



Development Strategy Team
Town Hall
Evreux Way
Rugby
CV21 2RR

19 May 2025

Rugby Borough Council Local Plan Preferred Options (March 2025) Consultation

1. These representations have been prepared by Homes England on behalf of the consortium of developers and land promoters at South West Rugby in response to Rugby Borough Council's consultation on the Local Plan Preferred Options.
2. The consortium comprising Homes England, Catesby Estates and Taylor Wimpey are working collaboratively to deliver a comprehensive development of the South West Rugby allocation under Policies DS8 and DS9 of the adopted Local Plan (2019).
3. The consortium's response with reference to the relevant policies of the Local Plan Preferred Options is set out below.

S2 Strategy for homes

4. The consortium strongly supports the inclusion of South West Rugby within Part B of the policy and the 3,990 homes identified and its expected significant contribution to meeting the Borough's housing needs over the proposed plan period.
5. South West Rugby has been subject to a number of planning applications for new housing pursuant to the extant allocation for the site including:
 - An outline application by Catesby Estates for 210 homes and a 2FE primary school which was approved in December 2022 (Ref: R18/0936). The site is currently subject to a reserved matters application by Miller Homes which is currently being considered by the Council (Ref: R24/0971);



- An outline application by Tritax Symmetry for 275 homes approved at planning committee subject to S106 in February 2025 (Ref: R18/0995); and
 - An outline application by Tritax Symmetry for up to 350 homes submitted in August 2022 which is currently being considered by the Council (Ref: R22/0853).
6. In addition to the above, the following planning applications have either been submitted or are due to be submitted imminently:
- An outline application for up to 800 homes by Taylor Wimpey;
 - An outline application for up to 470 homes by Catesby Estates; and
 - A hybrid application for up to 1,600 homes, mixed-use centre, new schools and highway infrastructure.
7. A further application by Taylor Wimpey for up to 200 homes is expected later in 2025.
8. Once the four applications outlined above have been submitted, the Council will either have approved or be in receipt of applications totalling up to 3,905 homes with part of the site expected to come forward at a later date.
9. On this basis, the inclusion of South West Rugby within Policy S2 is considered to be entirely appropriate.

S3 Strategy for employment land

10. Whilst the consortium broadly supports the proposed strategy for employment land, it has specific comments on the proposed allocation of the safeguarded land at South West Rugby (listed as South West Rugby Employment Phase 2 under Part B of the policy) which is outlined under Policy S7 'Employment Allocations' below.

S6 Residential allocations

11. The consortium is broadly supportive of the allocation of new housing sites that are required to meet the housing needs of the Borough over the plan period. However, the consortium has not collectively reviewed in detail any of the proposed new allocations.
12. The following proposed allocations are, however, likely to benefit from infrastructure currently being delivered and paid for by the South West Rugby scheme due to their proximity to the allocation:
- Fenley Fields, Cawston, Rugby for 80 homes (Ref.122);
 - Homestead Farm, Dunchurch for 30 homes (Ref. 90); and
 - Land south of Coventry Rd, Dunchurch for 180 homes (Ref. 341).
13. The above schemes totalling 290 homes should be contributing towards the majority of infrastructure items listed in Appendix K of the SPD (with perhaps the exception of open space) given their relationship with the South West Rugby allocation and given that they will be benefiting from the same infrastructure to mitigate their own schemes.



14. There are a number of other allocations for new housing development dispersed across Rugby that are located close to or potentially would benefit from highways and active travel mitigation schemes that the developers at South West Rugby are contributing towards (or in some cases paying for in full).
15. The items listed in Appendix K of the South West Rugby Masterplan SPD which are considered likely by the consortium to benefit some of the proposed allocations are listed below.
 - Rugby Gyrotory Improvements;
 - B5414 (North Street/Church Street) traffic calming and downgrading of route;
 - A426/Evreux Way;
 - B4429 Ashlawn Road/ A428 to Great Central Way/ DIRFT active travel route;
 - B4429 Ashlawn Road/Percival Road (widening to provide a right turn lane);
 - A428 Hillmorton Road/Percival Road; and
 - Hillmorton Road/Whitehall Road Roundabout (widen two arms to provide roundabout and 2 puffin crossings).
16. The proposed allocations should be assessed by RBC and WCC to determine the likely mitigation that each would require to support the allocation of the sites. Following assessment, should any of the site's benefit from the mitigation schemes listed above (or any others that are currently identified in Appendix K), then those schemes should be expected to make a contribution towards the costs of the mitigation schemes on a proportionate and fair basis.
17. The consortium's view that new allocations schemes should be contributing towards the mitigation / new infrastructure where it is demonstrated that they benefit from the said infrastructure, is consistent with and supported by Policy I4 'Infrastructure and Planning Obligations' of the emerging Local Plan which under Part B notes that planning obligations may include retrospective contributions towards infrastructure improvements which have been fully or partly delivered at the date the relevant obligation is entered into, but which deliver necessary mitigation for the proposed development.

S7 Employment Allocations

18. Although the consortium is broadly supportive of the allocation of the safeguarded land for employment development at South West Rugby, there are a number of concerns that the consortium would like to see addressed as part of any allocation for the site.
19. The proposed allocation and the details included in the Development Site Allocations Annex (Site ID: 17) include land at its eastern extent that is allocated for new housing development in the adopted Local Plan and South West Rugby Masterplan SPD but is now shown as a country park. The allocation of this part of the site will reduce the number of homes at South West Rugby by circa 90 homes meaning that the overall allocation of 3,990 may not be achieved on the site. This places greater pressure on the viability of the allocation as it will result in fewer homes being available to contribute towards the Appendix K costs. If allocated for a country park, it will be even more important that the Council seeks contributions towards Appendix K costs from the new allocations proposed in the vicinity of the site to make up any shortfall in contributions.



20. Catesby Estates will be making representations on the allocation of this part of the site under separate cover.
21. The details provided in the Annex also identifies that an open space buffer is provided between the employment allocation and the county park to the east. The proposed allocation should also include sufficient setbacks from the edge of the parcel with Homes England land to the south east and include a landscape buffer between the new employment land and the edge of the development parcel for Homes England's land so that the new development does not impact on the delivery of new homes at South West Rugby.
22. The policy wording for the allocation once prepared should also be explicit in providing protection between the employment edge and Homes England's land. There should be a landscape buffer provided on the employment site allocation eastern / southeastern boundary with any future employment scheme expected to provide the design response.
23. The policy wording should also include requirements to set down building heights closer to the housing allocation in the east / south east of the allocation site to protect the future residential amenity of residents on the housing sites to the east/south east.
24. The development of the safeguarded land will benefit from infrastructure being paid for and delivered by the South West Rugby allocation. Contributions from the employment allocation should be sought towards highway, active travel and public transport infrastructure outlined in Appendix K of the SPD.
25. Finally, the allocation should be consistent with the requirements of the SPD in terms of restricting vehicular and HGV access between the employment land in the west and the residential parcels in the east along the sustainable transport corridor.

S8 South West Rugby

26. The consortium strongly supports the allocation of South West Rugby under policy S8 for the reasons set out in the response to Policy S2 above and is committed to delivering the requirements of the policy within the submitted and forthcoming planning applications on the site.

S9 South West Rugby Spine Road network

27. The consortium strongly supports Policy S9, and the alignment of the routes shown on the policies map which is consistent with the emerging proposals for the site.

CL1 Net Zero Buildings

28. Whilst the consortium appreciates that the Council wants to go further and faster in respect of achieving net zero carbon development at the earliest opportunity, Policy CL1 as currently worded requires development to be designed and built to be net Zero Carbon in operation. This is contrary to the December 13th 2023 Written Ministerial Statement from Baroness Penn which sets out that Local Plans should not go beyond minimum energy efficiency standards for new buildings.
29. The most recent case law on this is set out in the ruling issued by Justice Lieven DBE issued on the 2nd of July 2024 (Rights Community Action Limited vs the Secretary of State for Levelling Up, Housing and



Communities. Case No: AC-2024-LON-000621). While it is acknowledged that this is being challenged in the Court of Appeal and will be heard on 24-25 June 2025, as things stand the current authoritative case law is clear that Local Authorities should not go beyond existing minimum energy efficiency standards for new buildings in their Local Plan policies.

C1 Rugby Town Centre

30. The consortium notes the reference under Part A(iii) to the downgrading for traffic of North Street and part of Church Street and a refreshed Market Place public square.
31. Appendix K of the South West Rugby Masterplan SPD currently anticipates that development at South West Rugby makes a significant contribution to these works.
32. Any development in the town centre (such the town centre allocations, redevelopment of the Rugby Central Shopping Centre and development around the station (living quarter) should be contributing towards this infrastructure and not South West Rugby.

C2 Main town centre uses

33. The consortium supports the policy and reference to South West Rugby in the retail hierarchy and support the intention that proposals for main town centre uses within the mixed-use centre on the allocation will not be subject to the sequential test or retail impact assessments.

C3 Local and district centres

34. The consortium is supportive of the policy in respect to South West Rugby.
35. However, the policies map would benefit from amendments to align with the emerging proposals for the mixed-use centre at South West Rugby. The policies map boundary does not currently cover the entirety of the proposed mixed-use centre for the allocation.

EN7 Environmental protection and amenity

36. The consortium is supportive of the proposed policy – particularly Part B of the policy in light of the comments provided under Policy S7 above and potential proximity of employment on safeguarded land to the proposed housing on the Homes England land to the east.
37. The consortium strongly supports Part B of the policy which states:

‘New development shall not have unacceptable impact on the amenity of existing or proposed users or occupants of neighbouring buildings or land and shall provide adequate amenity for the occupants and users of the proposed development in relation to ventilation, daylight, sunlight, privacy, security and avoiding an overbearing impact.’
38. This wording further supports the consortium’s view that sufficient buffers and setbacks (including height restrictions) should be placed on the eastern boundary of the allocation for the safeguarded land at South West Rugby.



I4 Infrastructure and planning obligations

39. The consortium strongly supports the policy wording, particularly Parts A and B.
40. Any new development that benefits from infrastructure mitigation already being provided by schemes such as South West Rugby should include planning obligations that may include retrospective contributions towards infrastructure improvements which have been fully or partly delivered at the date the relevant obligation is entered into, but which deliver necessary mitigation for the proposed development.
41. This is to ensure that a fair and proportionate approach to mitigation is provided in line with the consortium's response on the proposed residential and employment allocations outlined under Policy S6 and S7 above.
42. It is important that there is an appropriate mechanism that allows contributions to be recalculated or redirected to those that have already paid / making contributions towards the requisite infrastructure where appropriate.
43. The consortium would welcome direct engagement with RBC outside of the formal local plan consultation process to agree an appropriate mechanism for redistribution of any retrospective contributions from developers outside of the South West Rugby allocation who are reliant on the infrastructure delivered by the South West Rugby allocation developers.

I6 Secondary education

44. The consortium supports the principle of the policy to secure appropriate contributions towards new school provision to meet the needs of the Borough.
45. However, the supporting text notes that to deliver the new secondary school in north Rugby at St Thomas Cross, S106 contributions will need to be combined from all new residential development, wherever located. The Council notes that this is justified even where the development would not be within the catchment of the new school, because the new school will help alleviate pressure on other schools in the borough.
46. The consortium considers that education contributions from the schemes located in proximity South West Rugby, namely:
 - Fenley Fields, Cawston, Rugby for 80 homes (Ref.122);
 - Homestead Farm, Dunchurch for 30 homes (Ref. 90); and
 - Land south of Coventry Rd, Dunchurch for 180 homes (Ref. 341).
47. Should be directed towards education provision for primary and secondary schools at South West Rugby instead given that new pupils from these sites will be using facilities being provided as part of the allocation.
48. The supporting text for the policy should be amended to accommodate the above.



49. The consortium trusts that the above comments will be considered by the Council as the Local Plan progresses but would be happy to discuss any of the comments further if required.
50. The consortium looks forward to continuing to support the Council as the Local Plan and the allocation of SW Rugby progresses.

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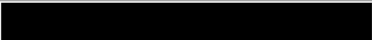

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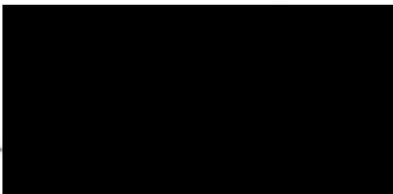
These representations have been prepared by Homes England on behalf the consortium at South West Rugby and have been signed off by the following:

Signed: 






Signed: 
Name: 





Signed: 
Name: 