

Rugby Borough Council – Preferred Option Consultation

The Realistic Alternative Plan (RAP)

Introduction

Rugby Borough Council (RBC) is consulting on a new draft local plan (DLP) for our borough and has published this as the Preferred Option Consultation Document.

The RAP is a comment on the DLP which is being promoted by Rugby Borough parish councils and local residents. It seeks to build on and enhance the proposals set out in the DLP.

For planning purposes RBC has a well established settlement hierarchy which was set out as policy CS1 in the Local Development Framework (2011), is set out as policy GP2 in the current local plan (2019) and is proposed as policies S1 and S5 in the DLP. The hierarchy set out in CS1 was:

- (1) Rugby Town Centre;
- (2) Rugby;
- (3) Main Rural Settlements;
- (4) Local Needs Settlements;
- (5) Countryside; and finally
- (6) Green Belt.

With regard to policy S1 in the DLP we recognise and agree with item 1.2 which states that a settlement hierarchy should be read alongside Policy S5 (Countryside protection) which restricts development outside of settlement boundaries.

The proponents of the RAP believe that there is a broad consensus between RBC, the parish councils and our borough's residents that this is the most appropriate hierarchy. The proponents further believe that this consensus has endured notwithstanding changes in political control of RBC.

All the parties represented on RBC came together in 2019 to declare a Climate Emergency. The settlement hierarchy is part of an appropriate response to the declaration as it seeks to foster settlement in places where there is the least need to travel.

The RAP modifications to the DLP acknowledge the three numerical targets set by His Majesty's Government (HMG) for RBC. The RAP seeks to maintain the DLP's adherence to those policies. The RAP also responds to Warwickshire County Council's acknowledgement of the need to provide an additional secondary school to meet the needs of the North of Rugby catchment area and RBC's ambitions to allocate employment space in the DLP. The RAP also acknowledges that RBC will have to satisfy HMG's Inspector at the Examination in Public that, amongst other things, any new local plan is "sound" in its adherence to the qualitative aspects of HMG's planning policy as set out in the National Planning Policy Framework (NPPF) and other documents. The RAP is informed by the NPPF.

The RAP is primarily a response to concerns raised about the distribution of housing allocations in policy S6 of the DLP. Apart from the strategic policies the DLP contains many development control policies. The RAP acknowledges the work RBC has conducted with regard to those. The RAP seeks

enhancements to policies S1, S2, S5, S6 and I6 of the DLP. As a result of those enhancements there would be consequential changes to S3, S4, S7 and S8.

Proponents of the RAP may have different views on the other policies set out in the DLP and in the development requirements for individual sites. Individual proponents of the RAP will be submitting their own comments on those policies and requirements. Therefore the RAP should not be taken as a comprehensive response to the DLP but just to the policies set out above.

This document should be taken as the definitive version of the RAP. An Excel workbook has been used as a tool for developing the RAP and is provided as part of the consultation response. Extracts from the workbook are used in this document.

As can be seen below the enhancements suggested in the RAP shift the balance of new settlement allocations closer to our borough's established settlement hierarchy. In so doing selecting an approach which is more sustainable and meets "...the most appropriate strategy, when considered against the reasonable alternatives..." test. This test will be used by the Planning Inspector when assessing the plan.

Summary	Preferred Options Consultation Document	Realistic Alternative Plan
Rugby Town Centre	115	534
Elsewhere in Rugby	330	1,506
Main Rural Settlements not in Green Belt	395	85
Other settlements not in Green Belt	25	25
Countryside	745	0
Green Belt	1,728	215
TOTAL	3,338	2,365

Source: Extract from the 'Outcomes' sheet of the RAP workbook version C.1

History

In 1999 the Urban Task Force, which had been established by HMG and chaired by the architect and Labour peer, Lord Rogers of Riverside, published its report *Towards an Urban Renaissance*. Amongst other recommendations the report concluded that development densities should be greatest around transport nodes.

Mirroring the ideas of the Urban Task Force RBC's *Core Strategy* (2011) adopted policy CS1 (see appendix 1) which emphasised that development should be prioritised in the centre of Rugby with its access to the train station and bus routes and severely curtailed in the remoter parts of the borough such as the Green Belt.

That particular emphasis was continued in the policies when the current local plan was first drafted. Its policy GP2 closely followed CS1 save that it did not identify the town centre as a priority for development. The proposed site allocations in the resultant Local Plan did not follow the Urban Task Force/CS1 chain of thought so closely. RBC approved that its draft local plan should be submitted to the Secretary of State in 2017.

An Examination in Public was held in 2018 and the Inspector advised that 183 major modifications had to be made to the plan before it could be considered sound. These modifications would remove housing allocations at Lodge Farm, Churchover (in the countryside) and Brinklow (in the Green Belt).

In his final letter to the Council the Inspector commented on the Council's original draft. With regard to the Lodge Farm proposal he said, inter alia, that "Paragraph 34 of the NPPF expects plans to ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. There is no dispute that a development at this scale would generate significant travel movement. Policy DS10 includes provision for a primary school, GP surgery and a local centre on-site, which would enable some day-to-day trips to be undertaken within the site. Secondary school provision would be met within the SWR allocation, and given that the distance to it from most properties on the Lodge Farm site would be greater than 3 miles, the LEA school bus service would provide transport for most pupils between Lodge Farm and SWR. However, for all other trips, the majority of employment opportunities, and all of the main retail, leisure and other community facilities likely to be accessed by residents of the development, are situated off-site..." (Hayden, 2019, paragraph 128) and "All of the evidence I have read, heard and seen on this issue reinforces my conclusion that Lodge Farm would have relatively poor accessibility, particularly by non-car modes, and in comparison with the other large scale allocations in the Plan. It is not a location where either the need to travel would be minimised or the use of sustainable transport modes can be maximised. Neither does the evidence submitted or my analysis of it above persuade me that Lodge Farm is a location which could be made sustainable in transport terms as expected for significant development in paragraph 17 of the NPPF" (Hayden, 2019, paragraph 138).

All the parties represented on RBC came together in 2019 to declare a Climate Emergency.

Since the CLP was adopted RBC has consistently out-performed its building target, delivering about half as many dwellings again as it planned to – see table A below.

Table A					
<u>House building in our borough compared to target</u>					
Year	Current Local Plan Target	Actual Dwellings Built	Surplus	Surplus as % of Target	
2019/20	663	859	196	30%	
2020/21	663	832	169	25%	
2021/22	663	939	276	42%	
2022/23	663	1,349	686	103%	
2023/24	663	873	210	32%	
TOTALS	3,315	4,852	1,537	46%	
Average annual surplus			307		
<i>Source: RBC Authority Monitoring Report 2023-24</i>					

In December 2022 RBC voted to replace the previously agreed Local Development Scheme with one which prepared a new local plan. A Regulation 18 “issues and options” consultation ran during the winter of 23/24. Papers for the RBC Cabinet meeting of 4 March were released at the end of February 2025 and they contained the DLP. This release immediately stimulated interest in planning matters amongst the residents of our borough. The RBC cabinet voted to adopt the DLP on 4 March and this was followed by the Council on 19 March.

The first version of the RAP was produced at a residents meeting in the Hillmorton Ex-Servicemen’s Club in the evening of 1st April 2025 and it was further developed at a meeting of parish councils held in Wolvey on 22 April 2025.

Limitations

Some of the information necessary to prepare a sound local plan is still missing. Critical amongst this is the Local Highways Authority’s Strategic Transport Assessment (STA). Warwickshire County Council had produced a STA, subsequently amended, at this stage in the production of the last local plan but currently we are unsighted on the county council’s assessment of the transport implications of the DLP.

RBC has produced a Housing and Economic Land Availability Assessment but some of the key sites in the centre of Rugby eg Rounds Gardens have not been included in that assessment although we understand it is RBC’s intention to redevelop this site but at a lower density than historically was the case (meeting Williams/Moran). The area and capacity of these sites have been estimated using a less formal approach.

As new and better information emerges the RAP is likely to change to respond those changes.

The RAP is not intended to be a comprehensive response to the issues raised by the DLP. It only seeks enhancements to the strategic policies (and policy I6) set out in the introduction section.

Neither the DLP or the RAP consider the likely phasing of developments and further work on this is essential before RBC considers submitting its draft local plan to HMG. Such an assessment will ensure that development rates are credible when considered against the linear targets established in both the short and medium term.

HMG’s numeric targets

Just like RBC’s DLP the RAP seeks to meet the three key numeric targets set by HMG viz:

- (a) The housing target of 618 dwellings per annum;
- (b) A plan period of 15 years after adoption (NPPF – paragraph 22); and
- (c) A 5% buffer in housing land supply (NPPF – paragraph 78).

Plan Period

RBC’s Local Development Scheme states that the DLP will be adopted by June 2027 and would then cover a seventeen and three quarter year period to March 2045. There is no doubt that the further ahead we look the more uncertain our predictions will be. The RAP proposes an alternative plan period covering the fifteen year period to June 2042.

The Housing and Economic Development Needs Assessment prepared to support RBC’s DLP contains predictions for a variety of years including 2032, 2041, 2043 and 2050. A search revealed no specific predictions for 2045. Both RBC and the RAP therefore have to use linear interpolation to produce

figures for the end of their chosen periods. The use of linear interpolation is justified by RBC consultants (Iceni, 2024, page 9).

Planning to June 2042 rather than March 2045 looks less far into the future and is therefore less speculative. Such an approach requires less land to be identified which ensure greater flexibility for RBC, balancing the needs of the future while reducing the volume of land that will be subject to allocation with the consequent pressure the development market creates. The period June 2042 to March 2045 would be covered by the next iteration of the local plan which would fall due in June 2032 when the period in question would still be at least ten years in the future.

The period proposed by the RAP is therefore more appropriate than the alternative period currently favoured by RBC and reduces the negative impacts created by further site allocation for demands estimated many years hence.

A second secondary school for the North of Rugby education planning area

Warwickshire County Council's Rugby North education planning area extends from Rugby Town centre in the South to the county's boundary with Leicestershire in the North. Its extension to the West runs along the River Avon to Bretford where it cuts across country to the boundary with the City of Coventry just to the North of Binley Woods. To the East it appears to follow the line of the Clifton Brook until it hits the county boundary with Leicestershire. The total West to East distance is about 16 kilometres. The area covered by the county's Rugby North education area is mainly matched by the priority area for Avon Valley School. Currently Avon Valley School is the only secondary school which sites within the Rugby North education planning area.

This area has a projected shortage of secondary school places and RBC has identified a site at St Thomas Cross to meet this need (policy I6).

The site chosen for the new secondary school sits in countryside in the parish of Newton & Biggin. It lies just over a kilometre away from the eastern boundary of the Rugby North planning area. Here policy GP2 of the CLP states that development will only be permitted within the existing boundary of the village. The site is not within the existing boundary of Newton. The proposed policy S1 in the DLP states that only "limited development" will be permitted in Newton.

The site is marked by ancient ridge and furrow and is crossed South West to North East by the R109 public right of way; Nor' Nor' West to East South East by a high voltage electricity transmission line and West to East by a CEMEX pipeline. It is next to the dangerous St Thomas Cross road junction. There is no bus service to the site. It can only be reached from the majority of its catchment area to the West along Newton Manor Lane. Newton Manor Lane is unlit and has no pavement and has poor sight lines due to its undulating nature. No cycle route is provided to the proposed site. It is not clear if RBC has considered the cost for school transport for this site. The need to provide long term bus transport for a large numbers of pupils could make a best value case for this site unattractive and the carbon footprint poor when its whole life case is considered

The proposed site is therefore considered unsuitable for a secondary school.

Conversely the CLP and the subsequent Coton Park East SPD allocated a site to the West of Great Central Walk for a secondary school. The SPD showed how the development of the surrounding residential allocation would bring bus services and cycle routes to the site. This site is not marked by ridge and furrow, nor is it crossed by high voltage electricity transmission lines, public rights of way or CEMEX pipelines. This site is superior to the one identified in the DLP.

The proponents of the RAP understand that Warwickshire County Council did not take up the opportunity to acquire the secondary school site identified in the CLP. Never-the-less the RAP proposes that this site be re-identified as a secondary school site and any compensation payable to the landowner be met out of the contributions planned by RBC as part of policy I6.

Employment land

In both their 2022 and their 2024 reports on the area of land RBC should allocate for employment the consultants, Icen Projects Ltd, incorporate a substantial buffer. Individual proponents of the RAP may comment on RBC's employment land calculations but for the purpose of the RAP RBC's statement of requirement is taken as a given.

For RBC's plan period of 21 years RBC state they require 1,026,546 square metres of floor space for use classes B2, E(g)(ii) and (iii), and B8. Therefore for the 18.25 years covered by the RAP 892,117 square metres would be required. RBC is allocating 1,231,987 square metres. As well as providing the buffers built into RBC's consultants' figures RBC's allocations provide 389,870 square metres more than is required for the RAP period. That represents a 28% excess.

The RAP's proponents believe there is greater pressure to find housing land than there is to find employment land, as such the proposed allocation of excess land to employment is counter to the needs of Rugby Borough when considered as a whole.

There are three cases in the DLP where an allocation could either be for employment or for housing. In each of these three cases the RAP's proponents believe that the choice ought to be for housing.

The three cases are:

- (a) Land South of Crick Road in Houlton;
- (b) Undeveloped land within the Coton Park East Sustainable Urban Extension; and
- (c) The 'Safeguarded Area' in the SW Rugby Sustainable Urban Extension.

Land South of Crick Road in Houlton

RBC propose that the allocation of this land be changed from employment to housing. The RAP incorporates this proposal.

Undeveloped land within the Coton Park East Sustainable Urban Extension

In 2019 RBC allocated Coton Park East for employment, residential and education. The SDP which was subsequently adopted for this sustainable urban extension also incorporated substantial landscaping particularly along the eastern edge of the allocation.

RBC now propose to depart from the previously agreed policy, DS7, and from the SDP they consulted on and adopted in 2019. Instead RBC propose that the undeveloped land with Coton Park East should be allocated for housing.

The RAP maintains policy DS7 and the SDP for this land.

The 'Safeguarded Area' in the SW Rugby Sustainable Urban Extension

In 2019 RBC believed this area would not need to be allocated before 2031. At that point it was intended that the balance of housing and employment needs would be assessed and the land allocated appropriately. The proponents of the RAP believe that currently there is greater pressure to allocate land for housing than for employment. This is supported by the 389,870 square metres

“excess” allocation in the DLP over and beyond the buffer built into the original calculation of requirements.

At the public meeting RBC organised on 3 April 2025 in Dunchurch their Strategy Development Manager said there was “a genuine choice” between housing and employment for the ‘Safeguarded Area’.

There are two arguments in favour of an employment allocation for this land which the proponents of the RAP are aware of. These arguments are addressed below.

The first argument is that this site could not credibly be developed as the owners of the majority of the ‘Safeguarded Area’, Tritax Big Box, are not interested in housing development. Tritax Big Box is not understood to be a housing developer. However when explaining their business strategy to Cllr Isabelle McKenzie and Richard Allanach on 30 October 2024 Tritax Big Box’s representatives explained that where they had acquired a development site which would not be solely used for employment they would sell the non-employment land to housing developers. Elsewhere within the SW Rugby Sustainable Urban Extension Tritax Big Box are pursuing planning applications for housing viz R18/0995 and R22/0853.

The second argument is that an employment allocation will unlock a 4 hectare area of land which Tritax Big Box do not currently own for conversion into a country park. ‘Country Park’ is not defined in the DLP’s glossary. However if a country park could be achieved on that land it could surely also be achieved on the 14.6 hectare allocation of public open space which a housing allocation would unlock. Thus a country park is not a unique benefit which would be conferred by an employment allocation.

Residual buffer

Even after all three sites are allocated for housing and not for employment there would still be a residual buffer of 94,820 square metres (11%) over and above RBC’s calculation of need (which themselves contain a substantial buffer).

Potential housing sites in central Rugby

Just as in policy CS1 of the old ‘Core Strategy’ and in line with the Urban Task Force’s thinking the proponents of the RAP believe the centre of Rugby should be the starting point for investigating development potential. For this purpose, the High Access Zone has been taken as the centre of Rugby.

NPPF paragraph 72 distinguishes between the need to have specific deliverable sites for calculating a LPA’s five-year land supply and the requirements for estimating a LPA’s land supply over the remaining ten years of a local plan. During the later years of a plan “broad locations” can identify development potential. A lower level of precision is required for the final ten years of any proposed local plan.

RBC introduced the concept of probability into assessing housing land supply with its ‘Issues and Options’ consultation where it included the assumption that sites with planning permission had a 95% chance of development. It continued with probability estimates with its DLP which is under-

pined by an assumption that sites with planning permission have a 90% chance of development. The RAP assigns probabilities to key sites within the High Access Zone.

In March 2025 RBC published its assessment of the development potential of ten key sites in the High Access Zone. This has been the starting point for assessing the potential for housing development but additional sites for development have also been identified.

The RAP incorporates RBC's judgement on the Albert Street and Morgan Sindall sites.

Draft policy C1 states that "Development up to 2045 in Rugby town centre ... will include the redevelopment of Rugby Central Shopping Centre to restore street-based, mixed-use development However RBC's housing projections assume that this policy will not generate any dwellings before 2045. RBC have approved planning application R22/0657 for this site which would generate 216 dwellings. In March RBC said that this site was suitable, achievable and available. The RAP assigns a modest 20% probability to this site being redeveloped before 2042.

Draft policy C1 continues to state that the development of Rugby town centre will include "... a new apartment living quarter in the Station Gateway character area surrounding Rugby Station". Again RBC's housing projections assume that this policy will not generate any dwellings before 2045. Five sites fall within the "apartment living quarter". The RAP adopts RBC's assessment that the Stagecoach Bus Depot and the Royal Mail Sorting Office are unavailable. Between the Bus Depot and Charolais Gardens lies another site which RBC estimate has the potential for 41 dwellings. RBC name this site as the Stagecoach car park. It is not clear that this site has ever been used as a car park by Stagecoach. It used to hold a snooker hall and was subsequently a builder's merchants yard. RBC state that this site is both suitable and achievable for housing development but that it was unavailable. The fact that it was advertised for sale in March 2025 strongly suggests that it is available. The RAP assigns a 50% probability to its development before 2042. With regard to Myson House RBC assess that this site is suitable, achievable and available. The planning committee have resolved to approve planning application R22/1035 for the provision of 120 dwellings. The RAP assigns a 70% probability to this site being developed to that density before 2042. Finally we have the Mill Road Car Park. RBC assess that this site is suitable for housing and housing could be achieved. They estimate the capacity of the site to be 126 dwellings. Looking over the five sites which provide car parking for the rail station there clearly is excess capacity – how this will resolve itself in the future is unknown. The RAP assigns a 20% probability to the development of this site before 2042.

The CEMEX site has potential as a housing site but is currently the subject of a planning application to provide a supermarket. The RAP assigns a zero per cent chance that this site will be developed for housing before 2042.

RBC assess that the Westway Car Park could provide 26 dwellings. They say the site is suitable, achievable and available. It is owned by RBC. The RAP assigns an 85% probability that it will be developed for housing before 2042.

The RAP has also assessed sites that RBC has not yet included.

Rounds Gardens is owned by RBC and has an existing housing permission. In the absence of an assessment from RBC the RAP assumes a capacity of 170 and a probability of development before 2042 of 85%.

Just to the North of Rounds Gardens lies a former GEC site. This is a heavily constrained site. It was the subject of planning application R24/0111 for 115 dwellings. This application was refused. To

allow for the site constraints the RAP has assumed a reduced capacity of 60 dwellings and a 50% probability of development before 2042.

The Herbert Grey College site would appear to have the capacity for some 70 dwellings. Although initially discounted for C3 purposes by RBC at RBC's public meeting in Clifton on Dunsmore on 7 April the Strategy Development Manager stated that this site was now being reconsidered. The RAP assumes a probability of development before 2042 of 50%.

This does not exhaust the town centre's potential. During the course of preparation of the RAP other potential sites such as the former snooker club on Railway Terrace were brought to our attention. Another intriguing site is that of the Town Hall. HMG wish to abolish all local authorities outside London with a population of less than half a million. Rugby Borough's population falls well short of half a million and thus we must assume that HMG will abolish it and thus leave the Town Hall redundant. This might throw up a site with a potential for 130 dwellings. The RAP has not taken this potential into account.

A summary of the judgements embedded in the RAP is provided overleaf in table B.

Table B				
<u>Development capacity in central Rugby before 2042</u>				
		Assumed Capacity (Dwellings)	Assumed Probability of develop't before 2042	Product Dwellings
Included in RBC's HELAA				
Westway car park		26	85%	22
Stagecoach car park		41	50%	21
Rugby Central		216	20%	43
Myson House		120	70%	84
Mill Road Car Park		126	20%	25
Not included in HELAA				
Rounds Gardens		170	85%	145
GEC site North of Rounds Garde		60	50%	30
Herbert Grey College		70	70%	49
TOTAL		1,263		419
<i>Source:</i>				
<i>Central Rugby Sites sheet of the RAP Excel Workbook Version C</i>				

Windfall sites

Developers continue to identify sites which have not been identified in the CLP, apply for and are granted planning permission. At the point at which the DLP was published there was a stock of 679 such sites which had yet to be built on. Other sites have been identified after the CLP was approved and have subsequently been built. The proponents of the RAP do not yet have a comprehensive list of these sites but do know that they include the Charolais Gardens site. This means that a minimum of sites for 1,039 dwellings outside the CLP allocations have been discovered. Thus in the five and three quarter years since the CLP was approved there has been an annual discovery rate of 181 dwellings.

The DLP assumes that this rate will now fall to 50 dwellings per annum.

As can be seen above the RAP assumes that an average of 28 dwellings per annum will come forward from significant sites in the High Access Zone.

Additionally the RAP assumes that sites for 70 dwellings per annum will come forward from other sources. This provides a total annual discovery rate of 98. This is significantly less than the minimum

rate of 181 dwellings per annum observed over the last five and three quarter years. The RAP assumption can therefore be regarded as both credible and cautious.

The rest of Rugby Town

The RAP incorporates RBC's proposals for dwellings in the Houlton sustainable urban extension, maintains the allocation for housing in policy DS7 of the CLP and the Coton Park East SPD and makes the choice for housing for the 'Safeguarded Area' in the SW Rugby sustainable urban extension. The RAP also assumes that eventually RBC will identify an alternative site for rugby pitches that would make the Old Laurentians site viable.

Main Rural Settlements

The significant allocations at Brinklow, Clifton-on-Dunsmore, Long Lawford, Stretton and Wolvey would lead to exactly the same situation that HMG's Inspector identified in 2019. Whilst [existing] "provision for a primary school, GP surgery and a local centre on-site, which would enable some day-to-day trips to be undertaken within the site. ... However, for all other trips, the majority of employment opportunities, and all of the main retail, leisure and other community facilities likely to be accessed by residents of the development, are situated off-site..." (Hayden, 2019, paragraph 128) and "All of the evidence I have read, heard and seen on this issue reinforces my conclusion that ... [the site]... would have relatively poor accessibility, particularly by non-car modes... [They are] ... not a location where either the need to travel would be minimised or the use of sustainable transport modes can be maximised". Draft policy CL1 would result in "net zero" housing but draft policy S6 would place the new houses in locations which would generate additional trips and carbon dioxide emissions contrary to RBC's declaration of a Climate Emergency.

Many of the sites chosen by RBC have additional issues with regard to landscape value, habitat value, heritage value and development constraints. Some of the sites would involve the loss of our best and most versatile farmland.

The proponents of the RAP believe that if unamended the DLP has the potential to lead to an Examination in Public where the parish councils using funds from their precepts are contesting RBC. This has the potential to be a wasteful use of public funds.

The adoption of the RAP would lead to a situation where a new draft local plan was not contested by the parish councils at the Examination in Public. Furthermore RBC would not need to spend on producing design codes for Wolvey and Brinklow as currently envisaged in the DLP. The RAP assumes that the savings to RBC are translated into support for parish councils to either produce a neighbourhood plan de novo or to refresh an existing neighbourhood plan.

Rather than imposing sites centrally on Parishes the RAP assumes that the following parish councils will agree to a neighbourhood plan which incorporates 50 to 100 dwellings on sites which are not in the current CLP or subsequent planning permissions. The parish councils affected would be:

Brinklow;

Clifton-on-Dunsmore;

Long Lawford;

Stretton-on-Dunsmore; and

Wolvey.

Ryton-on-Dunsmore is omitted from this list because the DLP already includes a site from the parish's reserved list. Dunchurch has been omitted from the list because of the allocation of the 'Safeguarded Area'. Wolston has been omitted from the list because of the reasons cited in RBC's Sustainability Appraisal.

The RAP assumes that sites for 250 dwellings would be identified through this process.

Other Rural Settlements

Policy S1 states that development in the other rural settlements will be limited.

Therefore the proposal to develop 240 houses in Newton Manor Lane on the far side of Great Central Walk [a clear boundary for urban sprawl] is inappropriate and is not included in the RAP.

With strengthened developer requirements Newton & Biffin parish council are prepared to accept the Hill Crest Farm proposal and the RAP incorporates their judgement.

Countryside

In 2019 HMG's Inspector identified the Rainsbrook Valley as "an area of high landscape sensitivity" which justified its exclusion from the CLP. Mirroring the Inspector's judgement the RAP excludes sites in the Rainsbrook Valley.

Greenbelt

None of the sites currently proposed for the Green Belt are retained in the RAP.

The new or revised neighbourhood plans envisaged for the Main Rural Settlements might lead to sites for 200 dwellings being allocated in the Green Belt. This total might be reduced by the allocation of sites within existing settlement boundaries. Some of the sites identified in the DLP might be incorporated into the neighbourhood plans. The 15 dwelling site proposed for the Green Belt in Wolston is retained in the RAP but an acceptable RAP variant would be Wolston Parish Council opting-in to the neighbourhood plan process.

Summary

A summary of the differences between the Realistic Alternative Plan and the current draft of RBC's Local Plan is shown in the table below.

Summary: RBC plan compared to Realistic Alternative Plan				
		RBC	RAP	Change
	Requirement	12,978	11,279	-1,700
	Delivery			
	SW Rugby	3,990	3,468	-523
	Houlton	3,780	3,285	-495
	Eden Park	664	664	0
	Other allocations	633	633	0
	Other approved sites	679	679	0
	Safeguarded Area	0	885	885
	New allocations	3,338	1,061	-2,277
	Normal windfalls	1,050	1,278	228
	Windfalls from the centre of Rugby	0	419	419
	Total Delivery	14,134	12,371	-1,763
	Buffer	1,156	1,092	-64
	Buffer %	8.9%	9.7%	0.8%

Source: Extract from the 'Summary' sheet of the RAP workbook version C.1

The reduction in delivery in SW Rugby and Houlton in the RAP is because the RAP covers fewer years than the DLP so at a constant build out rate fewer houses will be built during the RAP period, which ends in June 2042, than for the DLP period, which ends in March 2045.

The RAP covers the 15 year period after plan adoption, it allows for 618 dwellings per annum to be delivered and its buffer exceeds 5%. (Therefore minor modifications can be made to the RAP without breaking any of HMG's targets). In addition the RAP allows for a second secondary school in the North of Rugby education planning area and meets RBC's aspirations for employment land.

Conclusion

The RAP meets HMG's numerical targets.

The RAP provides an additional secondary school and more than meets RBC's employment land requirements.

The RAP refocuses our borough's development along the lines of the CS1/GP2 settlement hierarchies.

By reducing the need for trips and siting development closer to our main sustainable transport nodes the RAP responds to RBC's Declaration of a Climate Emergency.

Appendix 1 – Policy CS1 from Rugby Borough Council's Core Strategy (2011)

Policy CS1: Development Strategy

The location and scale of development must comply with the settlement hierarchy. It must be demonstrated that the most sustainable locations are considered ahead of those further down the hierarchy.

RUGBY TOWN CENTRE	<ul style="list-style-type: none">• Primary focus for services and facilities.
RUGBY URBAN AREA	<ul style="list-style-type: none">• Primary focus for meeting strategic growth targets.
MAIN RURAL SETTLEMENTS <i>Binley Woods, Brinklow, Clifton on Dunsmore, Dunchurch, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston and Wolvey</i>	<ul style="list-style-type: none">• Development permitted within existing village boundaries.• Local housing needs is prioritised over market housing
LOCAL NEEDS SETTLEMENTS	<ul style="list-style-type: none">• Small scale development to meet local housing needs permitted within existing village boundaries.• A threshold of 0.2 Ha applies.
COUNTRYSIDE	<ul style="list-style-type: none">• Development will not be permitted if the site could reasonably form part of a larger developable area.• New development will be resisted; only where national policy on countryside locations allows will development be permitted.
GREENBELT	<ul style="list-style-type: none">• New development will be resisted; only where national policy on Green Belt allows will development be permitted.

Continued...