



South Warwickshire Together



**Rugby Local Plan Preferred Option (Regulation 18)**  
**Consultation – March 2025**  
**Response from the South Warwickshire Councils (Stratford-**  
**on-Avon District Council and Warwick District Council)**  
**May 2025**

Subject to political sign off by respective Portfolio Holders

### **Introduction**

Rugby Borough Council (RBC) has invited representations from both South Warwickshire Councils regarding their Preferred Option consultation on the Rugby Local Plan Review. The consultation has been prepared under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Preferred Option consultation document sets out a proposed development strategy for the borough for the period 2024-2045. This identifies what development and land use should go where. It also includes draft development management policies to be used for determining planning applications, including policies to tackle issues identified in the 'Issues and Options' consultation in October 2023.

The consultation commenced on 24<sup>th</sup> March 2025 and ends on 19<sup>th</sup> May 2025. The consultation documentation can be viewed [online](#).

This response is written on behalf of both Warwick District Council (WDC) and Stratford-on-Avon District Council (SDC). The two authorities are working together on preparing a joint South Warwickshire Local Plan (SWLP) and following the end of the SWLP Preferred Options consultation stage in early March 2025, the Councils are now working towards the Regulation 19 (Submission stage), timetabled for winter 2025/26.

### **Context and background**

Both the South Warwickshire Councils share an administrative boundary with Rugby Borough. WDC, SDC and RBC, along with other Warwickshire authorities, are all part of the Coventry & Warwickshire Housing Market Area (HMA) and Functional Economic Market Area (FEMA). All three authorities, along with other Warwickshire authorities and Solihull Metropolitan Borough Council, meet monthly through the Coventry, Solihull & Warwickshire Association of Planning Officer (CSWAPO) to discuss strategic planning matters.

### **Response – covering relevant strategic planning matters**

#### **Housing**

As noted above, the Rugby Local Plan Preferred Option consultation proposes a plan period of 2024-2045. Policy S2 sets out that the standard method will be used to derive the Local Housing Need (LHN) for the Borough, and the figure of 618dpa is quoted which is the published LHN at December 2024. Whilst this is an increase in Local Housing Need since the previous standard method calculation under the 2023 NPPF, it is noted that the new LHN for Rugby is below the overall housing need figure of 735dpa in the 'trend-based scenario' in the [2022 Coventry and Warwickshire HEDNA](#) which

forms part of RBC's evidence base. It is noted that policy S2 indicates a supply of 14,314 homes which equates to approximately a 10% surplus over the required plan period target of 12,978 homes. Whilst the standard methodology has altered since the preparation of the 2022 C&W HEDNA, there was no apparent evidence base document discussing housing need and the role that the 2022 C&W HEDNA has had in informing the strategy for housing growth in Rugby's Local Plan.

Of the strategic allocations shown in policy S2, it is noted that no strategic housing allocations are proposed close to the Rugby's boundary with either Warwick or Stratford Districts.

### **Gypsies and Travellers**

Policy S4 identifies proposed allocations for 46 pitches for gypsies and travellers during the plan period. Rugby's 2025 Gypsy and Traveller Accommodation Assessment identifies a need for 94 pitches over the period 2024-2042. Separate to the Preferred Option consultation, RBC wrote to both the South Warwickshire Councils on 10<sup>th</sup> April 2025 setting out that a shortfall of circa 48 gypsy and traveller pitches exists. RBC requested assistance from both WDC and SDC in accommodating any of the unmet need. Whilst WDC and SDC intend to respond to this request under the Duty to Cooperate in addition to this Reg 18 response, by way of context, the SWLP sets out that South Warwickshire has a need to provide 89 pitches over the SWLP plan period to 2050. At present, sites have not been identified to meet this need in full.

It is felt that the text in policy S4 is currently unclear as no reference is made to the identified shortfall in pitches or that RBC are seeking to export this unmet need to other local authorities. It is also noted that the need period for gypsy and traveller pitches does not cover the full plan period for Rugby Local Plan, so there is potentially further unidentified need to 2045.

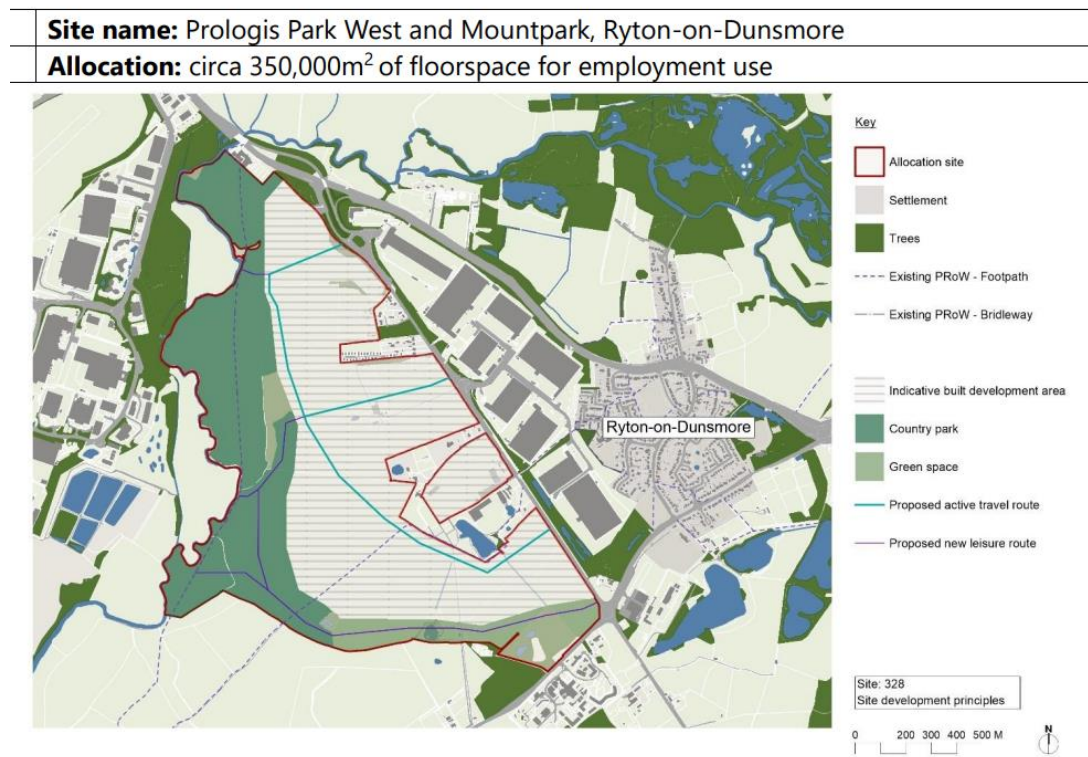
### **Employment**

Policy S3 sets out the requirement for 284ha of B2, E(g)(ii) and B8 industrial and storage and distribution floorspace and 4.4ha of office floorspace. Whilst no explanation is given in the draft Local Plan as to how these figures have been derived, the 2025 Topic Paper entitled [Development Needs](#) sets out how these requirements relate to the local (2022 C&W HEDNA) and sub-regional ([2024 West Midlands Strategic Employment Sites Study](#) and associated Alignment Paper) evidence base. However, it is not clear whether RBC consider the requirement in policy S3 will meet the Borough's full employment needs for the plan period. It is not made clear whether there is a shortfall in employment supply or indeed whether Rugby has identified additional capacity to meet wider strategic sub-regional needs. This matter is discussed further below with regard to Coventry's identified unmet need for industrial land.

### **Proposed Employment Allocation: Prologis Park West, Ryton-on-Dunsmore**

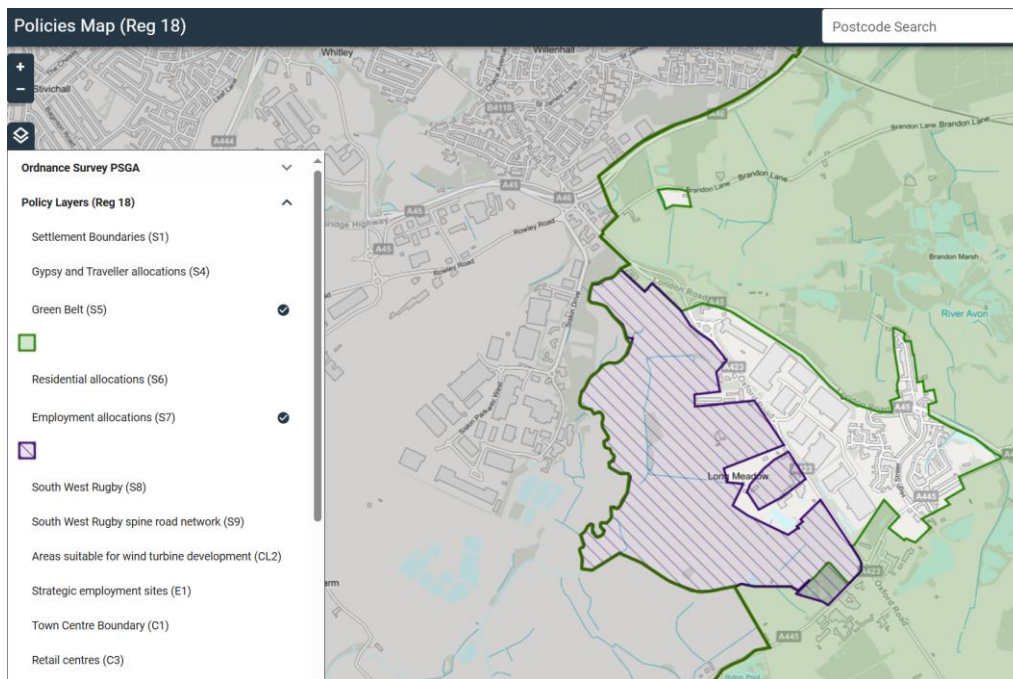
Policy S3 sets out strategic employment allocations and policy S7 reiterates these locations. Within both these policies, a circa 350,000m<sup>2</sup> employment allocation at Prologis Park west and Mountpark, Ryton-on-Dunsmore is referenced. The Local Plan Annex: 'Development site allocation' provides further details on the proposal, which relates to Site ID: 328. This site lies adjacent to the administrative boundary with Warwick District and within the West Midlands Green Belt. The Regulation 18 Policies

Map indicates that a small portion of the site will remain within the Green Belt, but it is noted that this does not align with the location for the proposed 55ha country park that is proposed along the western site boundary with the River Avon.



*Extract from Rugby Borough Preferred Option Consultation – Site ID:328 Masterplan*

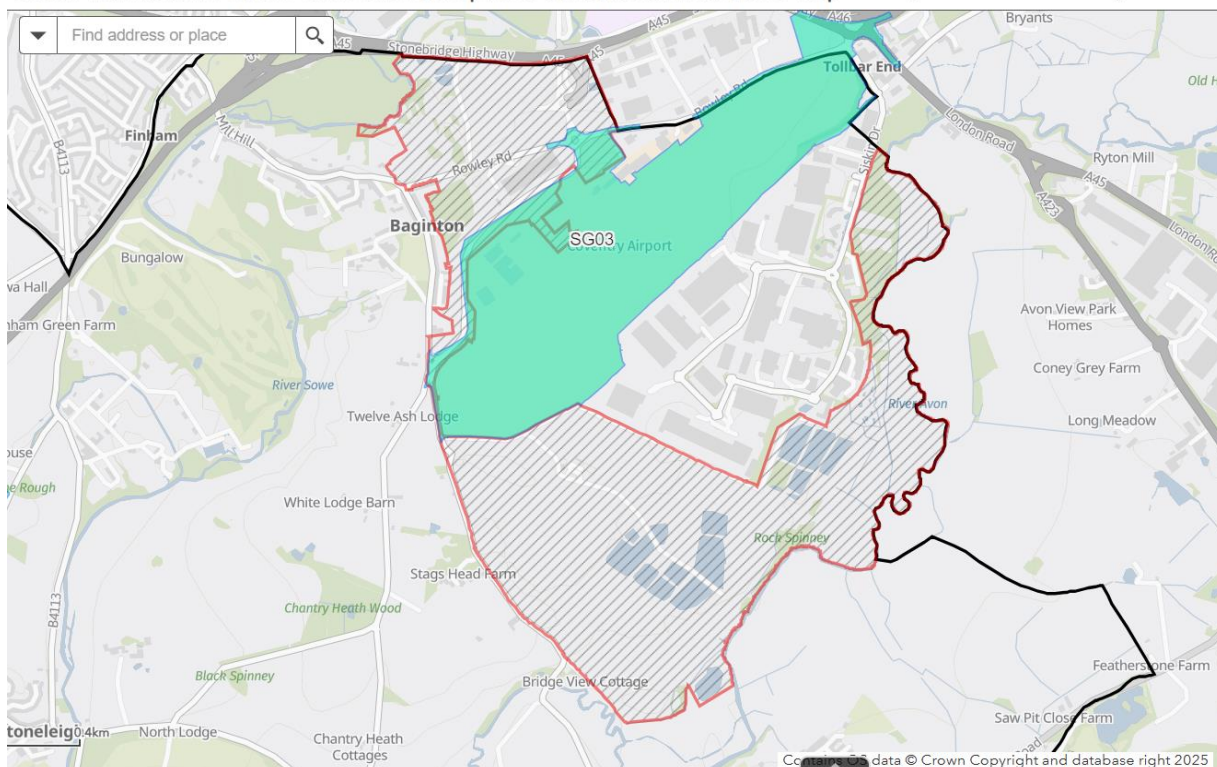
Policy S5 ‘Countryside protection’ states that the extent of the Green Belt is shown on the policies map (an extract from the Reg 18 Policies Map is included below). The draft Local Plan lacks clarity on which areas are proposed to be released from the Green Belt. However more fundamentally, there does not appear to be an up-to-date evidence base assessing the contribution the borough’s Green Belt makes to the NPPF’s Green Belt purposes. It is imperative that a Green Belt assessment is carried out to establish the impact the release of this site could have on the remaining Green Belt in this part of Warwickshire.



*Extract from Rugby Borough Preferred Option Consultation Policies Map*

It is not clear what mix of employment floorspace is proposed on the Prologis West strategic site, with the Local Plan Annex only making specific reference to 8,000m<sup>2</sup> of small to medium sized buildings for SMEs. This leaves over 340,000m<sup>2</sup> allocated within the broad categories of General Industry, Storage and distribution and Research and Development. Clarity should be added to the Local Plan as to the exact mix of employment uses to be delivered across the whole of the site.

RBC will be aware that land at Coventry Airport (to the west of the proposed Prologis West allocation) was included in the 2025 SWLP Preferred Options as a potential location for strategic employment growth and major investment site (SG03: Coventry Airport Group / MIS.4 South of Coventry Area). If taken forward in the SWLP, this Strategic Employment Site would build upon the existing 'Coventry Gateway' allocation DS16 in the adopted Warwick District Local Plan, which allocates 235ha of land in the vicinity of Coventry Airport as a major employment site of sub-regional significance.



*Extract from SWLP Preferred Options Interactive Map (green denotes SG03 Coventry Airport and the red outline and black hatching indicates existing Warwick District Local Plan allocation DS16)*

There is therefore a need for strategic cross-boundary discussions to develop a collaborative approach if both sites are to be brought forward as strategic employment allocations. Firstly, to ensure that the market is capable of delivering both sites as part of a significant sub-regional offer and as referred to above, to ensure that the specific employment mix on each site complements rather than competes with each other. Additionally, specific regard needs to be had to the cumulative impact the sites will likely have on infrastructure in the South Coventry area if they are both to move forwards in their respective Local Plans. Discussions will need to cover issues including utilities provision and capacity, impact on the local and strategic highway network (namely the A46 and A45) including modelling both direct and cumulative impacts, and an active travel and public transport strategy to improve access to the sites from the likely employee base in Coventry and its surrounds. The South Warwickshire Councils anticipate that Warwickshire County Council and National Highways (as manager of the Strategic Road Network) will need to play a pivotal role in such discussions.

If this site is taken forward as a preferred allocation, there should be a policy requirement specifying delivery of a suitable bridge (accommodating active travel modes) from the proposed country park into the adjacent country park to the west (being delivered by SEGRO – WDC planning application W/21/1655). This can help deliver more comprehensive and connected areas of country park for local communities and delivery off-road active travel routes between Baginton and Ryton-on-Dunsmore and on through to Ryton Pools Country Park.

A detailed assessment of the potential impacts to Bubbenhall village should also be undertaken and formalised through a policy requirement. We would question whether the area of green space as indicated to the south of the site is sufficient to protect village amenity and mitigate the impacts of the development, particularly given the current lack of clarity around likely end uses. We would recommend that a wider band of country park and tree planting should be shown instead.

Whilst the South Warwickshire Councils welcome the identification of a continuous country park along the western boundary of the employment allocation (along the River Avon which forms the border with Warwick District), further details are needed as to how the country park will compensate for the habitats lost through the delivery of substantial levels of employment floorspace, how the country park will be integrated with the Coventry Gateway community park to the west and how the open space will be made accessible to the surrounding populations in both Warwick District, Rugby Borough and Coventry.

It is also noted that a small area of land is to be provided within this strategic employment allocation as a Gypsy and Traveller site to accommodate 8 pitches. Whilst details on the precise location of the proposed Gypsy and Traveller site within the employment allocation are not currently known, it is important that an economically, socially and environmentally sustainable location is chosen in accordance with the [Planning Policy for Traveller Sites \(2024\)](#). The health and well-being of the future occupants should be given full consideration, particularly given the potential for safety, noise and air quality issues arising from the surrounding proposed employment uses.

It is noted that part of the proposed site is allocated for sand and gravel working in the adopted Warwickshire Minerals Local Plan (site 6 – Coney Grey Farm – for c.04.m tonnes) and there are policies within that plan to prevent unnecessary sterilisation of mineral resources. Any mineral working or potential prior extraction is likely to impact on site phasing and so those issues may need to be explored further, including with Warwickshire County Council.

### **Unmet needs and the Duty to Co-operate**

The draft Rugby Local Plan currently makes no reference to its potential to meet unmet housing or employment needs from outside of the Borough. Reference to the unmet industrial need of 45ha identified in the recently published Regulation 19 Coventry Local Plan Review is made within the aforementioned Development Needs Topic Paper. The Topic Paper states the amount of additional industrial floorspace (both gross and net) that would be required to be identified should all of Coventry's unmet need be accommodated in Rugby Borough. However, the topic paper is silent on whether the Local Plan proposes to meet all or some of Coventry's identified unmet need. As referenced above, policy S3 could be revised to include useful clarification on this point.

Equally the draft Local Plan does not mention the duty to co-operate, a requirement of Section 33A of the Planning and Compulsory Purchase Act which is built upon through relevant paragraphs on 'Maintaining effective cooperation' within the Plan-making chapter of the 2024 NPPF. The South Warwickshire Councils anticipate the need to collaborate closely with RBC as their respective Local Plans develop, on strategic cross-

boundary matters such as significant allocation proposed close to administrative boundaries and in respect of meeting any unmet needs arising within the Coventry and Warwickshire HMA or FEMA.

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