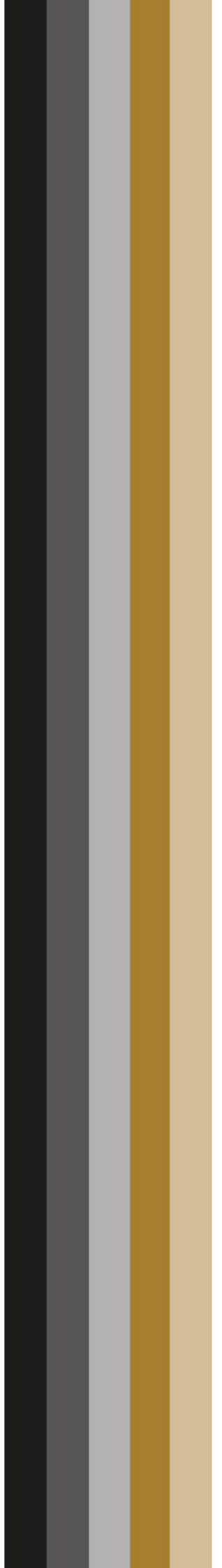
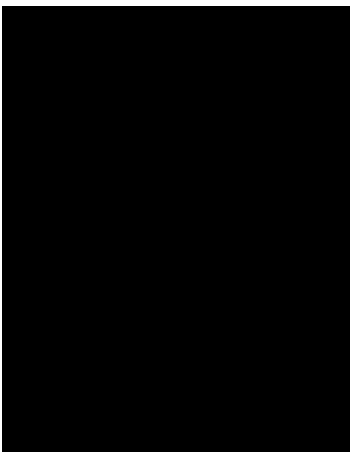


STOFORD

Rugby Borough Council Local Plan Preferred Options Consultation

Representations in Respect of Land Promotion
at Rugby East

May 2025



Executive Summary

These representations are submitted to the Rugby Local Plan Preferred Options in respect of land to the north of Houlton, referred to as Rugby East. The site has been promoted via the Local Plan review process and has been considered and assessed by the Council within their 'Call for Sites' as site number 130.

A red line boundary of the land being promoted is included at **Appendix 1**. The site is a greenfield, non Green Belt site located on the edge of Rugby's urban area and adjacent to the sustainable urban extension Houlton, where over 6,000 new homes are under construction, and a new community is already flourishing.

Located off the A5 with direct access, via a new proposed roundabout junction, the site will serve as a strategic employment site towards the Local Plan's employment land requirements. The site is within walking and cycle distance of the approved Rugby Parkway Railway station, which Warwickshire County Council's website confirms is programmed for opening in 2029.

In addition, the site is connected to DIRFT, the UK's national Rail Freight Terminal via the A5. This represents a significant opportunity for the Borough to deliver a strategic employment site that reflects the 'hub and spoke model'¹ principles. Notably, DIRFT provides an opportunity for goods to be transferred in and out of DIRFT by rail, and transferred to nearby floorspace such as Rugby East, for efficiencies, and to 'free up' the space at the terminal warehouses for the further in/out flow of goods that are rail freight dependent. DIRFT is also home to 'The Hub' where both businesses on the park, and externally, can utilise space set aside for businesses to meet, network and train.

Rugby East can also deliver a number of additional benefits beyond the direct economic impacts. The proposals that are detailed within our appended **Delivery Document (Appendix 2)** include details of a country park of some 60ha that together with adjacent public open space at Houlton would provide a walkable, accessible resource for Rugby's residents. We also propose additional features to ensure the scheme is policy compliant, noting the opportunities to provide for the needs of gypsies and travellers (on or off site); and buildings supported by non-carbon energy sources.

As part of our access proposals from the A5, we also propose to secure a series of junction improvements, to enhance safety at the Lilbourne Road junction with Clifton upon Dunsmore for example and contribute towards the planned improvements to Gibbet Hill.

The failure of the Preferred Options Local Plan to allocate the 135 hectares of land at Rugby East is strongly objected to within the following policy representation.

¹ Hub and Spoke Models are acknowledged within industrial and logistics markets – example definition: [Hub And Spoke Logistics: Improved Distribution | Brimich](#)

Our representations comprise:

1. The following written objections to Policies:
 - a) S1 - Settlement Hierarchy
 - b) S3 - Strategy for Employment Land
 - c) S7 - Employment Allocations
 - d) S8 - Sites for Gypsies and Travellers
 - e) CL2 - Renewable Energy and Low Carbon Technology
 - f) S5 - Countryside Protection
 - g) E2 - Employment Development
 - h) I5 - New Railway Stations
2. An appended critique of the Interim Sustainability Appraisal (SA), and representations to that SA are within our response to Policy S3 'Strategy for Employment land.' (**Appendix 3**)
3. A Technical Review provided by Marrons Economics team, which outlines the shortfalls within the employment land need of 284ha that is advanced within the Local Plan and is the subject of our response to Policy S3. (**Appendix 4**)

The key points made within our representations that form the basis of our objections are summarised as follows:

a) S1 - Settlement Hierarchy

We support the settlement hierarchy and the position of Rugby as the main focus for growth. We object to the failing of the Local Plan to then allocate land in accordance with that hierarchy and the depiction of the urban area/settlement boundaries on the policies map.

b) S3 - Strategy for Employment Land

This policy is strongly objected to. We list five key points that form the basis for our objections:

1. The level of employment land need at 284ha is insufficient and not reflective of the evidence base. Stoford's analysis confirms this need is within a range of 436-866 ha.
2. The decision to allocate 321ha of Green Belt land for employment is not consistent with the presumption in favour of sustainable development, as required in the NPPF.
3. The approach to release Green Belt, which underpins the strategy for employment land is not a result of effective strategic planning across Local Planning Authority (LPA) boundaries; is not based upon evidence; and is made without Exceptional Circumstances being demonstrated.

4. The employment land strategy is not informed by a Sustainability Appraisal (SA) that meets the **relevant legal requirements** as required by the NPPF (para 33).
5. The employment land growth scenarios in the Interim SA are **not justified or effective**.

c) Policy S7 - Employment Allocations

We object to the majority of new employment land allocations, analysing each using evidence including the SA and the Council's Stage 2 Site Assessment. We consider there to be issues of suitability, achievability and deliverability with the new allocations that renders the Local Plan as drafted, to be unsound, and when combined with the levels of employment land needs that we outline above.

d) S4 - Sites for Gypsies and Travellers

We provide commentary on this policy and refer to the opportunities for Rugby East to assist in addressing this need.

e) CL2 - Renewable Energy and Low Carbon Technology

We note that parts of our Rugby East site (land north of Houlton, site 130) have been identified as suitable for wind turbine development. As a recognised strategic employment site that has been deemed as potentially suitable for future employment uses within the Issues and Options Local Plan and the SA, an allocation for wind turbines on Rugby East would prejudice delivery of this site in the future.

f) S5 - Countryside Protection

We object to criterion B of policy S5 which delineates the extent of the Green Belt in the Borough on the policies map and effectively removes land from the Green Belt.

g) E2 - Employment Development

We object to this policy, which limits the development of employment floorspace in locations that are outside of settlement boundaries. Where land is not protected by designations such as those listed within para 11g, footnote 7 of the NPPF, then the Plan and planning policies should be;

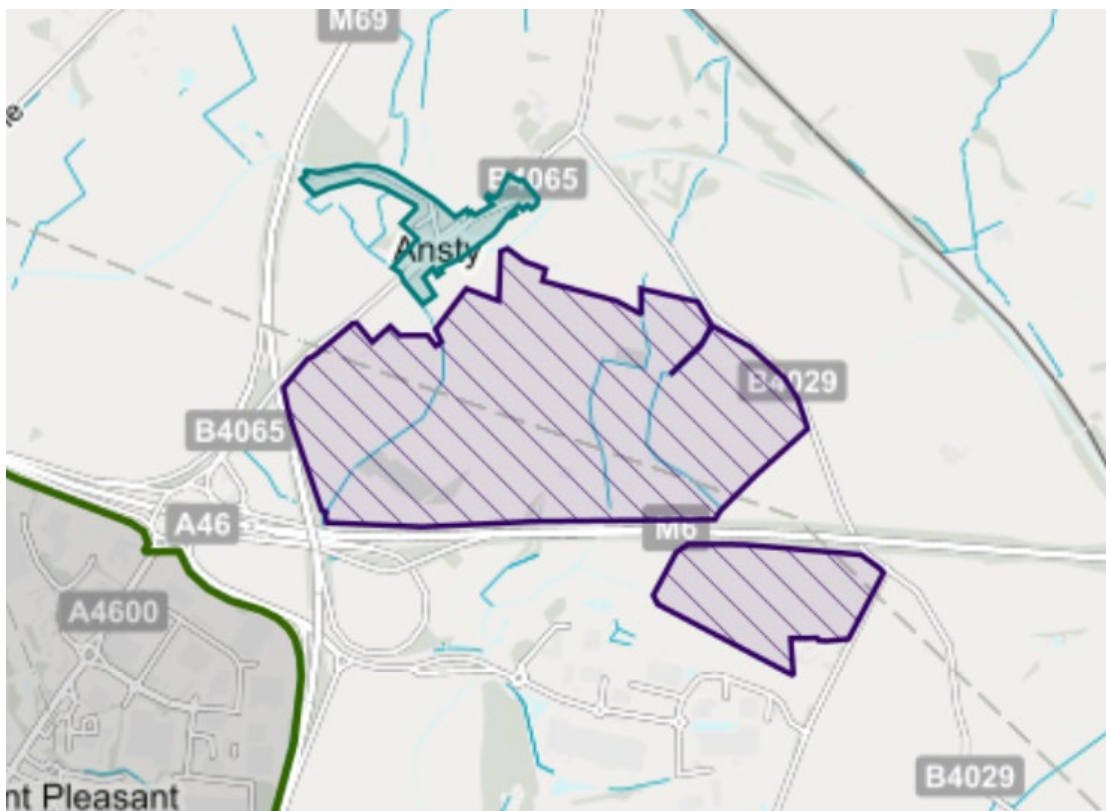
'flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances' paragraph 86 e of the NPPF advises.

h) I5 - New Railway Stations

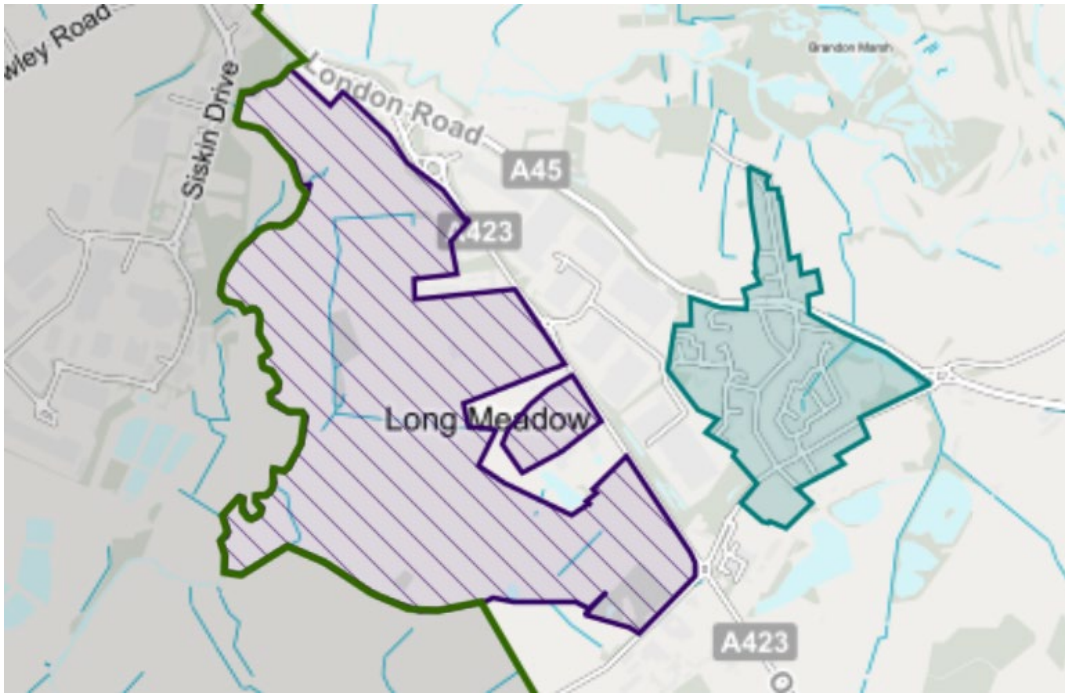
Stoford strongly support Policy I5 and criterion C, which states the *'development of the new Rugby Parkway Station as shown on the Policies Map will be supported.'*

Policy S1 Settlement Hierarchy

1. Stoford support Policy S1 that sets out a settlement hierarchy for new development. The hierarchy states that new development will be located in accordance with a hierarchy that places the Rugby urban area at the top, and as the main focus for growth. The second tier of settlement is Ryton on Dunsmore and Ansty is within the third tier.
2. It is therefore at odds with this policy, that the Local Plan allocates 321ha of Green Belt land which is not in accordance with the first tier of the hierarchy.
3. The settlement areas are identified in the extracts below, taken from the draft Policies Map and illustrate the settlement boundaries of Ansty and Ryton on Dunsmore. It is clear that none of the three employment allocations at Ansty North, Crowners Fields Farm or Prologis Park West and Mountpark, are located within those urban areas that are nearest to them, which does not align with the settlement strategy underpinning this Plan.

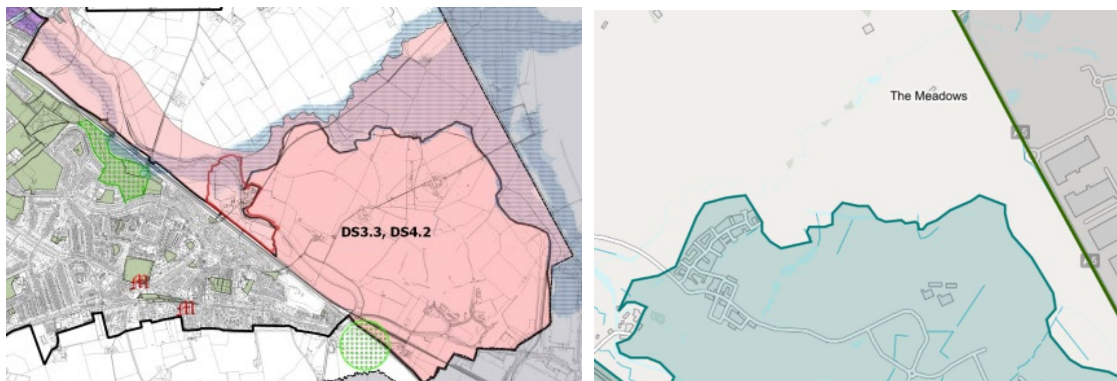


Extract (above) from the draft Policies Map – illustrating Ansty North and Crowners Fields Farm draft employment allocations, alongside Ansty.



Extract (above) from the draft Policies Map – illustrating the Prologis Park West and Mountpark draft employment allocation, alongside Ryton on Dunsmore

4. In addition, the settlement hierarchy as shown on the draft Policies Map does not show the full extent of the Houlton allocation, which was set out within the adopted Plan Policies Map of 2019. Extracts of both are below.



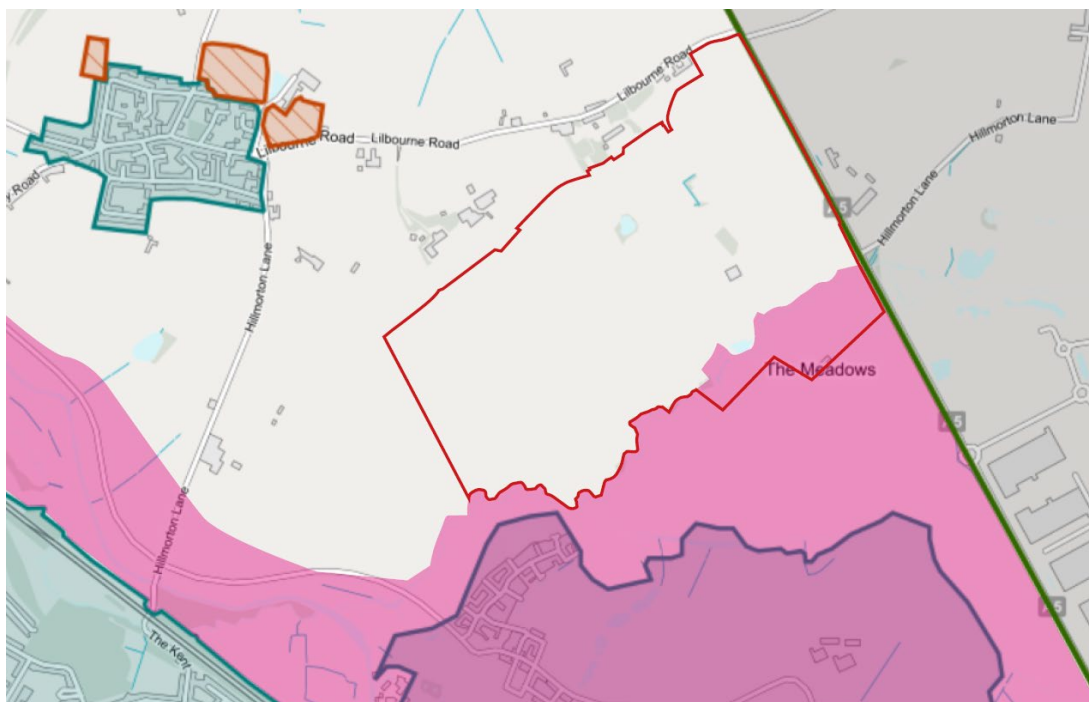
Extract (above left) Adopted Rugby Local Plan Proposals Map illustrating the allocation at Houlton shaded in pink, and (above right) the draft Local Plan Policies Map illustrating the settlement boundary now proposed.

5. Whilst the boundary of the urban area carries across, the allocation (the pink shaded area) does not. We object to this. The area shaded pink, includes key elements of Houlton, including the open space, sports pitch provision and footpath network that serves those new residents. This can be seen in the following extract, taken from the Houlton website and this reflects the outline planning application area for Houlton too.



Extract (above) taken from the <https://my.houltonrugby.co.uk/> website) illustrating the extent of Houlton planning application boundary.

6. When overlaid onto the draft Policies Map below, the natural extension to Houlton, that Stoford's promotion site Rugby East presents, is evident. This Plan below is annotated to show the adopted Local Plan allocation land (shaded pink) and the red line boundary of Rugby East. The emerging Policies Map should be corrected to reflect the area shaded in pink, carried across from the adopted Local Plan.



Extract (above left) draft Rugby Local Plan Proposals Map illustrating the settlement boundary (blue line), and annotated to show the Houlton Allocation from the adopted Local Plan (pink shading), and the extent of our promotion site - Rugby East, edged red.

7. The area of Houlton once completed, will provide a home to some 16,000 residents compared to the area of Ryton on Dunsmore for example, which has a community of circa 2,000, and to the 300 residents at Ansty. The allocation of Rugby East would be accessible to a far greater number of local Rugby residents, by a range of modes (cycle, walking, bus, rail, in addition to motorised vehicles) than the current Green Belt allocations are/will be. The settlement hierarchy within Policy S1 seeks to focus future growth on those locations i.e. Rugby, with the services and facilities necessary to support them, and for them to be sustainable. It is notable that both the Prologis Park West and Mountpark allocation, and that at Ansty North, are located closer to the main population of Coventry, however, neither site is being purported within the draft Rugby Local Plan as being allocated to meet the 45ha shortfall of employment land that is identified within the Coventry Local Plan (Page 5, Coventry Local Plan, Regulation 19, 2025). However, both sites are being allocated to meet the needs set out within the draft Rugby Local Plan, yet without exceptional circumstances being made to justify this departure from the settlement strategy.

8. Changes we seek to be made to the Local Plan

When overlaid onto the draft Policies Map, the natural extension to Houlton, that Stoford's promotion site Rugby East presents, is evident. This Plan annotated above shows the adopted Local Plan allocation land (shaded pink) and the red line boundary of Rugby East. The emerging Policies Map should be corrected to reflect the area shaded in pink, carried across from the adopted Local Plan. If subsequently allocated, the settlement boundary would then also extend around Rugby East.

Strategy for Employment Land and Employment Allocations (Policies S3 and S7)

Policy S3 Strategy for Employment Land

1. Stoford objects to the Strategy for employment land that is set out within Policy S3. Our objections address two critical components of plan making – that of development need (employment) and that of Green Belt and the decision of the Council to allocate land within this designation to which the Government places importance in terms of its protection, openness and permanence.

2. The following **five key points** are made in response to Policy S3.

1. The Strategy is based upon a level of need which we do not consider to be sufficient. The level of need that the Local Plan seeks to be met is 284ha. (See **Appendix 4** – para. 3d, Marrons, 2025 and also Policy S3) (**Key Point 1** paragraphs 1.1 to 1.11 below, cover this point – see Page 11)

We object to the strategy for meeting this need, which is primarily through the allocation of 321ha of Green Belt land for employment uses (Ansty North, Crowners Fields Farm and Prologis Park West Mountpark). This represents some 80% of the new employment land allocated area (gross). The following four key points are made in respect of the strategy meeting the employment land need, being primarily focused on Green Belt release.

2. The decision to allocate Green Belt land is not consistent with the presumption in favour of sustainable development, as required in the NPPF. (paragraphs 2.1 to 2.11 below, cover this point – see Page 13)

3. The approach to release Green Belt, which underpins the strategy for employment land is not a result of:

- i) effective strategic planning across LPA boundaries and is;
- ii) not based upon evidence and is;
- iii) made without exceptional circumstances being demonstrated
(paragraphs 3.1 to 3.30 below, cover this point – see Page 15)

4. The employment land strategy is not informed by a Sustainability Appraisal (SA) that meets the **relevant legal requirements** as required by the NPPF para 33. Whilst there is an SA available, this fails the tests of para. 33. The SA concludes (in commentary prepared by RBC rather than the authors of the SA) that a scenario that results in extensive Green Belt release, is an appropriate strategy in their outlined case for the preferred Plan approach at para 7.1.6 – 7.1.9 of the SA. It is our view that the SA should conclude with the preferred approach being Scenario 2. Scenario 2 is an alternative option. Para 33 of the NPPF states that ‘*Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.*’

The SA and Local Plan preferred approach fails to do this. (paragraphs 4.1 to 4.23 below, cover this point – see Page 22)

5. The employment land growth scenarios in the Interim SA are **not justified or effective** (paragraphs 5.1 to 5.13 below, cover this point)
3. Each of the above **five key points** are explored below in greater detail over the following pages.

Key Point 1

The Strategy is based upon a level of need which we do not consider to be sufficient. The level of need that the Local Plan seeks to meet is 284ha. (See Appendix 4 – para. 3d, Marrons, 2025, and also Policy S3 comments below)

- 1.1. Marrons, on behalf of Stoford have prepared a number of reports that we have submitted to the Council as part of our promotion of land at Rugby East. These reports have been submitted as part of the formal consultation process (i.e., the Regulation 18 Issues and Options in 2024) and as additional evidence has become available – e.g. in response to the WMSESS 2024 and the Alignment Paper.² These reports are appended again for ease at **Appendix 5**, and **6** and are accompanied by a more recent report that has taken account of the Development Needs Topic Paper, the Regulation 18 Preferred Options Local Plan, in addition to the HEDNA, WMSESS, and Alignment Paper.
- 1.2. Therefore, the report of May 2025, appended at **Appendix 4**, represents our most current position in respect of the level of need that the Local Plan should be planning for.
- 1.3. The Marrons Report (May 2025, **Appendix 4**) concludes that there is a range of potential needs that should be reflected in the Local Plan, and all are higher than the Council’s reported need of 284ha.
- 1.4. All sources of evidence used by the Council and the aforementioned supporting reports, use evidence of past completion trends to project forward, the recommended needs. In the case of Strategic Needs, these stem from the WMSESS and are based on an Opportunity Area (OA7) which extends primarily over Rugby and Coventry. Strategic Needs are also only represented in the WMSESS as residual (i.e. 75-150ha), and not as a gross strategic figure.
- 1.5. Marrons then use the data within the WMSESS and Development Needs Topic Paper to calculate that the WMSESS strategic needs as a gross figure for OA7 would be 285ha (2022-2045) (para 10, Marrons, **Appendix 4**).
- 1.6. However, Marrons highlight importantly, that the WMSESS and Development Needs Topic Paper do not take account of past completions trends for the 2011-2021/22 period – i.e. the most recent 11 year period. If this were to be the case, the strategic industrial needs for Coventry and Warwickshire would be 436ha (some 150ha above the current Local Plan/Development Needs proposed strategic needs, cited as 284ha).
- 1.7. The Local Plan and its evidence base also does not take account of the most recent completions trends period – i.e. that of 2018 - 2022 and consider the competition trends arising from strategic floorspace. This is a significant flaw in the Local Plan and its evidence, because such trends reflect the modern industrial market. Marrons refer at

² West Midlands Strategic Employment Sites Study 2024, and Coventry and Warwickshire Alignment Paper 2024

para. 12 of their report, that using this more recent data and extrapolating it forwards, would suggest strategic needs are 866ha within OA7 (with a figure for non-strategic needs to be added onto that. The figure – which the Development Needs Topic Paper suggests is 66.3ha), has not been tested because there is insufficient data within the evidence base to enable us to do this.

- 1.8. Putting these figures into the following tables show the range of shortfall and therefore undersupply within the emerging Rugby Local Plan.

	Proposed level of need (combined smaller sites and strategic needs) 2024-2045
Rugby Local Plan Preferred Options ³	284 ha
Completions Trend using Rugby AMRs from 2014/15 to 2023/24 ⁴	522 ha
Shortfall assessed against recent completions trends (522ha minus 284ha)	238ha

	Proposed level of strategic need for OA7 (2024-2045)
Rugby Local Plan Preferred Options ⁵	217 ha
Completions Trend using WMSESS data from 2011 to 2021/22 ⁶	436 ha
Take Up Trend using WMSESS data from 2018 to 2021/22 ⁷	866ha
Shortfall (difference between 217ha and the above trends)	219-649ha

- 1.9. Give that Rugby have decided to meet all of the OA7 shortfall (para 1.32 of Development Needs Topic Paper), it would follow that it would also meet all of the above calculated shortfall. This is particularly relevant given that Rugby is the last of the LPAs within the OA7 to reach this stage of the Local Plan review process. Coventry and Nuneaton & Bedworth (part of this area is within OA7) are both further advanced and neither are proposing to meet the OA7 needs. Indeed, as we will come onto later in these representations, Coventry has stated in its Proposed Submission Plan (2024) that it was unable to meet 45ha of its own needs. It states that it will look to work with other LPAs

³ 284ha as set out within the Development Needs Topic Paper

⁴ As referenced by Marrons, 2025, para 19 (Appendix 4)

⁵ 217 ha as set out within the Development Needs Topic Paper, and referenced in para 3b, Marrons 2025, Appendix 4

⁶ As referenced by Marrons, 2025, para 12 (Appendix 4)

⁷ As referenced by Marrons, 2025, para 12 (Appendix 4)

adjacent to it, to meet this requirement. Rugby's Local Plan remains the only Local Plan at a stage where such account can be taken of the adjacent authority shortfall.

- 1.10. To conclude, the evidence within the WMSESS, the Alignment Paper and the Council's Annual Monitoring Reports supports the conclusions within the Marrons Report (2025) that identifies the actual need for employment land is at least 436ha and could be as high as 822ha. Thus, with a shortfall ranging from 219ha to 649ha, the critical point is that the Council is planning on a level of employment land that is significantly below what past trends would suggest.
- 1.11. Stoford object to the Council's decision to allocate significant land within the Green Belt for employment development, when there are non-Green Belt alternatives available (para 147, NPPF). This represents the second strand to our case, (alongside an insufficient employment land need/supply) in support of an allocation at Rugby East.

Key Point 2

The decision to allocate Green Belt land is not consistent with the presumption in favour of sustainable development as required by the NPPF.

- 2.1. The NPPF sets out the Government's planning policies for England and how these should be applied to plan making to provide for development in a sustainable manner. Paragraph 11 states that:

"Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects; [our emphasis]

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas 6, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 7; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

The decision to allocate Green Belt land is not consistent with the presumption in favour of sustainable development.

Conflict with NPPF Para. 11a

- 2.2. The employment allocations in the Green Belt under Policy S3, namely ‘Crown Fields Farm, Ansty’, ‘Ansty Park north’ and ‘Prologis Park West and Mountpark, Ryton-on-Dunsmore’, herein referred to as ‘Crown Fields’, ‘Ansty’ and ‘Prologis Park and Mountpark’ do not promote sustainable patterns of development.
- 2.3. These allocations are not within walking / cycling distance of a railway station, are poorly connected by public transport and are far from a district or local centre (see SA and Stage 2 Site Assessment Report within the Local Plan evidence base). As a result, these sites will be heavily reliant on the private car and will not help to address climate change. These allocations will further fail to support the presumption in favour of sustainable development because they will unnecessarily remove land from the Green Belt, (noting that no additional land is being replaced) and therefore, allocations in the Green Belt will most certainly not improve the environment as NPPF paragraph 11a requires.
- 2.4. By comparison, the adopted Rugby Local Plan (2019) directed the majority of growth to Rugby town with a small proportion of housing growth to six Main Rural Settlements in the Green Belt. Employment sites within Rugby’s Green Belt were directed only to previously developed sites comprising the former Peugeot Site in Ryton and former Rolls Royce site in Ansty known as Ansty Park. The adopted Local Plan (para 4.29) states:

“Rugby town is the most sustainable location for growth in Rugby Borough and this plan therefore seeks to maximise the potential of the urban area and land immediately adjacent to it to accommodate growth.”
- 2.5. This statement is just 6 years old, and there have been no changes of any significance that warrant a change of spatial strategy – Rugby town and the area immediately adjacent to it, remains the most sustainable location for growth. The Council provides no evidence to the contrary.
- 2.6. The urban growth focus of Rugby’s adopted Plan has allowed the Sustainable Urban Extension of Houlton to progress plans for 6,200 new homes. Employment at the Stoford site, Rugby East, would align with planned (and partly built) housing development, and the associated infrastructure at Houlton. It would provide doorstep job opportunities for Rugby’s residents, including those at Houlton.
- 2.7. Conversely, with the Local Plan locating the majority of new employment land within the Green Belt and not balancing this with sufficient land within and adjacent to the Rugby urban area, the Council has not aligned planned housing and infrastructure growth, with new job opportunities. This approach does not support a sustainable pattern of development as required by paragraph 11 of the NPPF.

Conflict with NPPF Para. 11b

- 2.8. Paragraph 11b of the NPPF sets out a requirement for objectively assessed needs for housing and other uses to be met in full, as well as any needs that cannot be met within neighbouring areas. Having regard to the level of protection afforded to the Green Belt, this requirement at 11b does not apply to protected areas, and these areas include the Green Belt (see footnote 7, to para 11b of the NPPF). In simple terms this means, providing for needs in full (in this case, employment needs), unless, when applying the other policies of the NPPF that protect areas (and those areas Footnote 7 tells us, include Green Belt), the application of those policies would provide a strong reason to restrict development. At this point is worth noting that development within the Green Belt, is generally inappropriate (para 154 NPPF reminds us). Thus, there is a strong reason to restrict development.
- 2.9. Secondly, para 11b(i) goes on to qualify the strong reasons for restricting development, in terms of scale, type or distribution in the plan area.
- 2.10. For ease of reference, we have duplicated para 11b below with our emphasis in **bold** to reflect the above comments.

Para 11b NPPF;

b) strategic policies should, as a minimum, **provide for objectively assessed needs for housing and other uses**, as well as any needs that cannot be met within neighbouring areas 6, **unless:**

i. **the application of policies in this Framework that protect areas** or assets of particular importance **provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 7;** or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 2.11. In conclusion, the decision to allocate the majority of new employment land in Green Belt locations is not reflective of a sustainable pattern of development as required by para 11 of the NPPF.

Key Point 3 (i)
The approach to releasing Green Belt land to meet the majority of employment land supply is not a result of effective strategic planning across LPA boundaries

- 3.1. Paragraph 24 of the NPPF requires effective strategic planning across local planning authority boundaries to address key spatial issues. The strategic employment needs of OA7 (set out within the WMSESS) extend across Rugby Borough and Coventry City

(in the main) and constitute a key spatial issue which warrants effective strategic planning across these authorities.

- 3.2. However, there is no evidence to prove that the Councils' within OA7 have worked together, via a Duty to Cooperate Statement, Memorandum of Understanding, or other means of agreement.
- 3.3. There has also been no collaborative working between the LPAs to determine whether Green Belt releases on the Coventry / Rugby boundary constitute an appropriate strategy for meeting strategic employment needs. At the very least one would expect that the effects of the proposed allocations on the Green Belt (and the purposes of land being included within it) would have been tested to inform the proposed strategy and be part of the Sustainability Appraisal.
- 3.4. For these reasons, the Local Plan fails to meet the requirements of para. 24 of the NPPF.

Key Point 3 (ii)
The approach to release Green Belt, which underpins the strategy for employment land is not based upon evidence and is made without exceptional circumstances being demonstrated

- 3.5. Dissecting the above point, firstly the **approach** to releasing Green Belt, that then underpins the employment land strategy, is unjustified.
- 3.6. In their Cabinet report of 4th March 2025 (which sought approval to consult on the Local Plan) officers provide three exceptional circumstances to try and justify the employment allocations being proposed in the Green Belt. The first of these state:

(i) "As is identified above, 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, as detailed in the HEDNA 2022. Coventry is the largest population and economic centre in the FEMA and so provides the deepest labour pool. Coventry City Council itself, because of land constraints, is only able to allocate one strategic site for 25ha. Absent Green Belt constraints, a sustainable approach would allocate employment land close to Coventry as the main population and economic centre in the FEMA. By contrast, avoiding the Green Belt would necessitate only allocations which would be distant from Coventry and its labour force. This does not represent a sustainable approach."

- 3.7. The Cabinet report appears to centre strategic needs on Coventry. **This is a flawed approach** because in distributing strategic needs, the WMSESS was careful not to be specific in directing strategic needs to any one LPA. At para 4.10 the WMSESS states that the apportionment strategy was intentionally simplistic and high level (para 1.31

WMSESS). By contrast, the WMSESS apportions strategic needs to Opportunity Areas. These cover a wider geography and stretch beyond Coventry and in the case of OA7 comprises Rugby Borough and Coventry City together with a small part of both Nuneaton and Bedworth Borough and Warwick District.

- 3.8. Secondly the approach is **not based on evidence**. This evidence demonstrates that strategic employment needs can be met **anywhere** within this Opportunity Area and does not display any bias in support of development closer to Coventry City fringes, opposed to Rugby's urban area.
- 3.9. The strategic employment needs of OA7 do not constitute unmet needs from Coventry and, even if they did, Green Belt policies in the Framework protect Green Belt land and the presumption in favour of sustainable development (para 11 NPPF) is not engaged.
- 3.10. There is no requirement presented by the Council for the strategic employment sites to meet the WMSESS strategic needs in the Green Belt, close to Coventry City when the OA7 is expansive and covers a large proportion of non-Green Belt land where there are reasonable alternatives available. The Council has not tested a Scenario for growth (either in terms of distribution, nor to meet a higher level of need), that would comprise options adjacent to the Rugby urban area, alongside any residual needs, in the Green Belt where exceptional circumstances are demonstrated. We discuss this point further in our assessment of the Sustainability Appraisal.
- 3.11. Thus, the strategic employment allocations in the Green Belt are contrary to the NPPF and the Council's exceptional circumstance referred to above is invalid. It is possible for the Plan to be rectified and made sound if non-Green Belt allocations are made to address the strategic employment needs of OA7, and the Council demonstrates Exceptional Circumstances to justify any Green Belt releases thereafter. If it is accepted that employment land needs are higher than the 284ha that the Council currently state is the case, then in addition to allocations being made in sustainable greenfield and previously developed locations, there may be an opportunity for the Council to then consider Green Belt (including Grey Belt) locations and engage with Coventry to meet their shortfall.
- 3.12. We explore the absence of evidence further in the following paragraphs.

The Preferred Options plan has been prepared in the absence of up-to-date evidence, contrary to national planning policy.

- 3.13. Paragraph 32 of the NPPF relates to the preparation of, and review of Local Plans. It sets out a requirement for all review policies to be **underpinned by relevant and up-to-date evidence** (our emphasis). However, the strategy for employment land (policy S3) in the Preferred Options Plan, has been prepared in the absence of an up-to-date Green Belt Assessment. This represents a serious failure when the

strategy is centred on substantial Green Belt releases to satisfy the Council's purported needs.

- 3.14. There is also no available evidence on the identification of Grey Belt land, which, in accordance with paragraph 148 of the Framework should be prioritised ahead of other Green Belt locations when Green Belt releases for development are necessary. However, the identification of Grey Belt and its allocation (para 148 NPPF) is only triggered if paragraph 145 is satisfied – i.e. the mandatory step of identifying Exceptional Circumstances first.
- 3.15. The Green Belt employment allocations under policy S7 including Crowner Fields, Ansty and Prologis Park West and Mountpark are within areas assessed in the Coventry and Warwickshire Joint Green Belt Study 2015. The Joint Green Belt Study (2015) confirms that broad area 1, broad area 2 and RD3 contribute strongly to the purposes of the Green Belt, namely, checking the sprawl of Coventry (purpose a), preventing neighbouring towns merging into one another (purpose b), safeguarding the countryside from encroachment (purpose c) and assisting in urban regeneration by encouraging the recycling of derelict and other urban land across the West Midlands (purpose e). These areas are shown on the plan below and include broad area 1, broad area 2 and parcel RD3.

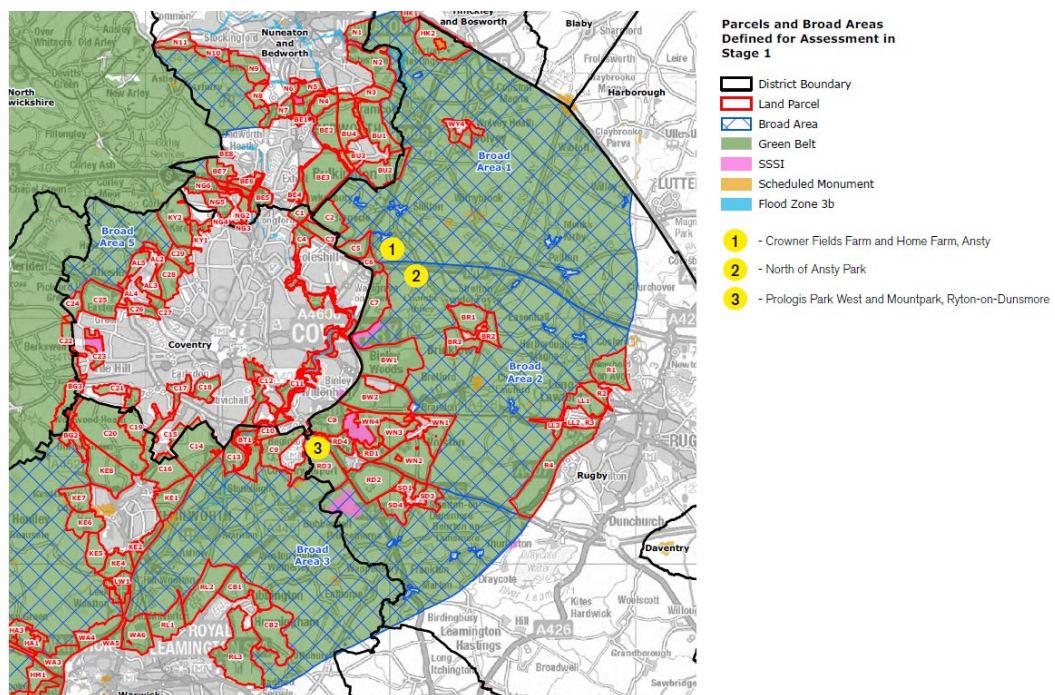


Figure 1: Annotated plan from Joint Green Belt Study (Stage 1 Final Report for Coventry City Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council and Warwick District Council)

- 3.16. Thus, the allocated employment sites do not constitute 'grey belt' because purposes (a) and (b) are engaged, and therefore Grey Belt status is not achieved in accordance with the NPPF.

- 3.17. In conclusion, there is no up-to-date evidence to justify the Green Belt focused strategy for employment land within policy S3 and consequently no regard to the approach to selecting Green Belt sites for development, that is advocated in national policy (para 148 NPPF) when Green Belt land is necessary for development.
- 3.18. The adopted Local Plan employment sites that exist in Rugby's Green Belt, close to Coventry's border, have been built on previously developed land only, comprising Prologis Park Ryton (former Peugeot plant) and Ansty Park (former Rolls Royce site). Such sites would now be considered as Grey Belt. The proposed allocations within the Preferred Options Local Plan are not on previously developed land.

Key Point 3 (iii)
Exceptional circumstances to justify development in the Green Belt do not exist

- 3.19. Paragraph 145 of the NPPF is clear that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Paragraph 146 explains that exceptional circumstances in this context include, but are not limited to, instances where an authority cannot **meet its identified need for homes, commercial or other development through other means.**
- 3.20. Neither the Preferred Options Local Plan or its evidence base provide exceptional circumstances to justify the need for Green Belt releases to support the proposed strategy for employment land at policy S3. Instead, we can only assume that the Council is relying on the exceptional circumstances (referred to at 2b of our representations) in their Cabinet report of 4th March 2025 (which sought approval to consult on the Local Plan) which states:

“Nonetheless exceptional circumstances are considered to exist justifying Green Belt release for the following reasons:

- (i) *As is identified above, 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, as detailed in the HEDNA 2022. Coventry is the largest population and economic centre in the FEMA and so provides the deepest labour pool. Coventry City Council itself, because of land constraints, is only able to allocate one strategic site for 25ha. Absent Green Belt constraints, a sustainable approach would allocate employment land close to Coventry as the main population and economic centre in the FEMA. By contrast, avoiding the Green Belt would necessitate only allocations which would be distant from Coventry and its labour force. This does not represent a sustainable approach.*

(ii) *The existing site at Ansty Park and the cluster of sites at Prologis Park Ryton, Middlemarch Industrial Estate, Coventry Gateway and Coventry Airport comprise regionally important mixed R&D, industrial and distribution locations. Allocating for expansion here has clustering and agglomeration benefits which would support more higher-skilled jobs and expansion in high value-added industries. These conditions are not replicable in more distribution-focussed locations along the A5 north of Rugby.*

(iii) *The site at Ryton could deliver a 55ha country park which is contiguous with the existing country park west of the Avon and would also link with Ryton Pools Country Park. No other site opportunity can deliver habitat creation on this scale. This supports the Corporate Strategy objective for a greener Rugby.”*

3.21. It is our view, that the exceptional circumstances presented are insufficient to justify the release of Green Belt, and certainly on the scale being allocated. For the reasons stated under 2b of our representations, exceptional circumstance (i) is not valid since the WMSESS evidence demonstrates that strategic employment needs can be met anywhere within this Opportunity Area and does not display any bias in support of development closer to Coventry City fringes, opposed to Rugby’s urban area. As such, there is no need for the development needs of OA7 to be in the Green Belt, unless the quantum of growth is increased to such a level (i.e. our suggested Scenario 4), that would engage the Exceptional Circumstances test and may then require Green Belt releases. Only after additional non-Green Belt sites have been allocated. We refer to Scenario 2 of the Sustainability Appraisal that highlights Rugby East as a non-Green Belt site.

3.22. Exceptional circumstance (ii) cites the potential for clustering of mixed R&D, industrial and distribution locations. This situation is not unique to this part of the Borough. With regards to the context of Rugby East on the doorstep of Daventry International Rail Freight Interchange (DIRFT), which offers rail freight connectivity, our site can offer the same, if not better, opportunities for clustering and provide a satellite site for DIRFT, and space for B2 uses as well as logistics uses. In addition, given the relationship of Rugby East to DIRFT, Rugby East can provide the same clustering and agglomeration benefits as the proposed expansion sites in the Green Belt - to support higher-skilled jobs and expansion in high value-added industries. Moreover, the location of jobs at Rugby East, opposed to the draft allocations in the Green Belt are more accessible by sustainable means of travel and would better serve Rugby’s residents opposed to Coventry’s.

3.23. Exceptional circumstance (iii) refers to ‘*the site at Ryton delivering a 55ha country park which no other site opportunity can deliver on this scale*’. We understand from the masterplan contained in the Vision Document for the site (submitted by those promoters as part of the Call for Sites process) that the 55ha includes all green infrastructure, including that in and around the buildings and is not solely to the west

of the scheme. The Council incorrectly considers that no other site can deliver green infrastructure on this scale. Our Rugby East site offers 60ha of additional parkland, and it is our intention for this to connect to Houlton strategic open space to the south and form a large country park.

- 3.24. Paragraph 147 of the NPPF requires the strategic policy-making authority to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries.
- 3.25. It is accepted that the Council has undertaken a Stage 2 Assessment of sites submitted as part of the Council's Call for Sites process. However, only a small number of these sites then featured within Growth Scenarios 1 – 3 that are detailed and assessed in the SA. We highlight within these representations, our grave concerns with the SA process (not informed by an up-to-date Green Belt assessment), the limitations of the criteria (i.e. no Green Belt criteria), the application of the criteria; and the failure of the SA (and the Plan) to consider a fourth scenario. Such a scenario should have been included and would have allowed the Council to consider the potential for meeting growth in excess of the 284ha the Plan states is needed (and we say is evidenced within the evidence base) and may have given rise to the Council allocating greenfield sites such as Rugby East. This would be in addition to, possibly highlighting further shortfalls which may lead to exceptional circumstances. However, this has not been done, and exceptional circumstances are not currently demonstrated.
- 3.26. Paragraph 148 of the NPPF states that *“where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations”*.
- 3.27. As set out in our representations we do not consider that exceptional circumstances exist to warrant changes to the Green Belt. Nonetheless, in the context of paragraph 148 we are also concerned with the Council's approach to reviewing its Green Belt boundaries. In the absence of an up-to-date Green Belt assessment the Council cannot have sequentially considered the suitability of grey belt land after previously developed land, before looking at other Green Belt locations. There is no evidence in the Preferred Options Plan, or its evidence base to demonstrate how the process of site selection in accordance with paragraph 148 has been undertaken. Again, this is a serious failure and does not comply with national policy.
- 3.28. Any review of Green Belt boundaries should also promote sustainable patterns of development to determine the appropriateness of a site's location (NPPF, para 148). As set out in these representations under para 2.2-2.11, no regard has been given to this fundamental principle as required by paragraph 11 of the NPPF.

- 3.29. For all the reasons provided in our representations we consider the Plan to be unjustified and inconsistent with national policy. The Plan does not present an appropriate strategy for employment land, take proper account of the reasonable alternatives and is not based on proportionate evidence. The employment strategy for growth does not enable the delivery of sustainable development and is inconsistent with the policies of the Framework. As such, the Plan fails the tests of soundness in respect of (b) justified and (d) consistent with national policy.
- 3.30. The Plan could be made sound if an appropriate strategy for employment land is progressed, which fully considers reasonable options outside the Green Belt before looking to the Green Belt, and includes the allocation of non-Green Belt employment land at Rugby East. Until such time, we strongly object to policy S3 and the allocations at policy S7 of the Preferred Options Plan.

Key Point 4

The employment land strategy (Policy S3) is not informed by a Sustainability Appraisal (SA) that meets the relevant legal requirements as required by the NPPF para 33.

- 4.1. Local Plans should be informed throughout their preparation by a Sustainability Appraisal that meets the relevant legal requirements¹⁸ (NPPF, para. 33).
- “This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued”.*
- 4.2. In line with the Regulations, a Sustainability Appraisal must be published for consultation alongside a draft plan that presents an appraisal of “the plan and reasonable alternatives” with a particular focus on appraising “significant effects” (Regulation 12(2)).
- 4.3. The Issues and Options Plan in 2024 identified 8 potential locations for strategic employment growth. These high-level options were not appraised in the SA Scoping Report accompanying the Issues and Options Plan and have not been tested in the Interim SA Report 2025.
- 4.4. Therefore, the Green Belt focused strategy for employment growth under policy S3 is completely untested. Equally the Local Plan and its SA have not tested a higher level of growth (than the 284ha for employment land), despite the evidence base before them pointing to higher levels of growth (WMSESS) and our evidence (Marrons 2024, Marrons 2025) and also Marrons critique of the WMSESS and Alignment Paper (supplied to the Council earlier in 2025). NB: The higher levels of need that we refer to here, are considered in further detail within our response to this policy S3, under the sub heading of ‘need’.

- 4.5. Nonetheless, the Council has adopted a preferred spatial approach which perversely favours development in the Green Belt (rather than first satisfying needs outside of the Green Belt before then looking towards it for growth options). The principle of developing in the Green Belt, despite the availability of reasonable alternatives is contrary to the NPPF.
- 4.6. Furthermore, the Interim SA Report is not fit for purpose and has been intentionally drafted to exclude the identification of significant adverse impacts on the Green Belt. The SA framework in the SA Interim Report includes sustainability objectives addressing economic, social and environmental matters (table 3.1). Whilst there is a topic on 'landscape' (which seeks to protect the countryside), this objective does not address the Green Belt, nor does any other. This omission is unjustified and inconsistent with the NPPF given its clear steer to protect the Green Belt unless exceptional circumstances are fully evidenced and justified (para 145).
- 4.7. Since the Interim SA fails to assess any of the housing and employment growth scenarios against an effect on the Green Belt, its effects on this element of national policy are neither considered nor accounted for. Given the quantum of land proposed for employment uses in the Green Belt (over 321ha), and the strength of the land's contribution to Green Belt purposes (evidenced in the Council's Joint Green Belt Assessment 2015), it is reasonable to assume that any appraisal of these sites against a Green Belt protection objective would result in significant negative effects. As per paragraph 33 of the NPPF, significant adverse impacts on objectives **should be avoided** [*our emphasis*] and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued first.
- 4.8. As demonstrated by employment land growth scenarios 2 and 3 in the Interim SA, alternative non-Green Belt sites are available which would eliminate all impacts on the Green Belt. The lack of regard for the protection of the Green Belt constitutes a significant failure of the SA which prejudices the results of the employment land growth scenarios that feature within it. Thus, the strategy for employment land (Policy S3) is not justified (para 36b NPPF). The SA fails to include an additional scenario that explores how an increased employment land need could be met, and whether this may require a combination of non-Green Belt and Green Belt sites. This option could be utilised to remedy shortcomings in the Local Plan, meet the higher growth needs that are evidenced, and allocate additional land within sustainable locations.
- 4.9. At paragraph 5.2.72 of the Interim SA, the Council refers to wider factors that will have a bearing on the broad spatial strategy [*our emphasis*] including an assessment of the Green Belt. This approach is incorrect because the NPPF is clear at paragraph 32 that the consideration of Green Belt should **underpin** the local plan strategy and not simply have a bearing on it.
- 4.10. Notwithstanding an up-to-date Green Belt assessment being absent, the Council makes no attempt to rely on the findings of the Joint Green Belt Study (Stage 1 Final Report for

Coventry City Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council and Warwick District Council) (2015) as an interim means to inform their spatial strategy. Besides the introduction of Grey Belt in national planning policy, the basis for a Green Belt assessment is unchanged and the five purposes of the Green Belt (NPPF, para143) remain as they were in 2015.

- 4.11. Turning to the Joint Green Belt Assessment 2015, the report notes that *'the West Midlands Green Belt has prevented the sprawl of Birmingham, Wolverhampton and Coventry, merging of surrounding towns and encroachment into the surrounding countryside'* (para. 2.12). The role of the Green Belt between Coventry and Rugby more specifically prevents sprawl from Coventry, the merging of Coventry and Rugby, the merging of other neighbouring towns and settlements within the Borough, and encroachment into the countryside.
- 4.12. The Green Belt allocations in policy S3 of the Preferred Options Plan were within parcels of land that were included in the 2015 Green Belt assessment. Those parcels were assessed against the purposes of the Green Belt (which remain unchanged in the most recent NPPF).
- 4.13. The Crowner's Fields Farm site is located within a much larger assessment parcel than the current allocation, known as Broad Area 1. This Broad Area was considered to contribute to the following purposes of Green Belt:
 - Checking the sprawl of Coventry, Nuneaton, and Bedworth,
 - Safeguarding the countryside, and
 - Assisting urban regeneration by encouraging the recycling of derelict and other urban land across the West Midlands.
- 4.14. The Ansty Park north allocation was also assessed in the Joint Green Belt Study as part of much larger area of land, known as Broad Area 2. This broad area was considered to make a considerable contribution to all five purposes of Green Belt.
- 4.15. Notably, para. 142 of the NPPF reminds us that the *'fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open'. The parcel within which the Crowners Field Farm site is located, meets this fundamental aim of land being within the Green Belt.'*
- 4.16. The Joint Green Belt Study 2015 included an assessment of one particular single land parcel, under a reference RD3. This parcel of land is also the same as the Prologis Park West and Mountpark proposed allocation. Thus, despite predating this Local Plan by some 10 years, the assessment is site specific, and the findings are accurate and wholly applicable to this site allocation.
- 4.17. This site/parcel was considered to contribute strongly to Green Belt purposes (a), (b) and (e), and moderately to purpose (c) as per the table below, replicated from the 2015 Joint Green Belt Study.

Green Belt Purpose	Score
a) to check the unrestricted sprawl of large built-up areas	3/4
b) to prevent neighbouring towns merging into one another	4/4
c) to assist in safeguarding the countryside from encroachment	2/4
d) to preserve the setting and special character of historic towns	0/4
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	3/4
Total Score	13/20

Joint Green Belt Study (Stage 1 Final Report for Coventry City Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council and Warwick District Council) (2015)

- 4.18. The site scores highest against purpose (b). On this matter the 2015 Green Belt report states:

“The parcel sits between the village of Ryton-on-Dunsmore to the east and Middlemarch Business Park (connected to Coventry) to the west. Measured from the junction between Oxford Road and London Road to the east of the northern end of the parcel, which represents the westernmost extent of the new industrial extension to the village of Ryton-on-Dunsmore, the gap between the two neighbouring settlements is as narrow as 600m.”

- 4.19. Based on these findings, the site cannot be considered ‘Grey Belt’ in the context of paragraph 148 of the NPPF and its definition in Annex 2. As directed by paragraph 148, where it is necessary to release Green Belt land for development, previously developed land should be given priority, then Grey Belt, followed by other Green Belt locations. The status of this site (i.e. ‘other Green Belt location’) places the site sequentially last, if the Council had first made the case of Exceptional Circumstances and needed to release Green Belt land in the first instance.

- 4.20. The Prologis Park West and Mountpark site (RD3) will continue to contribute strongly to meeting Green Belt purposes in any updated Green Belt Study since its immediate setting and landscape qualities remain largely unchanged since the 2015 assessment was prepared.

- 4.21. It is worth noting at this point that a draft allocation of 1,500 homes and 55ha of employment land in Rugby’s Green Belt, on the border of Coventry, known as Walsgrave Hill Farm (WHF) was withdrawn by Rugby Borough Council at the Publication stage of the now adopted Plan. This decision was endorsed by the Local Plan Inspector who commented on the draft allocation in his report. Of particular importance he noted:

“The A46 on the east side of the city represents a strong, clearly defined boundary. The sites promoted on the edge of Coventry, including WHF, would breach this boundary extending Coventry into the countryside on the eastern side of the A46, causing significant harm to the purposes of the Green Belt in this location in checking the unrestricted sprawl of Coventry and safeguarding the countryside from encroachment. The fact is that Rugby’s apportionment of the unmet housing needs of Coventry can be met in sustainable locations outside the Green Belt and

on smaller scale sites at the MRSs [main rural settlements], which I conclude under Issue 5 would not lead to unacceptable harm to the purposes of the Green Belt.”

- 4.22. Notwithstanding the Council’s decision to withdraw the draft allocation at Walsgrave Hill Farm in 2019, the Inspector confirms that exceptional circumstances did not exist to justify the release of significant areas of Green Belt land for a development that was not required to meet local or sub regional employment or housing needs. The same argument applies this time around since the Council can (but has chosen not to) allocate sites outside of the Green Belt. It should have tested growth scenarios within the SA that did not include Green Belt release, and it did not. It also did not test for a higher growth scenario that look at accommodating more than 284ha of employment land needs, as per the evidence base. The opportunity to allocate non Green Belt sites including Stoford’s ‘Rugby East’, to satisfy strategic and local employment needs could have been exercised without the need for Green Belt releases. Thus, as before, exceptional circumstances do not exist to justify the employment allocations made in the Green Belt.
- 4.23. The A46 continues to form a strong, clearly defined and defensible boundary that would be breached as a result of development to the east of this. This would extend Coventry into the countryside, causing significant harm to the purposes of the Green Belt in this location - i.e. in checking the unrestricted sprawl of Coventry and safeguarding the countryside from encroachment.

Key Point 5
The employment land growth scenarios in the Interim SA are not justified or effective

- 5.1. The Council’s Interim SA report is based on three employment land growth scenarios comprising:
1. The emerging preferred option (PO) involving allocation of Sites 95, 64, 17, 14 and 328.
 2. The PO but replace Site 328 (Prologis Park West and Mountpark) with Site 130 (North of Houlton), and;
 3. The PO but replace Site 328 with Sites 18 and 133 (A45/A4071 junction southwest of Rugby).
- 5.2. We strongly object to the Council’s appraisal of the employment land growth scenarios and consider there to be fundamental errors in each assessment, and vital Green Belt evidence missing to inform the outcomes. Our critique of the employment land growth scenarios at **Appendix 3** to these representations. In summary we believe that Scenario 2, land at north of Houlton (site 130) has been wrongly discounted even though it offers a greenfield, non-Green Belt site opportunity with acknowledged (in the SA) demonstrable linkages to public transport and the growing community of Houlton.

- 5.3. We also note that the Interim SA does not include a fourth scenario that tests how a higher level of employment growth could have been accommodated within the Borough. A higher growth scenario would reflect the evidence base that we highlight in our Key Point 1, at the beginning of this policy objection. Such a scenario, in our view, may have identified brownfield, greenfield, and potentially Green Belt sites to satisfy a greater need, and also address the unmet shortfall of 45ha arising from Coventry, documented in their proposed Submission Plan.
- 5.4. We also object to the SA process used to define the growth scenarios. The Interim SA includes four ‘constant’ employment sites that do not form any part of the employment growth scenario appraisals (i.e. the focus is only on those site allocation options that are variable).
- 5.5. The ‘constant’ employment sites comprise:
1. Crowner’s Fields Farm (Green Belt),
 2. Coton Park East (non-Green Belt) (Site 64),
 3. South West Rugby (non-Green Belt) (Site 17), and;
 4. Ansty Park North (Green Belt).
- 5.6. Crowner’s Fields Farm benefits from a recent resolution to grant planning consent and therefore, with a greater certainty of a planning permission, it is reasonable to be included as a ‘constant’ in the employment land growth scenarios. Conversely, whilst Coton Park East is allocated in the adopted Plan, this is for residential uses without the benefit from a planning consent, and its suitability for employment use has not been tested within the SA.
- 5.7. Equally, whilst the safeguarded land at South West Rugby is also allocated in the adopted plan, this area was identified to provide a balance of housing to jobs, to meet housing or employment needs because of changing demands beyond 2031. This land, like Coton Park East has been ‘accepted’ in the SA for employment uses without any assessment of its suitability against current market conditions.
- 5.8. Further, in respect of Coton Park East (Site 64) and South West Rugby (Site 17), the Interim SA, at section 5.2, refers to these sites being suited to delivering large-scale logistics, which serves to emphasise the need for other allocations (beyond these two sites) to be focused on suitability for ‘general industrial’. Yet, the Local Plan then allocates these sites (17 and 64) for ‘general industrial’ and allocates other land (in the Green Belt) for large scale logistics.
- 5.9. There is no evidence to support the inclusion of Ansty Park North as a ‘constant’ in the employment land growth scenarios within the SA. The Council makes only one reference - which states the site is:

“very strongly supported as there is a need to build on the success of Ansty Park”. (para 9.2.32)

- 5.10. This approach does not promote a sustainable pattern of development as required by NPPF, paragraph 11a.
- 5.11. For the reasons above we contend that the approach to ‘constants’ in the SA is biased and unjustified.
- 5.12. We have concerns that the Interim SA has predetermined the allocations in the Local Plan without following due process as required at paragraph 33 of the NPPF. At paragraph 5.2.42, the Interim SA states that:

“even at this early stage in the process (of defining growth scenarios) [the sites] can be placed in a broad sequential order of preference:”

- **SW Rugby SUE**
- **M6 Junction 1 (Coton Park East)**
- **M6 Junction 2**
- **Prologis Park, Ryton**
- **North of Houlton**

- 5.13. However, these early assumptions are reached ahead of the nine employment growth options being fully considered.

Policy S7 Employment Allocations

1. Policy S7 proposes the following allocations for employment. We have taken the information from the table within Policy S7 and added in additional columns comprising notes (whether the site is greenfield, Green Belt etc.); and we have converted the amount of floorspace using the 0.35 plot ratio (as referenced in the Development Needs Topic Paper) to demonstrate how much actual land is needed to serve that amount of floorspace. Finally, we list the actual size of the allocation as per the Local Plan Appendices. This exercise is helpful because it has demonstrated that the sqm/ha of new allocations is equivalent to 270ha (the need being 284ha as per Policy S3) but the actual volume of land allocated is greater – at 397.68ha. This is to be expected (i.e. that there is a difference) because of matters such as strategic landscaping and infrastructure, outside of regular plot densities. It also helps in assessing the deliverability of the site when considering the ratio of floorspace to green infrastructure, its viability, the policy implications of certain densities and how achievable such a development quantum might be given certain site constraints.

	Notes	Floorspace Allocated (net – sqm)	Floorspace Needed (on a 0.35 ratio) (hectares)	Allocated in draft Plan appendices (hectares)
Crowner Fields Farm (Frasers)	Green Belt Release, resolved to grant permission, VSC, end occupier	275,000	78.6	112.18
Coton Park East	Greenfield site, former residential allocation	115,000	32.9	35.97
South West Rugby Phase	Greenfield site, former reserve site at SW Rugby (Tritax Symmetry)	130,000	37.1	40.7
Ansty Park North (ring fenced for R&D and B2 uses)	Green Belt release, adj to Ansty Park, adj to J2 M6	75,000	21.4	36.94
Prologis Park West and Mountpark, Ryton on Dunsmore	Green Belt release, adj to Prologis Park Ryton, adj to a45	350,000	100	171.86
New Allocations			270 ha	397.68 ha

2. Crowners Fields Farm

- 2.1. Page 117 sets out the site area for this allocation, the volume of floorspace and the development requirements. This allocation is not a new employment land allocation as is stated in para 1.18 of the Local Plan. It is a site for which a Resolution to Grant planning permission for a specific end user has already been made. It fundamentally should not form part of the supply of sites being used to balance the employment land needs of Rugby (or indeed OA7). The site is within the Green Belt and as part of the case made by the applicants – the Frasers Group, they prepared and it was accepted

by the Council, that there were Very Special Circumstances (VSC) for the site to be granted planning permission.

- 2.2. The need for the site was stated as being 'urgent' by the Applicants in their submission material. This was part of their VSC case. It was not a floorspace requirement therefore that was to be satisfied through the plan making process – which is naturally lengthier and will not be resolved for some time to come. It is also not the case that this level of need is a need upon which the Local Plan's level of need is established. The allocation is some 275,000sqm – almost half of the suggested level of need within the Local Plan, and it has arisen from an occupier from outside of Coventry and Warwickshire, and indeed the West Midlands. It cannot therefore be justified or effective for the Local Plan to count the Crowners Field Farm site as a component of the new employment land allocation and supply towards meeting the Local Plan requirement that stems from a West Midlands based assessment.
- 2.3. Assuming permission is forthcoming, the site should not form part of the land supply. A VSC case was made and accepted by the Council for this site, and in our view the site should remain as a development site for a specific end user, within the Green Belt. It is not a site for which exceptional circumstances are evident, to support its release within the Local Plan process.
- 2.4. Unlike the benefits offered by the Stoford promotion site at Rugby East – (see Appended Delivery Document - **Appendix 2**), the Crowners Fields site does not offer a Country Park, or open space within walking and cycle distance of a Rugby settlement akin to Houlton – some 6,000 new homes. The site does not include provision for, nor offer to make a financial or off-site contribution towards Gypsy and Traveller provision. The site is also being developed for the needs of a specific end use – the Fraser Group, and therefore unlike Rugby East, does not offer opportunities for smaller/medium sized businesses to locate on site, a need which is acknowledged as needing to be met within the Council's evidence base.

3. Coton Park East

- 3.1. Page 114 sets out the site area for this allocation, the volume of floorspace and the development requirements. The Local Plan states that the site area is 35.97ha, within which 115,000sqm of employment floorspace will be delivered. However, at a plot ratio of 0.35, this would require 32.9ha of land, leaving just 3ha. Page 114 also advises that the site should deliver 1.6ha of land for a Gypsy and Traveller Site and the expansion of the Rugby Free School. This would leave just 1.4ha of land for structural landscaping, Biodiversity Net Gain. In short, the site area will not enable the delivery of 115,000sqm of floorspace as is stated. The allocation is not achievable in the parameters of the text at page 114.
- 3.2. Moving on to site constraints, this also gives rise to further significant concerns regarding the deliverability of this employment land allocation. As a former residential

allocation, it is notable that it has failed to deliver new homes. This is despite the Borough seeing record levels of delivery (AMR 2024) where the annual requirement for homes of 664 dwellings per annum, has been exceeded every year since the Local Plan was adopted in 2019. The developability of the site must be brought into question.

- 3.3. Whilst it is noted within the Stage 2 Site Assessment that the site has relatively strong public transport accessibility, National Highways have not provided any comments on the site. Being located in the north of the Borough, traffic leaving the site will have the potential to route via Gibbet Hill. The allocation makes no reference to the site offering mitigations for impacts on this known highway concern.
- 3.4. On site, the challenges continue with the site having significant slopes which will require an earthworks exercise that will result in further ecological mitigation, in order to deliver the plateaus that employment floorspace requires from a site.
- 3.5. Overall, our view is that the site is more suited towards residential use (which can utilise the sloping nature of the site) and benefit from proximity to the school whilst allowing for its expansion. It is not a suitable employment allocation, and will not be effective in delivering the 115,000sqm that the Local Plan policy S7 states.

4. South West Rugby

- 4.1. Following a review of the Council's Stage 2 Site Assessment report, and given that the site is currently Safeguarded, we offer no objections to this draft allocation.

5. Ansty Park North

- 5.1. Page 116 of the Local Plan provides details of this 36.94ha allocation.
- 5.2. We note in respect of the Ansty Park North site, that the Stage 2 Site Assessment comments that there is a high level of concern in respect of strategic highways network impact. However, the Strategic Transport Assessment for the Plan is not yet available for us to consider this point further. The site is also measured within the Stage 2 Site Assessment as being less accessible for public transport.
- 5.3. Ansty Park represents a redevelopment of previously developed land. Notwithstanding the successful delivery of the business park to date, the proposed extension to Ansty Park, by way of this allocation, requires the release of Green Belt. The Council have not demonstrated that the allocation is based upon Exceptional Circumstances. There is no evidence to state why this parcel of land and why this quantum. Within the adopted Local Plan, Ansty Park was allocated to redevelop a brownfield site and meet needs arising from Coventry – they were the exceptional circumstances. No such request from Coventry has been made of Ansty Park within

the evidence base for this Local Plan and the site area does not equate to meeting the shortfall of 45ha within Coventry's Plan.

- 5.4. The site is allocated for research and development uses only. There is no specific evidence-based report to warrant this, and therefore if this element of the allocations is deemed to warrant Exceptional Circumstances, the Council's current evidence that underpins the Local Plan remains incomplete.

6. Prologis Park West and Mountpark, Ryton on Dunsmore

- 6.1. Page 119 of the Local Plan allocates 171.86ha of Green Belt land to deliver 350,000 sqm of floorspace. The Local Plan states that within the allocation, there will be a 55ha country park, 8,000sqm of the floorspace will be for small and medium sized buildings, lorry parking facilities, and 0.4ha of land for Gypsy and Travellers.
- 6.2. The Stage 2 Site Assessment states that there is a high level of concern in respect of strategic highways network impact. However, the Strategic Transport Assessment for the Plan is not yet available, and we cannot comment further on this matter at this stage.
- 6.3. Whilst being the largest new employment allocation made within Rugby, it is concerning that the Stage 2 Site Assessment measures and records the site as being less accessible for public transport. Such limitations will encourage the use of the private car moreover, and this is contrary to the climate change agenda that the Local Plan is seeking to embrace. In addition to the loss of Green Belt (detailed separately within this objection under our Green Belt comments, the site is also within 500m of a SSSI, which the Stage 2 Site Assessment concludes as giving high concern in respect of ecological constraints.
- 6.4. A key driver of the allocation appears to be that of a country park. This is cited within the March 2025 Cabinet Report, and the SA, amongst the suggested merits of the Local Plan allocations. However, upon measuring the area of non-built form within the masterplans submitted in the Call for Sites process, it is evident that every part of the non-built form is required within the allocation to deliver the 55ha quantum of country park that is stated. It is not only the land that is located within the River Avon floodplain and the western edge of the proposed buildings. This is important because the offering of a country park is done so as a suggested level of mitigation for the loss of over 170ha of Green Belt land. The reality is that the Country Park offering is primarily a narrower area of land to the western side of the site, within the flood plain of the River Avon.
- 6.5. Exceptional Circumstances for the development of this site, within a Green Belt location have not been made within the Local Plan. This point is explored in further detail within our section of these representations concerning Green Belt. However, given this and the above mentioned reasons, the site is not justified in its allocation

as a new employment site to meet the identified employment land needs of Rugby and its residents. It is located as far away from the urban area as can be achieved, before one enters the area of Coventry. It is not located to serve Rugby's residents or provide them with the necessary job opportunities to serve the areas where the majority of the population reside. Neither is the site sustainably linked to those locations by bus, rail, bike or foot.

7. In summary, the above commentary on the new employment land allocations listed within Policy S7 outline our concerns regarding their deliverability, their effectiveness, and or the justification for their allocation. Further commentary is listed within these representations in respect of those sites that are located within the Green Belt, given that Exceptional Circumstances have not been made by the Council. We also comment on the application of the Sustainability Appraisal process and the evidenced based document that fails the legal requirements as we also explain within these representations.
8. Stoford have provided as part of these representations, a Delivery Document in respect of land that we are promoting north of Houlton, on a site referred to as Rugby East. Within that Delivery Document (**Appendix 2**) we outline the key benefits of the site, should it be allocated. We consider that there is a compelling need for additional land to be allocated within this Local Plan, noting the shortfall identified in our response Policy S3, and the commentary here to S7.
9. The allocation of the Rugby East site will deliver:
 - 135ha of strategic employment land with a potential 60ha in the first phase
 - A5 improvements to provide access and improve the safety of existing junction
 - Support to the delivery of the approved Rugby Parkway Station
 - A mix of unit sizes to meet the needs of small and medium sized business in addition to logistics which will support the national offering at DIRFT – via a 'hub and spoke' model
 - A Country Park of 60ha with the potential to offer alongside open space at Houlton, an extended area of parkland for recreation purposes
 - A sustainable travel modes hub that supports a fully integrated public transport strategy and;
 - The provision of land to accommodate gypsy and traveller pitches on site, or off site if required

A full overview is within our Delivery Document at **Appendix 2**.

S4 Sites for Gypsies and Travellers

1. We support policy S4 and understand the need for new pitches in the borough to assist in meeting the shortfall in provision identified in the Gypsy and Traveller Accommodation Assessment 2025. Rugby East can provide 1 – 2 acres of land for gypsy and traveller provision, in an accessible location off the A5, with walkable links to key services and facilities.
2. Any site at Rugby East would provide adequate provision of on-site services for water supply, power, drainage, sewage and waste disposal, and its scale would allow for adequate outdoor amenity space, privacy and necessary on-site facilities.
3. Alternatively, an off site financial contribution and / or land to meet this policy requirement can be offered.
4. Our accompanying Delivery Document (**Appendix 2**) provides more information about how Rugby East can assist in meeting the needs of gypsy's and travellers.

CL2 Renewable Energy and Low Carbon Technology

1. We note that parts of our Rugby East site (land north of Houlton, site 130) have been identified as suitable for wind turbine development.
2. As a recognised strategic employment site that has been deemed as potentially suitable for future employment uses, an allocation for wind turbines on Rugby East would prejudice delivery of this site in the future. Other sites that are less sustainable, have less development potential and weaker connectivity to the strategic road network should be favoured for wind turbines instead of Rugby East.
3. Our proposals at Rugby East offer a multitude of sustainability measure to address climate change, including but not limited to PV panels, energy efficient buildings, net zero carbon in operation and an abundance of green infrastructure. Further details on how our proposals address climate change are contained in our accompanying Delivery Document (**Appendix 2**).

S5 Countryside Protection

1. We object to criterion B of policy S5 which delineates the extent of the Green Belt in the Borough on the policies map and effectively removes land from the Green Belt for the employment sites at Crowner Fields Farm, Ansty Park north and Prologis Park West and Mountpark. As set out in our representations, exceptional circumstances to justify the release of land from the Green Belt do not exist.

E2 Employment Development

1. We object to this policy which limits the development of employment floorspace in locations that are outside of settlement boundaries. Where land is not protected by designations such as those listed within para 11g footnote 7 of the NPPF, then the Plan and planning policies should be:

'flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances' paragraph 86 e of the NPPF advises.

2. Furthermore, policies and decisions should:

'recognise and address the specific locational requirements of different sectors. This includes making provision for:

a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections);

b) storage and distribution operations 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; and

c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.' (NPPF, Para 87)

3. Therefore, if policy E2 remains as drafted, the policy does not permit the development of employment floorspace outside of settlement boundaries (except for where it satisfies four very specific criteria). This approach is restrictive and not consistent with paragraph 86 or 87 of the NPPF. It does not acknowledge and facilitate the expansion or modernisation of other industries as cited above, and it does not support economic growth and resilience. By way of example, the 2019 Adopted Plan could not have foreseen the Covid 19 pandemic, and the accelerated impacts that had on the need for floorspace and the growth in logistics. It is imperative that the policy is amended to allow for flexibility and the demand of the market, particularly where locations may not be readily available elsewhere within the Borough.

Infrastructure

I5 New Railway Stations

1. Stoford strongly support Policy I5 and criterion C, which states that the ‘development of the new Rugby Parkway Station as shown on the Policies Map will be supported.’ We are supportive of the Rugby Parkway Station because it provides a critical non car-based opportunity to access rail, and this connects to the town centre station (Rugby), along with neighbouring stations at Coventry for example. Encouraging Rugby residents to use the train as opposed to the private car, for means of accessing work, or leisure will significantly help to address the climate change agenda within the Borough.
2. It will support journeys in particular for residents in Houlton, the largest sustainable urban extension that is currently under construction and where significant numbers of residents already reside. It will also facilitate people travelling to this part of the Borough, where they may then pick up connections to work at DIRFT, and there is the significant opportunity for the Council to facilitate more job opportunities in this location, through the allocation of new employment floorspace at Rugby East.
3. However, at present, no additional development with the potential connectivity offered by Rugby East, is being proposed within the emerging Local Plan. This is contrary to the emphasis of the NPPF that requires plan making to promote sustainable patterns of development when allocating sites.