establishments- 7 and over)</u>			
1 Year Licence	210.00	210.00	0.00%
2 Year Licence	367.00	367.00	0.00%
3 Year Licence	525.00	525.00	0.00%
Renewal	160.00	160.00	0.00%
<u>Animal Boarding Establishments (small establishments- 6 and under)</u>			
1 Year Licence	180.00	180.00	0.00%
2 Year Licence	315.00	315.00	0.00%
3 Year Licence	450.00	450.00	0.00%
Renewal	130.00	130.00	0.00%
<u>Dog day care</u>			
1 Year Licence	175.00	175.00	0.00%
2 Year Licence	300.00	300.00	0.00%
3 Year Licence	425.00	425.00	0.00%
Renewal	130.00	130.00	0.00%
<u>Hiring of horses (plus annual vet's fee- payable separately)</u>			
1 Year Licence	220.00	220.00	0.00%
2 Year Licence	385.00	385.00	0.00%
3 Year Licence	550.00	550.00	0.00%
Renewal	170.00	170.00	0.00%
<u>Breeding of Dogs (plus vet's fee- payable separately)</u>			
1 Year Licence	240.00	240.00	0.00%
2 Year Licence	420.00	420.00	0.00%
3 Year Licence	600.00	600.00	0.00%
Renewal	190.00	190.00	0.00%
Keeping or training animals for exhibition (3 year licence)	180.00	180.00	0.00%
Keeping or training animals for exhibition (renewal)	130.00	130.00	0.00%
Re-rating visits	175.00	175.00	0.00%
Variation of a licence	130.00	130.00	0.00%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Dangerous Wild Animals Act (excluding vet fees)	315.00	315.00	0.00%
Zoo Licence (excluding vet fees)	625.00	625.00	0.00%
Skin Piercing etc., Acupuncture, tattooing, electrolysis and ear piercing (per practitioner)	165.00	165.00	0.00%
Skin Piercing etc., Acupuncture, tattooing, electrolysis and ear piercing (temporary events e.g. conventions and guest tattooists. Limited to 2 weeks and only if registered with another local authority - proof required.)	40.00	40.00	0.00%
Ear piercing only (per practitioner)	85.00	85.00	0.00%
Food Premises Registration	no charge	no charge	
Sex Establishment Licence	4,779.90	4,779.90	0.00%
Hypnotism	100.00	100.00	0.00%
Pavement Licence	60.00	60.00	0.00%
Note: all animal licenses may be subject to further vet fees in accordance with the relevant legislation.			
All fees stated exclude vet fees.			
<u>Pollution Prevention and Control</u>			
The fee charging regime for these industries will change with effect from 1st April. The charging regime is set by Government annually. The new regime is risk based and full details are available on request or can be found at www.defra.gov.uk/environment/ppc/localauth/fees-risk/fees.htm			
<u>Lotteries and Amusement</u>			
Initial	40.00	40.00	0.00%
Renewal	20.00	20.00	0.00%
Licensing Act 2003			
<u>Main Application Fee - per Rateable Band</u>			
Band A	100.00	100.00	0.00%
Band B	190.00	190.00	0.00%
Band C	315.00	315.00	0.00%
Band D	450.00	450.00	0.00%
Band E	635.00	635.00	0.00%
Band D X (2)	900.00	900.00	0.00%
Band E X (3)	1,905.00	1,905.00	0.00%
<u>Main Annual Charge</u>			
Band A	70.00	70.00	0.00%
Band B	180.00	180.00	0.00%
Band C	295.00	295.00	0.00%
Band D	320.00	320.00	0.00%
Band E	350.00	350.00	0.00%
Band D X (2)	640.00	640.00	0.00%
Band E X (3)	1,050.00	1,050.00	0.00%
<u>Variation</u>			
Band A	100.00	100.00	0.00%
Band B	190.00	190.00	0.00%
Band C	315.00	315.00	0.00%
Band D	450.00	450.00	0.00%
Band E	635.00	635.00	0.00%
<u>Personal Licences, Temporary Events and Other Fees</u>			
Application for a grant or renewal of personal licence	37.00	37.00	0.00%
Temporary event notice	21.00	21.00	0.00%
Theft, loss etc. of premises licence or summary	10.50	10.50	0.00%
Application for a provisional statement where premises being built etc.	varies	varies	
Notification of change of name or address	10.50	10.50	0.00%
Application to vary licence to specify individual as premises supervisor	23.00	23.00	0.00%
Application for transfer of premises licence	23.00	23.00	0.00%
Theft, loss etc. of certificate or summary	10.50	10.50	0.00%
Notification of change of name alteration of rules of club	10.50	10.50	0.00%
Change of relevant registered address of club	10.50	10.50	0.00%
Theft, loss etc. of temporary event notice	10.50	10.50	0.00%
Theft, loss etc. of personal licence	10.50	10.50	0.00%
Duty to notify change of name or address	10.50	10.50	0.00%
Right of freeholder etc. to be notified of licensing matters	21.00	21.00	0.00%
Interim Authority notice following death etc. of licence holder	23.00	23.00	0.00%
<u>Fees for Scrap Metal Dealers Act 2013 scrap metal licence applications and incidental costs</u>			
Scrap metal dealer site licence application fee	350.00	350.00	0.00%
Scrap metal dealer site licence renewal fee	250.00	250.00	0.00%
Scrap metal dealer site licence variation fee	90.00	90.00	0.00%
Scrap metal dealer collector licence fee	250.00	250.00	0.00%
Scrap metal dealer collector renewal fee	230.00	230.00	0.00%
Scrap metal dealer collector variation fee	90.00	90.00	0.00%
Replacement licence	30.00	30.00	0.00%
<u>Fees for Mobile Homes Act 2013 licence applications and incidental costs</u>			
Application	250.00	250.00	0.00%
Annual fee 2 to 10 residential units	150.00	150.00	0.00%
Annual fee 11 to 30 residential units	220.00	220.00	0.00%
Annual fee 31+ residential units	300.00	300.00	0.00%
Compliance notice	335.00	335.00	0.00%
Transfer of licence	72.00	72.00	0.00%
Variation of licence	215.00	215.00	0.00%
Fees only apply to relevant mobile homes sites. If exempt, licence fee Enil, no annual fee, compliance notices do not apply and transfer or variation fees Enil.			

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
<u>Licensed premises gaming machines permits:</u>			
Grant	150.00	150.00	0.00%
Existing operator grant	100.00	100.00	0.00%
Variation	100.00	100.00	0.00%
Transfer	25.00	25.00	0.00%
Annual fee	50.00	50.00	0.00%
Change of name	25.00	25.00	0.00%
Copy of permit	15.00	15.00	0.00%
<u>Licensed premises automatic notification process</u>			
On Notification	50.00	50.00	0.00%
<u>Club gaming permits</u>			
Grant	200.00	200.00	0.00%
Grant (club premises certificate holder)	100.00	100.00	0.00%
Existing operator grant	100.00	100.00	0.00%
Variation	100.00	100.00	0.00%
Renewal	200.00	200.00	0.00%
Renewal (club premises certificate holder)	100.00	100.00	0.00%
Annual fee	50.00	50.00	0.00%
Copy of permit	15.00	15.00	0.00%
<u>Club machine permits</u>			
Grant	200.00	200.00	0.00%
Grant (club premises certificate holder)	100.00	100.00	0.00%
Existing operator grant	100.00	100.00	0.00%
Variation	100.00	100.00	0.00%
Renewal	200.00	200.00	0.00%
Renewal (club premises certificate holder)	100.00	100.00	0.00%
Annual fee	50.00	50.00	0.00%
Copy of permit	15.00	15.00	0.00%
<u>Family entertainment centre gaming machine permits</u>			
Grant	300.00	300.00	0.00%
Renewal	300.00	300.00	0.00%
Existing operator grant	100.00	100.00	0.00%
Change of name	25.00	25.00	0.00%
Copy of permit	15.00	15.00	0.00%
<u>Prize gaming permits</u>			
Grant	300.00	300.00	0.00%
Renewal	300.00	300.00	0.00%
Existing operator grant	100.00	100.00	0.00%
Change of name	25.00	25.00	0.00%
Copy of permit	15.00	15.00	0.00%
<u>Converted Casino</u>			
Non-conversion provisional statement	no charge	no charge	
Non-conversion application	no charge	no charge	
1st Annual fee	2,400.00	2,400.00	0.00%
Annual fee	2,400.00	2,400.00	0.00%
Vary licence	1,600.00	1,600.00	0.00%
Transfer licence	1,080.00	1,080.00	0.00%
Reinstatement of licence	1,080.00	1,080.00	0.00%
Provisional	no charge	no charge	
<u>Bingo</u>			
Non conversion provisional statement	960.00	960.00	0.00%
Non conversion application	2,800.00	2,800.00	0.00%
1st annual fee	800.00	800.00	0.00%
Annual fee	800.00	800.00	0.00%
Vary Licence	1,400.00	1,400.00	0.00%
Transfer Licence	960.00	960.00	0.00%
Reinstatement of licence	960.00	960.00	0.00%
Provisional	2,800.00	2,800.00	0.00%
<u>Adult Gaming Centre</u>			
Non conversion provisional statement	960.00	960.00	0.00%
Non conversion application	1,600.00	1,600.00	0.00%
1st annual fee	800.00	800.00	0.00%
Annual fee	800.00	800.00	0.00%
Vary licence	800.00	800.00	0.00%
Transfer licence	960.00	960.00	0.00%
Reinstatement of licence	960.00	960.00	0.00%
Provisional	1,600.00	1,600.00	0.00%
<u>Track betting</u>			
Non conversion provisional statement	790.00	790.00	0.00%
Non conversion application	2,050.00	2,050.00	0.00%
1st annual fee	830.00	830.00	0.00%
Annual fee	830.00	830.00	0.00%
Vary licence	1,050.00	1,050.00	0.00%
Transfer Licence	790.00	790.00	0.00%
Reinstatement of licence	790.00	790.00	0.00%
Provisional	2,100.00	2,100.00	0.00%

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
Betting (other)			
Non conversion provisional statement	1,000.00	1,000.00	0.00%
Non conversion application	2,500.00	2,500.00	0.00%
1st annual fee	500.00	500.00	0.00%
Annual fee	500.00	500.00	0.00%
Vary licence	1,250.00	1,250.00	0.00%
Transfer licence	1,000.00	1,000.00	0.00%
Re-instatement of licence	1,000.00	1,000.00	0.00%
Provisional	2,500.00	2,500.00	0.00%
Family Entertainment Centre			
Non conversion provisional statement	790.00	790.00	0.00%
Non conversion application	1,650.00	1,650.00	0.00%
1st annual fee	625.00	625.00	0.00%
Annual fee	625.00	625.00	0.00%
Vary licence	830.00	830.00	0.00%
Transfer licence	790.00	790.00	0.00%
Re-instatement of licence	790.00	790.00	0.00%
Provisional	1,650.00	1,650.00	0.00%
Temporary Use Notices	500.00	500.00	0.00%
Copy of Licences	25.00	25.00	0.00%
Notification of Change of Licence	50.00	50.00	0.00%
Hackney Carriages			
Vehicle Licence			
Vehicle Licence- New (valid for one year)	200.00	200.00	0.00%
Vehicle Licence- Renewal (valid for one year)	190.00	190.00	0.00%
Vehicle Licence- if vehicle six years + (valid for 6 months)	100.00	100.00	0.00%
Transfer of Vehicle Licence	190.00	190.00	0.00%
Replacement Vehicle Plate	20.00	20.00	0.00%
Replacement Vehicle Plate Bracket	10.00	10.00	0.00%
DBS checks	50.00	50.00	0.00%
Knowledge Test	40.00	40.00	0.00%
DVLA check	10.00	10.00	0.00%
Transfer of Proprieter	10.00	10.00	0.00%
Vehicle Safety Check (Carried out by Rugby Borough Council Work Services)	50.00	50.00	0.00%
Vehicle Safety Check cancellation fee	10.00	10.00	0.00%
Operator's Licence:			
New Applications (valid for 5 years):			
1-4 Vehicles	790.00	790	0.00%
5-9 Vehicles	860.00	860	0.00%
10-19 Vehicles	970.00	970	0.00%
20+ Vehicles	1,130.00	1130	0.00%
Application Renewal (valid for 5 years)			
1-4 Vehicles	790.00	790	0.00%
5-10 Vehicles	860.00	860	0.00%
10 or more Vehicles	970.00	970	0.00%
20+ Vehicles	1,130.00	1130	0.00%
Driver's Licence - Dual Hackney and PHV Licence:			
New Application (Valid for 3 years)	480.00	480.00	0.00%
Application Renewal (Valid for 3 years)	480.00	480.00	0.00%
Transfer of Vehicle Licence	190.00	190.00	0.00%
Replacement Vehicle Plate	20.00	20.00	0.00%
Replacement Vehicle Plate Bracket	10.00	10.00	0.00%
Knowledge Test	40.00	40.00	0.00%
Replacement Operators License	10.00	10.00	0.00%
Transfer of Proprieter	10.00	10.00	0.00%
Replacement of Dual Drivers License/PHV License (Badge)	20.00	20.00	0.00%
Vehicle Safety Check (Carried out by Rugby Borough Council Work Services)	50.00	50.00	0.00%
Vehicle Safety Check cancellation fee	10.00	10.00	0.00%
Street Trading			
Street Trading License Application Cost	0.00	157.00	0.00%
Street Trading License Application License Cost	0.00	848.00	0.00%
Mobile License Annual Application Cost	0.00	157.00	0.00%
Mobile License Annual Application License Cost	0.00	552.00	0.00%
Temporary 7 day License Application Fee	0.00	157.00	0.00%
Temporary 7 day License Application License Fee	0.00	159.00	0.00%
Special Event Application Cost	0.00	91.00	0.00%
Special Event License Cost	0.00	23.00	0.00%
Fees do not include any electrical charges (these will be charged separately)			

Fees and Charges Schedule 2026-27					
	Current Fee 2025/26		PROPOSED Fee 2026/27		% increase
Car Parking					
Off Street Parking					
John Barford Car Park					
Up to 3 hours	1.00		1.00		0.00%
Up to 5 hours	2.50		2.50		0.00%
Up to 11 hours	5.00		5.00		0.00%
Sunday	1.00		1.00		0.00%
Railway Terrace/Gas Street/Old Market Place					
Up to 3 hours	1.00		1.00		0.00%
Up to 5 hours	4.00		4.00		0.00%
Up to 11 hours	10.00		10.00		0.00%
Sunday	no charge		no charge		
Chestnut Field/North Street/Little Church Street/Evreux Way					
Up to 2 hours	1.00		1.00		0.00%
Up to 3 hours	1.30		1.30		0.00%
Sunday	1.00		1.00		0.00%
Westway					
Up to 5 hours	2.50		2.50		0.00%
Up to 11 hours	5.00		5.00		0.00%
Sunday	no charge		no charge		
Newbold Road					
Up to 3 hours	1.00		1.00		0.00%
Up to 5 hours (weekdays only)	4.00		4.00		0.00%
Up to 11 hours	10.00		10.00		0.00%
Saturday up to 11 hours	3.00		3.00		0.00%
Sunday	no charge		no charge		
Penalty Charges					
Penalty charge	50.00 or 70.00		50.00 or 70.00		0.00%
Penalty charge if paid within 14 days	25.00 or 35.00		25.00 or 35.00		0.00%
Season Tickets - Day Passes					
John Barford/Westway					
3 months	120.00		120.00		0.00%
6 months	215.00		215.00		0.00%
Yearly	400.00		400.00		0.00%
Railway Terrace/Gas Street/Old Market Place					
3 months	180.00		180.00		0.00%
6 months	325.00		325.00		0.00%
Yearly	615.00		615.00		0.00%
Other Charges					
Vehicles over 3 tonnes/Coaches	not permitted		not permitted		
Caravan/trailers and towing vehicles used for exhibitions, trade etc. (per space)	10.00		10.00		0.00%
Enforcement Charges					
Fixed Penalty Fines					
The Council has, where possible, determined to set its own level of fines within the standard range of penalties. The general formula is adopted to set the default penalty level to be the maximum possible within the range for that offence. However, this penalty is DISCOUNTED to the minimum penalty possible within the range, IF the penalty is paid within 10 days in the case of Public Space Protection Orders and Fly tipping, and 7 days for all other listed offences.					
	Fixed Penalty	Maximum	Fixed Penalty	Maximum	
Depositing Litter*	80.00	2,500.00	80.00	2,500.00	0.00%
*reduced to £50 if paid within 7 days					
Graffiti and fly posting	80.00	2,500.00	80.00	2,500.00	0.00%
Nuisance parking	100.00	2,500.00	100.00	2,500.00	0.00%
Fly tipping	400.00	unlimited	400.00	unlimited	0.00%
Exposing vehicles for sale on a road	100.00	2,500.00	100.00	2,500.00	0.00%
Repairing vehicles on a road	100.00	2,500.00	100.00	2,500.00	0.00%
Abandoning a vehicle	200.00	2,500.00	200.00	2,500.00	0.00%
Unauthorised distribution of free printed matter	80.00	2,500.00	80.00	2,500.00	0.00%
Failure to furnish documentation (Waste Carriers Licence)	300.00	unlimited	300.00	unlimited	0.00%
Failure to produce authority (Waste Transfer Note)	300.00	unlimited	300.00	unlimited	0.00%
Failure to comply with a Public Space Protection Order*	100.00	2,500.00	100.00	2,500.00	0.00%
*reduced to £75 if paid within 10 days					
*Failure to comply with a Community Protection Notice (Individual)	100.00	2,500.00	100.00	2,500.00	0.00%
*reduced to £ 50 if paid within 10 days					
Failure to comply with a Community Protection Notice (Business)	100.00	unlimited	100.00	unlimited	0.00%
Failure to comply with noise warning notice (licenced)	500.00	unlimited	500.00	unlimited	0.00%
Failure to comply with a Public Space Protection Order (Dogs)*	100.00	1,000.00	100.00	1,000.00	0.00%
*reduced to £ 50 if paid within 10 days					

Fees and Charges Schedule 2026-27					
	Current Fee 2025/26		PROPOSED Fee 2026/27		% increase
Landlords					
Implementation of the Smoke and Carbon Monoxide Alarm (England) Regulations 2015 on 1st April 2015 will result in penalty charges being issued against landlords where they have breached their legal duties in relation to offences under the regulations which require landlords to provide smoke alarms and carbon monoxide alarms in rented properties:					
	Charges Imposed	If Paid Within 14 Days	Charges Imposed	If Paid Within 14 Days	
First Offence	1,000.00	750.00	1,000.00	750.00	0.00%
Second Offence	2,000.00	n/a	2,000.00	n/a	0.00%
Third Offence (and all Consequent Offences)	5,000.00	n/a	5,000.00	n/a	0.00%
Officer Rates					
For reclaiming officer costs when investigating matters that result in a legal proceeding being instituted etc.					
Category A - salary grade D and below	59.50		61.80		3.87%
Category B - salary grade E to F	78.40		81.40		3.83%
Category C - salary grade G	100.20		104.00		3.79%
Category D - Heads of Service or above	119.20		123.70		3.78%
Administration charges for works in default etc.:					
For each property or person responsible, minimum fee to apply until hourly rate and associated costs exceed this figure					
	72.20		74.90		3.74%
Any associated letters, reports etc.	15.20		15.80		3.95%
Officers statement for solicitors (minimum 1 hour)	officer rates		officer rates		
Mileage charged at current casual user rates					
Note: Fees and Charges marked with an asterisk "*" are set by national legislation and will be amended as and when specified charges are amended					
Communities and Homes					
Housing Services					
Private Housing Inspection and Assessment for Immigration and other purposes	250.00		259.50		3.80%
House in Multiple Occupation Licence fee (valid for 5 years):					
Where Landlord approaches Council:					
1-6 occupants	1362.00		1,362.00		0.00%
7-11 occupants	1556.00		1,556.00		0.00%
12+ occupants	1694.00		1,694.00		0.00%
Surcharge where Landlord is found to be running an unlicensed HMO (in addition to relevant application fee)	900.00		934.20		3.80%
Renewal of an HMO Licence (valid for 5 years)	1177.00		1,177.00		0.00%
Copy of Licence	34.60		35.90		3.76%
Variation of Licence	208.50		216.40		3.79%
Revoking licence	208.50		216.40		3.79%
Service of Hazard awareness notice					
Service of formal notice/order	639.70		664.00		3.80%
Additional notices/orders for multiple hazards	64.10		66.50		3.74%
DBS check	50.00		50.00		0.00%
Public Registers and Other Information					
All public registers can be viewed in person free of charge and attempts are being made to make some or all of these available on the internet.					
Contaminated land and pollution searches	Price on application		Price on application		
Complete copies of list of Registered Food Premises	320.00		320.00		0.00%
Partial copies of the list of Registered Food Premises	0.00		0.00		0.00%
Copies of or from other Public Registers:					
Complete premises files (printed, plus photocopying charge)	40.00		40.00		0.00%
Partial extracts from premises file (per request, plus copying)	20.00		20.00		0.00%
Printed copies of Air Quality Assessment Reports etc	51.00		51.00		0.00%
Information may be available in an electronic format. Prices available on request.					
Operations and Traded Services					
Bulky Waste Service					
Bulky Waste Collection - up to 3 items	35.00		40.00		14.29%
Each Additional Item:					
Up to a maximum of 6	7.00		5.00		-28.57%
Over 6 household items or any number of garden items (sheds, play equipment)	price on application				
Cancellation Fee	5.00		10.00		100.00%
Garden Waste Service					
Domestic Garden Waste Collection (annual subscription)- charge per bin	46.00		46.00		0.00%
Trade Waste					
Trade Waste	price on application				
Emptying of Litter/Dog Waste Bin not on the Public Highway	3.00 per bin per empty		3.5 per bin per empty		16.67%
Street Cleansing Service					
Minor Road Closures	price on application		price on application		
Event Bin Hire	price on application		price on application		
Post Event Clearance	price on application		price on application		
Private Road/Carpark Sweeping	price on application		price on application		

Fees and Charges Schedule 2026-27			
	Current Fee 2025/26	PROPOSED Fee 2026/27	% increase
COMMUNITIES & HOMES			
Welfare Services			
Replacement access fobs	15.30	15.90	3.92%
Lifeline Personal Alarm Service - weekly charge	5.60	5.80	3.57%
Easy Press Adaptor Pendant (one off cost)	10.50		-100.00%
Replacement Lifeline Pendant (one off cost)	62.64	65.00	3.77%
Fall Detector (one off cost)	100.00	103.80	3.80%
GSM Sim Card	1.20	1.20	0.00%
<i>NOTE: Some residents may qualify for a VAT exemption.</i>			
Housing Services			
Housing Guest Bedroom Charges (Including VAT)	17.90	17.90	0.00%
FINANCE, PERFORMANCE, LEGAL AND GOVERNANCE			
Legal Services			
Copy Document – S106 Agreement: Bilateral Agreement or Unilateral Undertaking*	79.00	82.00	3.80%
Copy Document – S106 Agreement: Supplemental Deed or Deed of Variation*	41.00	42.60	3.90%
Copy Document – TPO*	41.00	42.60	3.90%
Ex-Council House Consent	79.00	82.00	3.80%
Ex-Council House Consent: Retrospective	116.90	121.30	3.76%
Copy Document – Lease or Shared Ownership Lease	78.20	81.20	3.84%
Copy Document – Enforcement Notices	23.40	24.30	3.85%
Copy Document – Smoke Control Order	38.70	40.20	3.88%
Ex-Council House Deed of Postponement	79.00	82.00	3.80%
Ex-Council House Letter of Compliance	79.00	82.00	3.80%
Leasehold Enquiries	116.90	121.30	3.76%
Certificate of Existence	16.30	16.90	3.68%
* Standard turnaround for copies is 1-3 working days. However, if any of the above documents require expediting straight away, an additional £30.00 is added to each.			
Copy documents will be emailed out to customers where possible. A number of copy documents are available on the Council's publicly accessible registers and customers are requested to check these registers prior to making a request for a copy document. Where the Council has already scanned a copy document in and holds an electronic version that can be emailed to the customer, an administration charge of £15 will be made rather than the fee shown above.			
S106 Agreements			
Minor (1-2 obligations)	0.00	1,647.00	0.00%
Major (3+ obligations)	0.00	2,983.00	0.00%
Complex Matters	0.00	Up to 2,983.00	0.00%
*this includes; major developments, multiple planning obligations/multiple land interests and trigger payments			
**Any additional work required up to completion will continue at an hourly rate of £265			
Deed of variations	0.00	1,647.00	0.00%
Unilateral undertakings	0.00	1,647.00	0.00%
Electoral Services			
The Open Electoral Register can be purchased in either data or paper form:-			
Fee for data copy £20.00 plus £1.50 for every 1,000 entries or part thereof purchased			
Fee for paper copy £10.00 plus £5.00 for every 1,000 entries or part thereof purchased			
EXECUTIVE DIRECTOR			
Freedom of Information and Environmental Information Regulation requests are charged for in just two cases:-			
- where the cost of answering the enquiry goes over £450; and			
- where there are costs for preparing the information e.g. printing, photocopying, postage, providing information in other formats (CD-ROM, audio cassette, translation)			
The time spent dealing with the above is calculated at £25 per hour.			
With the majority of requests the costs will be less than £450 and we will make no charge for the work involved.			
If however, the cost of dealing with your request goes over £450 we will contact you to discuss the information you have requested and the cost of providing it. If you still want the information in a format that is going to take the cost over that limit, then we will charge you the full amount.			
- Photocopying or printing material;			
- Postage;			
- Producing material in a different format when requested e.g. CD Rom, audio cassette;			
- Providing extracts of databases;			
- Translating the material into a different language where requested;			
- Allowing you to reasonable time to inspect a record containing the information (FOI only);			
- 10p per A4 sheet for printing or photocopying, black and white;			
- 20p per A3 sheet for printing of photocopying, black and white;			
- 92p per A4 sheet for printing or photocopying, colour;			
- £1.24 per A3 sheet for printing or photocopying, colour;			
- Postage costs - documents will be sent by second class mail unless specified otherwise;			
- Any costs involving staff time will be charged at £25 per hour.			
We can charge for these costs in all cases, whether or not we can also charge for the prescribed costs.			
If the total cost is less than £10, there is no charge.			