

# #1

COMPLETE

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## Page 1: Introduction

**Q1** **Agree**

To what extent do you agree with the selection of these objectives?

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**Q2**

What are the reasons for your answer to question 1?

Richborough supports these objectives, and in particular the aim of growing Rugby Borough's economy in sustainable locations.

However, greater recognition should be given to the role of the Logistics Sector in Rugby and its continuing importance to the local economy. The emerging Economic Strategy for Rugby references the ability of businesses in the logistics sector to deliver skilled jobs to support automation and other technologies. It also highlights Rugby's role at the heart of the Golden Triangle providing a highly sought after location for the logistics sector, within a four-hour drive of 90% of the British population. Whilst the need to diversify Rugby's economy is acknowledged, the continuing importance of the logistics sector to the employment market should not be lost.

The largest business sectors in Rugby are logistics (14.7%) and manufacturing (12.9%) with particular strengths in aerospace and automotive. (NOMIS 2024)

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## Page 2: Strategy for homes and residential allocations (policies S2 and S6)

**Q3** **No Answer**

To what extent do you agree with the more dispersed overall spatial strategy for new homes?

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**Q4** **Respondent skipped this question**

What are the reasons for your answer to question 3 and if you disagree with the proposed spatial strategy what alternative should we pursue?

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**Q5** **Respondent skipped this question**

Is there a site that is proposed to be allocated for housing in policy S6 that you do not support? If so, which site and why?

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**Q6** **Respondent skipped this question**

The development sites annex lists development requirements for the allocated sites. Are there additional or different requirements we should be seeking? Please specify which site you are referring to.

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Page 3: Strategy for employment land and employment allocations (policies S3 and S7)

**Q7** **Disagree**

To what extent do you agree with the strategy for employment land?

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## Q8

What are the reasons for your answer to question 7? If you disagree, what alternative location(s) would be better and why?

Richborough support the allocations chosen to deliver the employment land strategy.

However, Richborough believe that the Employment Need has been underestimated and further allocations are required to meet regional requirements. The reasons for this are outlined in the accompanying Employment Land Statement / written reps. We believe that further work is required to establish a more accurate level of need, particularly in relation to the assessment of floorspace needed to handle projected future freight volumes.

One site capable of meeting any shortfall is the land at Wolvey Heath, which comprises approximately 99ha and is capable of providing 200,000 sqm of employment floorspace.

Whilst allocation of the site will require the release of Green Belt land, we note the Council's reasoning for the justification for releasing three of the proposed allocations from the Green Belt.

As set out in the Cabinet Report, as well as the Sustainability Appraisal (SA), the Council considers that 'exceptional circumstances' exist justifying Green Belt release. One of the reasons given is as follows:

- The need for strategic employment land is regional in nature. The functional economic market area (FEMA) in which Rugby Borough lies is centred on Coventry. Coventry is the main population and economic centre in the FEMA, but given its tightly drawn administrative boundary and limited employment land supply, it cannot meet its needs within its administrative boundaries. Allocating employment land within Rugby Borough near to Coventry provides the most sustainable approach to meeting the identified needs.

This equally applies to land at Wolvey Heath. The site is strategically located adjacent to the M69 / A5 providing easy access to Coventry to the south and Hinckley to the North.

We note that the Council is in the process of preparing a Green Belt Contribution Study in line with the latest Government guidance on the preparation of such studies published in February 2025. This will assess the contribution green belt land within the borough makes to the five green belt purposes defined in the NPPF and identify grey belt land. We support the Council in its efforts to ensure that its evidence base fully aligns with national policy requirements.

However, the most up to date evidence on Green Belt in Rugby is contained within the 2015 West Midlands Joint Green Belt Review Study. This Study covered a large geography and was strategic in nature. Given its age, it fails to consider the emphasis the NPPF now places on meeting the needs of a 'modern economy', including logistics. Paragraph 87 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. For storage and distribution operations this includes making provision at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation.

Given the age of the Green Belt study, the changes to the NPPF (which include the emphasis on providing for the needs of a modern economy and the addition of 'Grey Belt' land) along with the established need for more employment land, it is clear that Rugby Borough Council need to undertake a new Green Belt Study which addresses these points.

Although we await the outcome of the Council's Green Belt Study Update, we would like to note that in our view land at Wolvey Heath does not contribute strongly to Green Belt purpose a), b) and d) as outlined below and as such, believe that it meets the NPPF definition of 'Grey Belt':

- The site is not immediately adjacent to any large built-up areas. It is close, but not connected, to Hinkley however plays no role in preventing sprawl due to the presence of the A5 and M69 in-between. These roads act as a strong permanent boundary feature which act to prevent sprawl. It therefore makes no contribution to Green Belt Purpose a).
- The site is not located within a gap between two neighbouring towns. As noted above it is located close to Hinkley however

## Questionnaire on Rugby's Preferred Options Consultation Document

The site is not located within a gap between two neighbouring towns. As noted above it is located close to Hinkley, however, the gap between Hinkley and Coventry is large enough and contains several other smaller settlements within it. It should be noted that this purpose relates only to town and not small villages. This has been confirmed in a number of recent appeals. In any case, the site does not prevent the merging of settlements of any size. It is therefore considered that the site makes no contribution to Green Belt Purpose b).

- The site is not close to a historical town and therefore plays no role in preserving the setting and special character of historic towns (Green Belt Purpose d).

As a Grey Belt land, the site would fall to be considered ahead of several others in the hierarchy introduced in the NPPF and behind only previously developed land.

The Council's HELAA Stage 2 Site Assessment Report considered that the site at Wolvey Heath had poor accessibility. However, the site is well located adjacent to the local and strategic road network with proposed improvement to the transport network likely to address any existing congestion. Development on the site would be of sufficient scale to incorporate sustainable transport infrastructure and travel initiatives to link to Hinkley, Coventry and the wider region.

We strongly believe that the land at Wolvey Heath can contribute to the objectives of the Local Plan and help to meet the additional employment land needs that we feel a review of the employment land evidence base will reveal. The site:

- Is of a sufficient size to accommodate up to 200,000 sqm. of employment floorspace including a range of buildings plots to accommodate market demand from those sectors seen as key to contribute towards Rugby's Economic Strategy of creating a high skill high pay economy.
- benefits from excellent proximity to the strategic road network and is of a scale that development could support highway improvements, the provision of pedestrian and cycle links within the scheme and potentially the introduction of a new bus service to connect with existing routes to Hinckley and the wider area.
- offers an opportunity to provide low-density, high-quality buildings set within a managed high-quality landscape environment. This is to include the provision of significant landscape buffers and new green and blue infrastructure
- There are no technical constraints to the site's development that cannot be overcome through innovative design solutions. The site is not affected by any ecology or heritage constraints and is considered to be of low landscape and visual value. Any foul water drainage issues could be fully addressed through the site's layout and detailed design.

Land at Wolvey Heath can help to address employment land needs arising in Coventry providing economic benefits and employment opportunities to both Rugby and Coventry's population and the wider sub-region.

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### Page 4: Gypsy and Traveller sites (policy S4)

<b>Q9</b>	<b>No Answer</b>
To what extent do you agree with policy S4?	
<b>Q10</b>	<b>Respondent skipped this question</b>
What are the reasons for your answer to question 9?	

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### Page 5: Climate

<b>Q11</b>	<b>No Answer</b>
To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?	

**Q12**

Respondent skipped this question

What are the reasons for your answer to question 11?

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Page 6: Economy

**Q13**

Disagree

To what extent do you agree with the document's economic policies?

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**Q14**

What are the reasons for your answer to question 13?

Richborough consider that Policy E2, as currently drafted, is very restrictive and will limit available sites in sustainable and strategic locations coming forward for potential economic development.

The draft policy does not reflect the revised NPPF which places significant focus on supporting commercial development within various sectors, including logistics, giving more prominence for their crucial role in driving the economy. In doing this, the NPPF seeks that appropriate sites for commercial development need to be identified, including suitable locations for freight and logistics.

In line with the revised NPPF, the emerging Local Plan should apply a flexible approach where there is an opportunity to consider sites beyond the settlement boundary where it can be demonstrated that such sites are in a sustainable location and benefit from site specific locational requirements.

In accordance with the above, Richborough consider Policy E2 should be revised to include a further criterion as follows:

v. It would meet an identified need that cannot be met through extant allocations

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Page 7: Centres

**Q15**

No Answer

To what extent do you agree with the policies for retail centres?

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**Q16**

Respondent skipped this question

What are the reasons for your answer to question 15?

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Page 8: Environment

**Q17**

No Answer

To what extent do you agree with the document's environmental policies?

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**Q18**

Respondent skipped this question

What are the reasons for your answer to question 17?

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Page 9: Housing

**Q19**

**No Answer**

To what extent do you agree with the document's housing policies?

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**Q20**

**Respondent skipped this question**

What are the reasons for your answer to question 19?

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Page 10: Wellbeing

**Q21**

**No Answer**

To what extent do you agree with the document's wellbeing policies?

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**Q22**

**Respondent skipped this question**

What are the reasons for your answer to question 21?

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Page 11: Design

**Q23**

**Strongly Agree**

To what extent do you agree with the document's design policies?

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**Q24**

What are the reasons for your answer to question 23?

Richborough supports draft Policies D1-D5 which seek to create well designed new developments.

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Page 12: Infrastructure

**Q25**

**Strongly Agree**

To what extent do you agree with the document's infrastructure policies?

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**Q26**

What are the reasons for your answer to question 25?

Richborough fully supports Rugby Borough's approach to ensuring that the right infrastructure is in place to support development.

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Page 13: Any Other Feedback

**Q27**

If there are any other comments you wish to make regarding the consultation document which you have not already given in your preceding answers, please enter them here:

Alongside the answers provided to the consultation questions, please refer to the written representations in respect of the land at Wolvey Heath.

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Page 14: About you

**Q28**

What is your name?

[REDACTED]

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**Q29**

What organisation are you representing, if applicable?

[REDACTED]

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**Q30**

No

Are you a resident of Rugby Borough?

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**Q31**

Your contact email

[REDACTED]

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**Q32**

Your contact address

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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**Q33**

Your Postcode

[REDACTED]

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**Q34**

Male (including trans man)

What is your Gender Identity?

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**Q35**

████

Age

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**Q36**

██████████

Ethnicity

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**Q37**

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Do you consider yourself to be disabled?

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**Q38**

██████████████

What is your sexual orientation?

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**Q39**

██████

What is your religion or belief?

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