Response to Rugby's Preferred Option Consultation

The revised NPPF confirms[1] that the planning system continues to be based on three overarching objectives, one of which is Environmental Objective. This objective includes the need to move to a low-carbon economy. The planning system should support the transition to net-zero by 2050 and should[2] "*shape places in ways that contribute to **radical** reductions in greenhouse gas emissions*". These Government policies should be implemented through the preparation and implementation of plans.

Failure to Reduce Greenhouse Gas Emissions

Rugby's Preferred Option fails to meet these requirements and does not comply with Government policy. The evidence base on Climate fails to provide a sound basis to support the proposed plan. At the time of writing, the 'Net Zero Evidence' is stated to be 'forthcoming'. Lack of robust evidence for such a vital aspect of the proposals invalidates the current consultation.

There is no evidence that the Plan's stated objective (Objective 3) to **reduce emissions** has been addressed adequately. The NPPF specifies[3] that plan-making should mitigate climate change by making effective use of land in urban areas with new development helping to reduce greenhouse gas emissions through its location (among other factors). The proposed spatial strategy fails to comply with national policy.

The Proposed Dispersed Spatial Strategy is Counter-Productive

A Dispersed spatial strategy has been chosen as the Preferred Option. This is outlined[4] as having 70% of new housing located in the Rugby urban area (or "at least 75%" in the proposed Plan if existing commitments are included). A strategy proposing 25-30% of new development in rural locations is significantly less sustainable than one that concentrates built development in the main urban area. The justification given[5] for choosing the dispersed strategy is that it would offer small and medium sites in order to provide opportunities for SME builders. There is no evidence to justify providing greenfield sites in rural villages instead of identifying small and medium sites on brownfield land.

The Sustainability Appraisal ('SA') repeats the SME builder assertion, suggesting there is a case for exploring the possibility of a dispersed strategy. But there is no evidence to support the amount proposed (25-30%) of housing development in rural areas. The SA examines five alternative growth scenarios[6] but all five include constant development in the villages of Clifton

[1] Paragraphs 8 and 9 in the NPPF dated December 2024
[2] Paragraph 161 in the NPPF (with my added emphasis)
[3] NPPF paragraphs 11a) and 164b)
[4] Presentation to Cabinet on 4 March 2025, section 9
[5] Presentation to Cabinet on 4 March 2025, paragraph 9.4(i)
[6] Sustainability Appraisal Table 5.2

on Dunsmore, Dunchurch, Ryton on Dunsmore, Stretton on Dunsmore and Wolvey. Smaller villages of the so-called Main Rural Settlements are the least sustainable but some have been included consistently in all scenarios. This is not justified.

In fact, there is evidence that providing sites in rural villages would **fail** to deliver the claimed benefits of the Dispersed spatial strategy. For example, consider the proposed Site 134, north of Plott Land in Stretton on Dunsmore. This site is next to a site in Squires Road allocated in the current Local Plan (Policy DS3.9) which is being developed by Taylor Wimpey. Taylor Wimpey states that it has an option with the landowner of Site 134 to develop it as a "*natural extension of the existing residential allocation in the Rugby Local Plan*". Taylor Wimpey is not an SME builder. A spatial strategy in a local plan can neither determine which commercial enterprises should build houses or their rate of building.

Like several of the so-called Main Rural Settlements, Stretton on Dunsmore has a shop, a GP surgery, a pub and a primary school and has a few buses a day but this does not make it sustainable to anything like the degree of the main urban area. Stretton has poor access by non-car modes and remains extremely car dependent. The SA confirms[7] that access to Coventry and Rugby is a key consideration even though there is no requirement to provide for unmet need from Coventry. Stretton's proximity to the A45 does not make travel by car sustainable. In fact, village centre congestion, unsuitable minor roads and problematic junctions make Stretton unsuitable for more traffic - key factors recognised in the SA[8].

Despite its recognition[9] that strategic sites generally offer better opportunities than smaller sites to achieve high standards, notably progress towards net-zero, the SA persists in including smaller MRSs in every growth scenario. Development in relatively small MRSs appears to be considered as a foregone conclusion. The NPPF specifies[10] that adverse impacts on environmental objectives should be avoided but the proposed development in rural villages fails to achieve this.

The claimed benefits of the proposed Dispersed spatial strategy are illusory. The relative unsustainability of rural locations is clear. None of the scenarios meet the imperative to make radical reductions in greenhouse gas emissions. The chosen Dispersed strategy is counter-productive in this respect and the proposed spatial strategy is contrary to Government policy.

Green Belt Impact

The chosen Dispersed spatial strategy allocates Green Belt land for development. This would require Green Belt boundaries to be altered and that would require exceptional circumstances. The claim that exceptional circumstances exist is largely based on a misleading claim[11] : "*a*

[7] Sustainability Appraisal, March 2025, paragraph 5.2.54
[8] Sustainability Appraisal paragraph 5.2.65
[9] For example in Sustainability Appraisal paragraph 6.2.20
[10] NPPF paragraph 33
[11] Presentation to Cabinet on 4 March 2025 paragraph 9.7

pattern of concentrating housing on a further very large site, with no more housing allocated in the borough's main rural settlements except for the non-Green Belt villages of Clifton-upon-Dunsmore and Dunchurch does not represent a sustainable pattern of development." As described above, the Sustainability Appraisal **assumes** development in the Green Belt in **all its housing scenarios**. The assertion that dispersing development in villages in the Green Belt is more sustainable than concentrating development in larger sites is contradicted in the SA.

The decision to choose the Dispersed spatial strategy appears to discount the large majority of the public against such an approach. The report on the Issues and Options Consultation shows that the great majority of respondents considered there were **no exceptional circumstances to justify amending Green Belt boundaries**.

The following sites are all in the Green Belt in Stretton on Dunsmore, outside the established village boundary.

Site 6

This very small site on Fosse Way in Stretton on Dunsmore is estimated to accommodate just three dwellings. Inclusion of this site is not consistent with the process described in the SA[12], which claims that site submissions that are too small to meet the HELAA minimum size threshold have been eliminated from the residential site allocations. The HELAA[13] confirms that sites with capacity for fewer than 5 dwellings should not be included, consistent with the PPG. This site should be considered as part of the windfall if it comes forward.

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

Houses with fronts on Fosse Way in this location would inevitably have entries opening in the vicinity of this problematic junction, adding to safety concerns. In the past, the Highways Authority have stated that they would not support any new accesses to be created off the Fosse Way due to it being a core component of the County's highway network in a strategic capacity.

Site 6 is in the Green Belt and would be inappropriate development harmful to the purposes of the Green Belt. Currently, this site helps to constrain ribbon development along the Fosse Way. It is located outside the established village boundary on the far side of the Fosse Way from the village centre. If the Green Belt boundary were moved to enable new development on the far

[12] Sustainability Appraisal paragraphs 5.3.4 and 5.4.64
[13] HELAA paragraph 4.6

side of the Fosse, there is no further physical feature available to define a clear and permanent boundary to prevent further encroachment on the countryside. This would not comply with the NPPF[14].

Site 81

This site is described as land west of Fosse Way at Stretton on Dunsmore accessed from the Fosse Way (B4455). The proposed access would be on the bend between Meadow Close and the roundabout connecting Brookside to the Fosse Way. In the past, the Highways Authority have stated that they would not support any new accesses to be created off the Fosse Way due to it being a core component of the County's highway network in a strategic capacity.

The proposal for development of Site 81 emphasises that the vast majority of traffic generated by the development would be to access the A45 and A423. This illustrates that this development would be overdependent on travel by car. Like other proposed developments in rural villages, it has poor sustainability characteristics.

The site extends to 3.5ha and the proposed Plan assumes that 40 dwellings could be built there. It is located outside the established village boundary. The site is in the Green Belt and would be inappropriate development harmful to the purposes of the Green Belt. If the Green Belt boundary were moved to facilitate the proposed new development, there is no further physical feature available to define a defensible boundary to prevent further encroachment on the countryside. This would not comply with the NPPF[14].

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

Site 134

As outlined above, Site 134 is proposed as a large extension to the Squires Road allocation in the current Plan (DS3.9). Taylor Wimpey describes the development of Site 134 as "*a natural extension of the existing residential allocation.*" When considering the merits of the Squires Road development proposed in the current Plan for 47 dwellings, the inspector's report assessed[15] that the proposed new boundary for that development would "*form an effective permanent boundary to the Green Belt at this point*." The fact that Site 134 is now allocated as an extension to its Squires Road development shows that the previous assessment was incorrect - the revised Green Belt boundary is neither effective nor permanent. Site 134 proposed for 120 dwellings would make a much greater incursion into the Green Belt and its boundary would be even less defensible. There is no further physical feature available to define a clear and permanent boundary to prevent further encroachment on the countryside. This would not comply with the NPPF[14].

[14] NPPF paragraph 149f)
[15]Paragraph 189 in Inspector's Report on Rugby Borough Local Plan dated 27 March 2019

The Green Belt currently prevents ribbon development along Plott Lane and safeguards the countryside from encroachment. Site 134 is currently open farmland and its development would extend the western boundary of the settlement into the countryside. It would cause considerable harm to the role and purposes of the Green Belt in this location.

Plott Lane is a narrow rural road unsuitable for a substantial increase in traffic. Even if a section of Plott Lane is improved near the proposed new junction, the rest of the lane is single lane with only informal passing places. Stretton on Dunsmore cannot accommodate such a large development with its traffic impact on village centre congestion, unsuitable minor roads and problematic junctions.

Site 134 was productive agricultural land but a substantial part of it has now been fenced off (against both people and wildlife) as though it was part of the approved development. The NPPF requires planning policies to enhance the natural and local environment, protecting agricultural land for food production and recognising the economic and environmental value of agricultural land[16].

Site 134 is relatively unsustainable and its development would harm the Green Belt. It fails to comply with Government policies.

[16] Paragraph 187b) and footnote 65 in the NPPF