

Preferred Option Consultation
Development Strategy Team
Town Hall
Evreux Way
Rugby
CV21 2RR

By email only to [REDACTED]

19 May 2025

Dear Sir / Madam,

Our Ref –
RRS007/AM/HA

**RE: RUGBY BOROUGH COUNCIL LOCAL PLAN REVIEW –
PREFERRED OPTIONS CONSULTATION**

On behalf of our client, SUE GP LLP, we are pleased to enclose these representations in response to the above consultation, to inform the emerging Rugby Borough Local Plan Review in due course.

SUE GP LLP are Master Developers of Houlton, which benefits from outline planning permission (OPP) (ref: R17/0022) for up to 6,200 homes, commercial and employment floorspace and a wide mix of complementary land uses and green infrastructure.

This vibrant community now hosts new homes, Houlton School (6FE Secondary School), St Gabriels Primary School, Dollman Farm Local Centre including restaurants, offices and community facilities, and a vast network of pedestrian and cycling routes through the extensive areas of open space and wildlife corridors.

The following representations are principally made in this context, in order to ensure the emerging Local Plan supports the continued delivery of Houlton. Comments are provided in relation to both the emerging policies in the Preferred Option Consultation Document and the draft Policies Map.

For the Policies Map, a number of misaligned boundaries have been identified which are inconsistent with the existing, approved and/or implemented features on-site. Therefore, **Appendix A** to this letter includes a series of Plans which provide more accurate information, in .pdf and .dwg formats (as relevant). If it would be helpful to



review these together, we are more than happy to arrange a meeting (in-person or virtual) to explain our rationale further.

Representations

Overall, SUE GP LLP supports the direction of the Local Plan Review and the increased emphasis on social and environmental sustainability embedded within the emerging policies. Our representations focus on the following key themes:

- Housing
- Social Infrastructure
- Natural Environment
- Sustainability
- Policies Map

Housing

In January 2025, SUE GP LLP put forward a parcel of employment land within the Houlton OPP area (south of the A428) for consideration as part of the Call for Sites process, for an alternative residential use. We therefore strongly support the proposed allocation of the site for the delivery of up to 250 homes on land to the south of Crick Road (ref: 338) under emerging policy S6. SUE GP LLP are committed to delivering high-quality housing development set within a network of green spaces at Houlton, including on the proposed allocation site. Its location in close proximity to the future Rugby Parkway station and the community, education and open space facilities at Houlton will allow its development as a sustainable, well-connected addition to the Houlton community.

One of the design criteria within the proposed allocation is the creation of a pedestrian access from this site to the new Rugby Parkway station. The Houlton OPP secures a pedestrian/cyclist link running along the Crick Road (A428) that will provide an active travel connection to the new station. This is consistent with the Rugby Parkway station proposals which also envisage a north-south pedestrian/cyclist link across the A428 connecting from Station Avenue to the station. In this context, the proposed allocation site will be well-connected to the station via the A428 route, such that a second connection is not necessary. This draft allocation criterion should therefore be removed.

Further, the proposed site boundary shown on the draft Policies Map does not align exactly with the parcel boundary provided through the Call for Sites, with a set back from the A428 and railway incorrectly indicated. We would be grateful if the correct boundary can instead be used, as shown on **Plan 02** in Appendix A.

Should you require any further information to support this site's allocation as it progresses through future plan-making stages, please do not hesitate to get in touch.

Social Infrastructure

Emerging policy C3 (Local and District Centres) sets the expectation for new developments in defined District and Local Centres to include ground floor town centre uses, with residential or office uses above, which shall thereafter be protected against loss or change. This unilateral

approach to the design of mixed-use developments is likely to be challenging to implement in practice and, from our experience in delivering Dollman Farm and other Local Centres in various sites across the country, the importance of sufficient flexibility in policy cannot be understated.

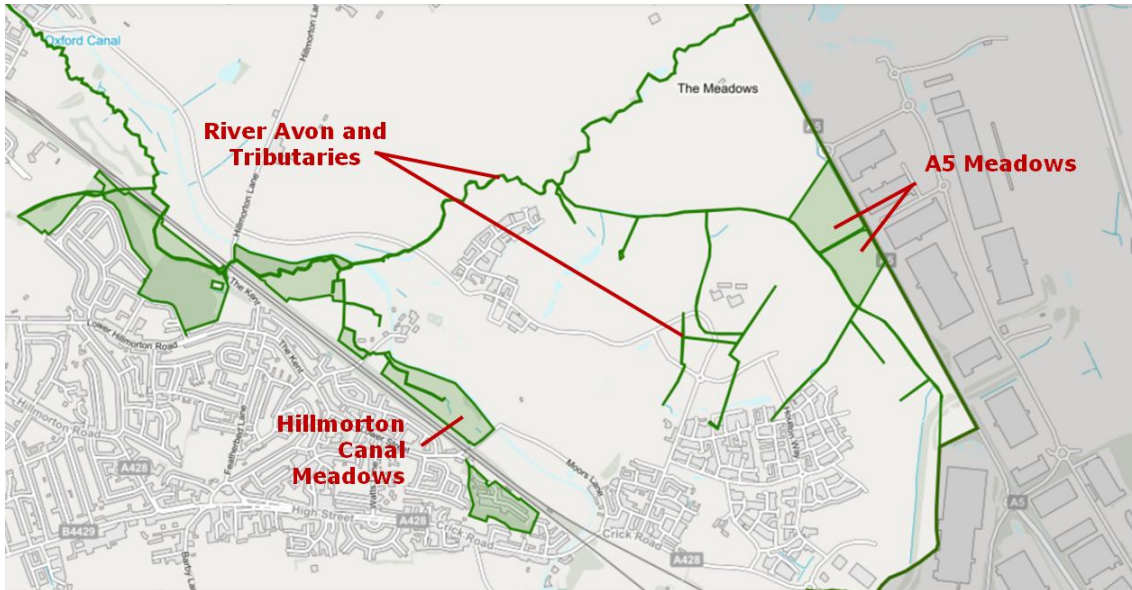
Such flexibility allows these critical Centres to be delivered, and thereafter adapted, in a way that is responsive to design trends, site conditions, community appropriation and to keep pace with the needs of the market. Ground-floor uses with residential or offices above may work in many locations, and be inherently unviable or undeliverable in others and this is down to the site context and any practical constraints (e.g. height, access) which may affect the scale and layout of these Centres. It is therefore important for the emerging policy to recognise the importance of retaining mixed uses in these Centres, but we would caution against requiring a vertical distribution of uses for **all** new developments.

The associated Policies Map layer identifies the Houlton District Centre and Dollman Farm Local Centre. The District Centre boundary is slightly incongruent with the District Centre Key Phase Definition Statement approved via the discharge of condition application (ref: R22/0364) and should be amended to align with the approved boundary, enclosed as **Plan 03** in Appendix A. It should be noted that the District Centre has not yet been delivered and its scale, layout, mix of uses and design is still subject to iterative design testing.

The Policies Map's Dollman Farm Retail Centre boundary erroneously extends beyond the centre to encompass existing areas of formal open space, a play area and future residential parcels. No commercial development is proposed on this land to expand Dollman Farm and therefore the retail centre boundary should be updated to reflect that shown in **Plan 04** in Appendix A. This is consistent with the boundary submitted with the final Dollman Farm application (ref: R16/0868) and encompasses all the built commercial elements of that Local Centre.

Natural Environment

Emerging policy EN1 protects against developments that would result in harm and/or loss of Local Wildlife Sites (LWS) unless it can be demonstrated that the benefits outweigh the harm; development cannot be located elsewhere; or harm is minimised, mitigated or compensated for. Whilst we have no material objection to the policy provisions (they are consistent with adopted policy NE1), we note the Policies Map has been updated to show LWS designations set by Warwickshire County Council (WCC) ([link](#)) – per the below extract.



The River Avon and Tributaries LWS designation and the enlarged Hillmorton Canal Meadows LWS, as currently drawn, do not correlate with existing site features. WCC's LWS designations rely on outdated survey information (from 2010) which, as a result of site-wide redevelopment in the intervening period, are no longer considered accurate.

The tributaries, for example, cut across areas of Houlton that have either been developed or have outline permission to develop. Many of the features (ditches) previously identified as forming part of the LWS have since been lost, either to built form or ground remodelling. Irrespective of whether they could have historically been considered 'tributaries' (considered below), these lost features clearly do not serve the same function now. It would be appropriate for the LWS boundaries to be reconsidered in this light. Importantly, the proposals at Houlton continue to deliver extensive new areas of wetland within wildlife corridors. To the extent that 'tributaries' could be considered as present within the Houlton site, it would be within these wildlife corridors and informal open space adjacent to them.

As a broader observation, the River Avon and Tributaries LWS is, as the name suggests, designated on account of the River Avon itself, and the tributaries which support it. A tributary is defined as a "*stream or river which flows into another (parent) river*". Except for the Clifton Brook and Clifton Brook Tributary, the LWS features identified within Houlton comprise seasonally wet agricultural ditches. These ditches do not fit the definition of a stream or river and would not be reasonably defined as a tributary to the River Avon, and they would provide a negligible contribution to the Avon's catchment (if any). In isolation, these ditches have not historically been recorded to support notable floral populations, nor populations of protected species such as Otter or Water Vole. Based on current information, it is considered appropriate to revise the River Avon and Tributaries LWS to remove the network of agricultural ditches in Houlton (certainly where these fall outside of wildlife corridors) from the LWS extent.

Retaining the proposed LWS designations, which do not align with any site features, will have significant negative implications for the delivery of the remainder of the Houlton development.

The extant OPP for Houlton, and subsequent Key Phase and RMA approvals, incorporate extensive safeguards to protect and enhance the ecological value of the site, through the creation of an agreed network of wildlife corridors, connecting larger habitat areas such as the A5 Meadows LWS.

The Green Infrastructure Parameter Plan approved under the OPP, included as **Plan 06** in Appendix A, identifies the correct boundaries for the Hillmorton Canal Meadows LWS and A5 Meadows LWS.

Sustainability

Emerging policy EN5 (Canopy Cover) seeks to secure 20% canopy cover for new developments outside the town centre. This policy is supported.

Emerging policy CL1 (Net Zero Buildings) seeks to secure defined energy efficiency targets in operation for all new buildings. While we support this policy's ambitions in principle, we do not consider that its defined targets are altogether achievable for the following reasons:

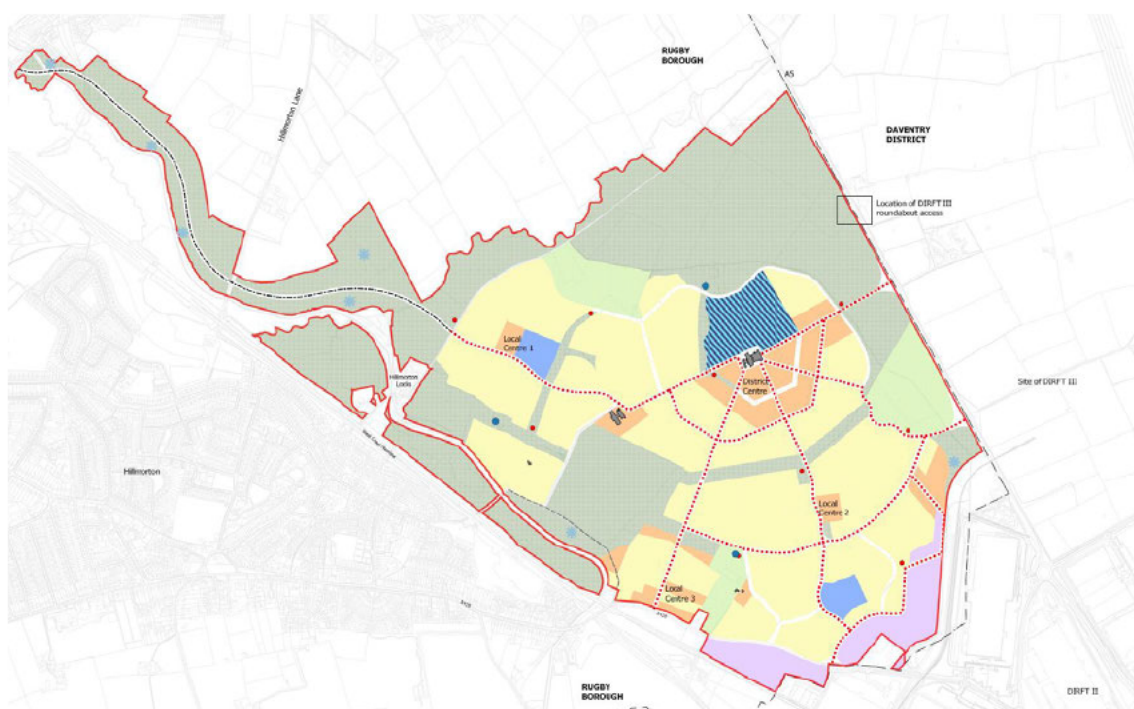
- Clause A (iv) – 120kWh per square metre of building footprint per year may not be an achievable standard for all types of non-residential uses, since the energy demands of a warehouse differ from those of a community building (for example). The energy demands would also be dependent on the available roof space for PV. Therefore, the clause should be amended to add “unless suitable justification can be provided for alternative rates of energy generation”
- Clause B – the heating demand and EUI figures seem to be aligned with the 2050 targets under the Net Zero Carbon Building Standard. While we appreciate the Local Plan is considering a longer term view, our experience is that the 2050 targets are too challenging to meet at this moment in time and therefore the policy should be more realistically aligned with the 2030 targets (with opportunities to meet 2050 targets taken where appropriate by developers).
- Clause C (ii) – a maximum of 35 kWh/m²/yr for warehouses and light industrial uses is too low based on our experience/targets, and therefore should be raised to a more realistic figure.
- Supporting Text 2.3.2, 2.3.3 and 2.4 – the proposed Energy Statement reporting requirements would be difficult to complete for residential buildings, and would be fairly onerous for non-residential uses (and potentially inconsistent between different uses). In both cases, the iterative reporting would create an unnecessary delay to construction and occupation, and therefore we suggest this provision is not carried forward into the draft Local Plan.

Policies Map

In addition to those misaligned boundaries highlighted above, we wish to address two further inconsistencies in the Policies Map with regards to Open Space and Settlement Boundary. If it would be helpful to review these together, we are more than happy to arrange a meeting (in-person or virtual) to explain our rationale further.

The Open Space layer seemingly covers some of those formal and informal open space areas of Houlton which are publicly-accessible and serve a leisure/amenity purpose. However, this data is incorrect and does not correlate with the exact boundaries of areas of open space provided. **Plan 05** of Appendix A identifies those areas that have been implemented on-site with which the Policies Map should align.

The Settlement Boundary is seemingly drawn to align to a degree with those areas identified for residential use under the OPP, but its extent does not appear to follow site attributes or the extent of the OPP site shown on the approved Development Framework Plan (DFP) (extract below). For the avoidance of doubt and for consistency, we strongly urge that the Settlement Boundary is extended to cover Houlton's approved OPP site, as shown on **Plan 01** of Appendix A.



This Submission

This letter accompanies and should be read alongside the following plans in **Appendix A**:

| # | Policies Map Layer | Plan Reference | Format |
|-----------|--------------------------------|------------------|-----------|
| 01 | OPP Development Framework Plan | RRS028-DFP-002-C | PDF + DWG |
| 02 | Residential Allocation | RRS007-166 | PDF + DWG |
| 03 | District Centre | RRS055-007 | PDF + DWG |
| 04 | Local Centre | RRS007-168 | PDF + DWG |

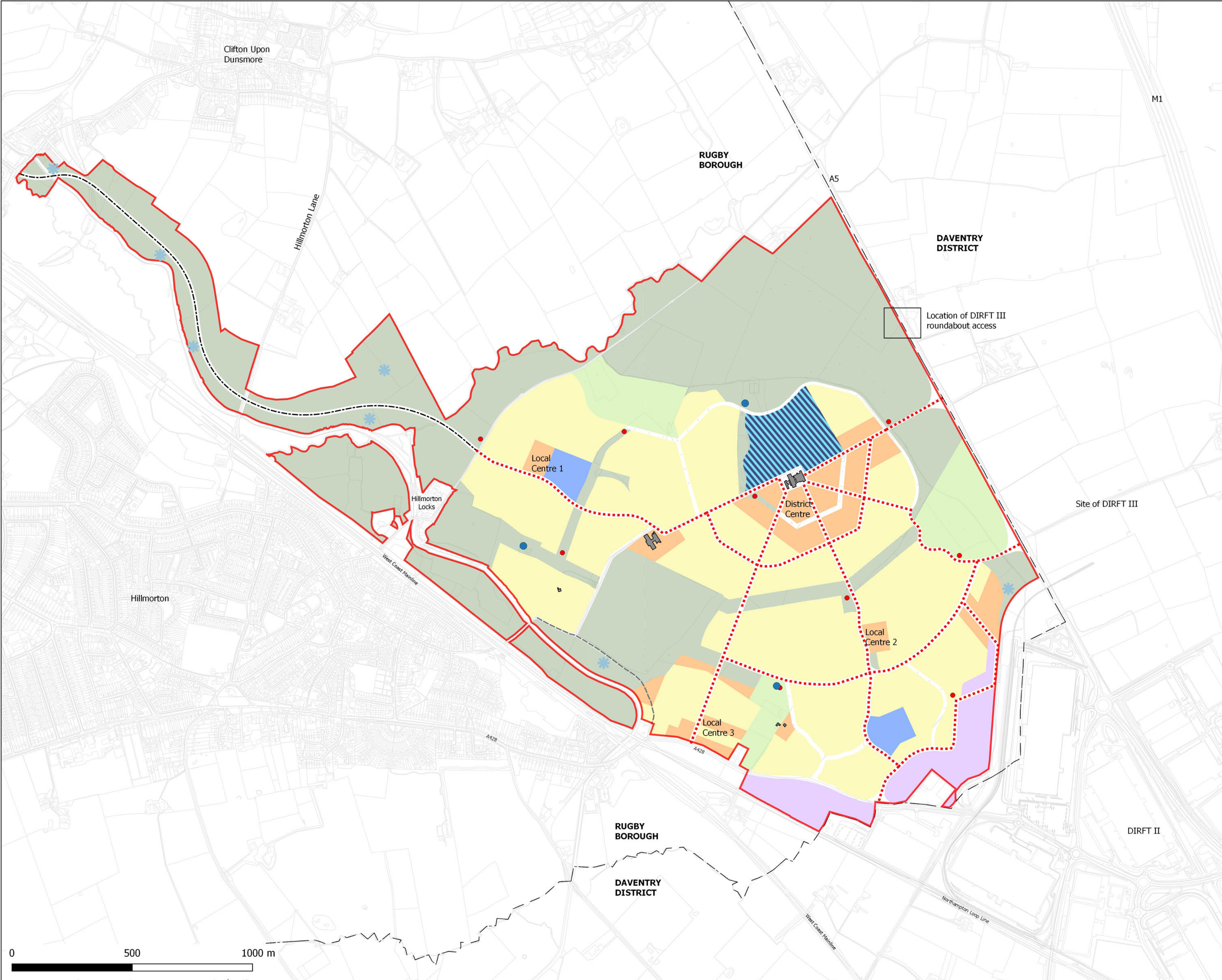
| # | Policies Map Layer | Plan Reference | Format |
|----|----------------------|----------------|-----------|
| 05 | Open Space | RRS007-169 | PDF + DWG |
| 06 | Local Wildlife Sites | RRS028-DFP-004 | PDF + DWG |

We trust the above is helpful to inform the drafting of the Regulation 19 Draft Local Plan, and would welcome opportunities for further engagement with yourselves as required to progress the housing allocation of the Land to the south of Crick Road. In the meantime, should you require any further information, please do not hesitate to contact me or my colleague Helen Armes [REDACTED]

Yours faithfully,

[REDACTED]
[REDACTED]

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



Key

Administrative Boundary

Radio Station Rugby

Sustainable Urban

Extension Outline

Planning Application

Boundary

Residential

Employment

Mixed Use

Primary & Secondary

School Site

Primary School Site

Formal Open Space

Informal Open Space

Existing Building

to be retained

Indicative Location of LEAP

Indicative Location of NEAP

Link Road beyond

built development area

Primary Street

Indicative Drainage Attenuation

Feature

Existing Road to be Subject

of Access Restrictions

This plan now supersedes RRS007-DFP-001

Rev J and its preceding revisions

Revision List

| Revision | Details | Rev Date |
|----------|--|----------|
| A | Link Road Realignment & Change to Mixed Use Parcel | 26/09/16 |
| B | Confirmation of Link Road Alignment | 26/09/16 |
| C | Adjust Mixed Use Parcels Site Wide | 24/11/16 |

Note:

This drawing is for information purposes only and not for use in construction.

Do NOT scale from this drawing.

All Dimensions are to be checked on site and any discrepancies should be immediately reported to the originator of the drawing.

All Information is copyright protected and may not be used or reproduced without prior permission.

RadioStation

Rugby

Radio Station Rugby

Parameter Plan

Development Framework Plan

Date

17/11/2016

Scale

1:10,000 @ A2

Drawn

EW

Designed

EW

Approved

HA

Drawing Number

RRS028-DFF-002

Revision

C

© Crown copyright and database right 2013

Ordnance Survey Licence number 100022533

David Lock Associates

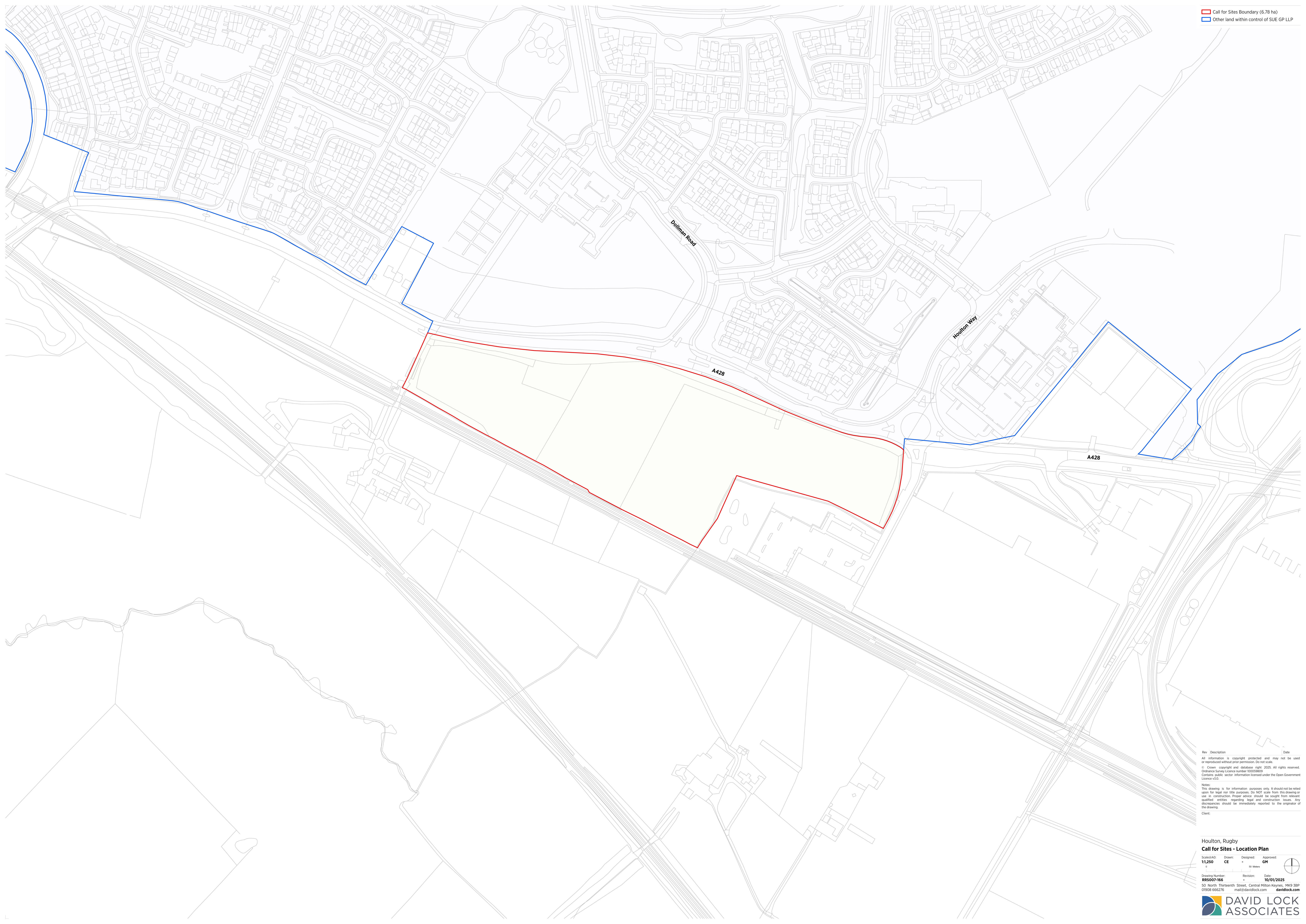
Town Planning and Urban Design

DAVID LOCK ASSOCIATES

50 NORTH THIRTEENTH STREET, CENTRAL MILTON KEYNES, MK9 3BP

TEL: 01908 666276 FAX: 01908 605747 EMAIL: mail@davidlock.com

www.davidlock.com

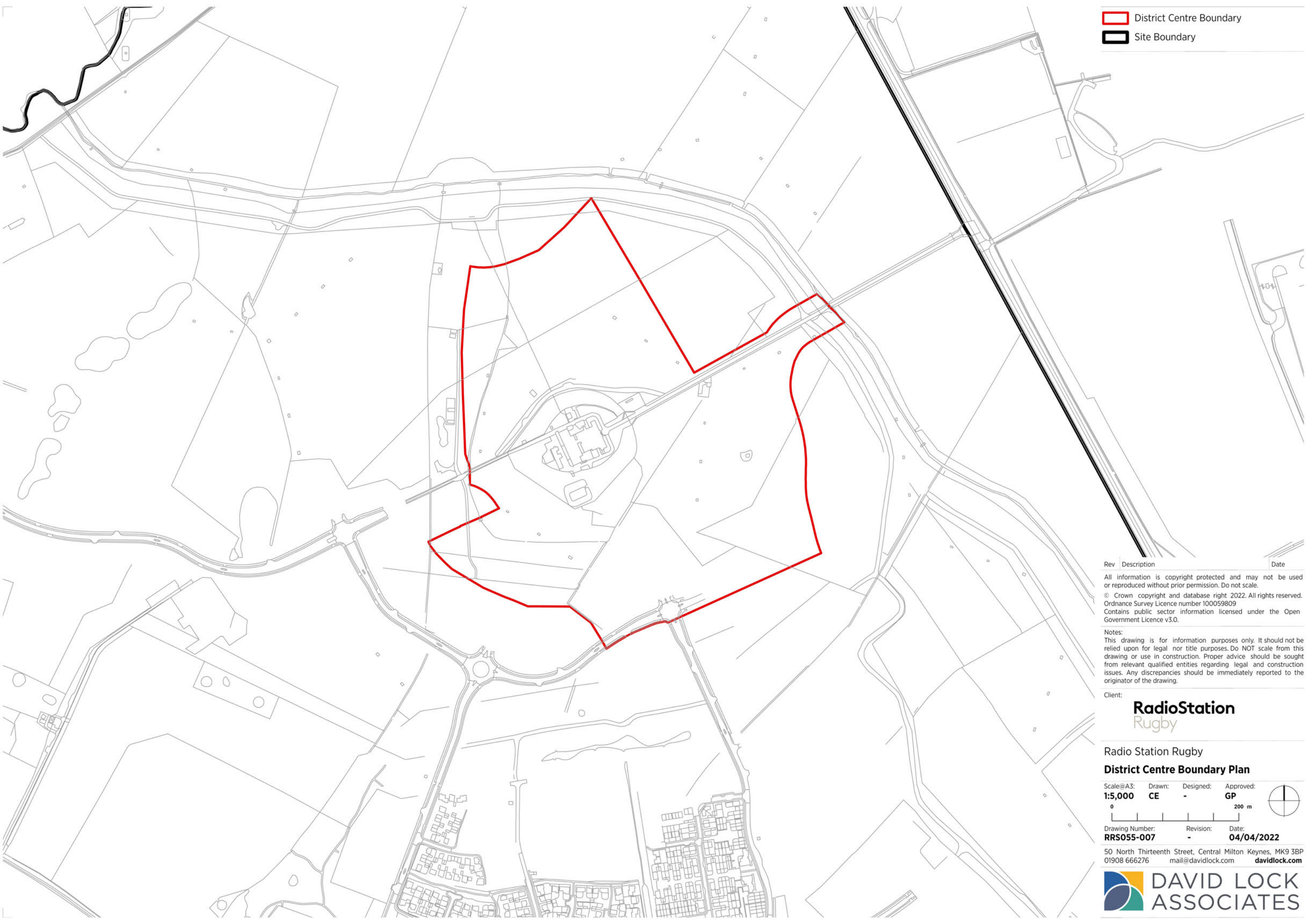


Call for Sites Boundary (6.78 ha)
Other land within control of SUE GP LLP

Rev Description Date
All information is copyright protected and may not be used or reproduced without prior permission. Do not scale.
© Crown copyright and database right 2025. All rights reserved.
Ordnance Survey Licence number 100059809
Contains public sector information licensed under the Open Government Licence v3.0.
Notes:
This drawing is for information purposes only. It should not be relied upon for legal nor title purposes. Do NOT scale from this drawing or use in construction. Proper advice should be sought from relevant qualified entities regarding legal and construction issues. Any discrepancies should be immediately reported to the originator of the drawing.
Client:

Houlton, Rugby
Call for Sites - Location Plan
Scale: A2: 1:1,250
Drawn: CE
Designed: 50 Meters
Approved: GM
Revision: 10/01/2025
Drawing Number: RR5007-166
50 North Thirteenth Street, Central Milton Keynes, MK9 3BP
01908 666276 mail@davidlock.com davidlock.com





- District Centre Boundary
- Site Boundary

| Rev | Description | Date |
|-----|-------------|------|
|-----|-------------|------|

All information is copyright protected and may not be used or reproduced without prior permission. Do not scale.
© Crown copyright and database right 2022. All rights reserved.
Ordnance Survey Licence number 100059809
Contains public sector information licensed under the Open Government Licence v3.0.

Notes:
This drawing is for information purposes only. It should not be relied upon for legal nor title purposes. Do NOT scale from this drawing or use in construction. Proper advice should be sought from relevant qualified entities regarding legal and construction issues. Any discrepancies should be immediately reported to the originator of the drawing.

Client:

RadioStation

Rugby

Radio Station Rugby

District Centre Boundary Plan

| | | | | |
|-----------|--------|-----------|-----------|--|
| Scale@A3: | Drawn: | Designed: | Approved: | |
| 1:5,000 | CE | - | GP | |
| 0 | | | 200 m | |

| | | |
|-----------------|-----------|------------|
| Drawing Number: | Revision: | Date: |
| RRS055-007 | - | 04/04/2022 |

50 North Thirteenth Street, Central Milton Keynes, MK9 3BP
01908 666276 mail@davidlock.com davidlock.com



- Local Centre Boundary
- OPA Boundary
- Approved Applications
- Green Infrastructure
- Grey Infrastructure

Rev Description Date

All information is copyright protected and may not be used or reproduced without prior permission. Do not scale.

© Crown copyright and database right 2025. All rights reserved. Ordnance Survey Licence number 100059809

Contains public sector information licensed under the Open Government Licence v3.0.

Notes:

This drawing is for information purposes only. It should not be relied upon for legal nor title purposes. Do NOT scale from this drawing or use in construction. Proper advice should be sought from relevant qualified entities regarding legal and construction issues. Any discrepancies should be immediately reported to the originator of the drawing.

Client:

Houlton Local Centre

Site Boundary Plan

Scale@A2: 1:1,000

Drawn: CE

Designed: -

Approved: AM

Drawing Number: RRS007-168

Revision: -

Date: 15/05/2025

50 North Thirteenth Street, Central Milton Keynes, MK9 3BP

01908 666276 mail@davidlock.com davidlock.com



OPA Boundary
Implemented Open Space

| Rev | Description | Date |
|-----|-------------|------|
|-----|-------------|------|

All information is copyright protected and may not be used or reproduced without prior permission. Do not scale.
© Crown copyright and database right 2025. All rights reserved.
Ordnance Survey Licence number 100059809
Contains public sector information licensed under the Open Government Licence v3.0.

Notes:
This drawing is for information purposes only. It should not be relied upon for legal nor title purposes. Do NOT scale from this drawing or use in construction. Proper advice should be sought from relevant qualified entities regarding legal and construction issues. Any discrepancies should be immediately reported to the originator of the drawing.

Client:

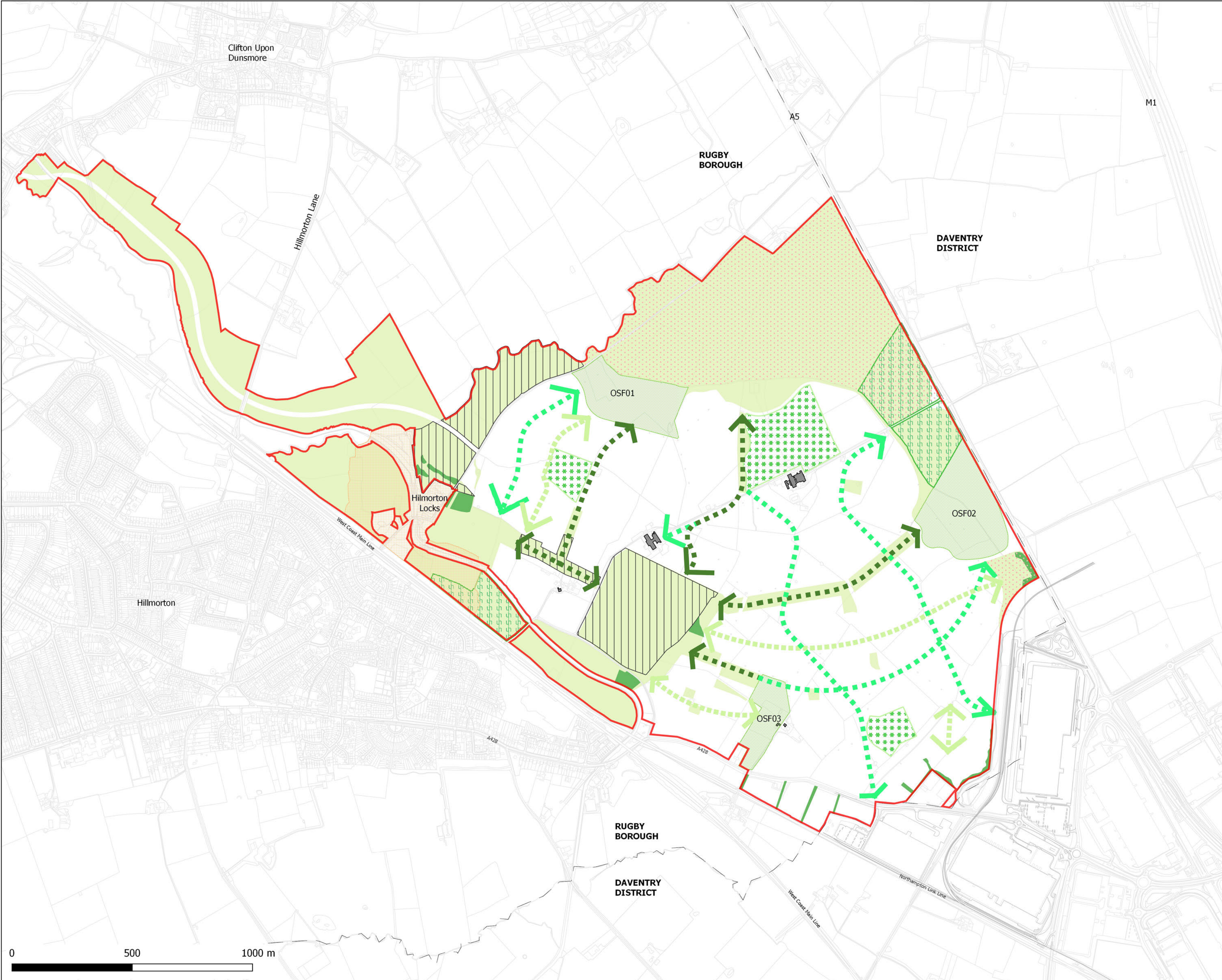
Houlton Implemented Open Space Plan

Scale@A2: 1:10,000
Drawn: CE
Designed: -
Approved: AM

Drawing Number: RRS007-169
Revision: -
Date: 16/05/2025

50 North Thirteenth Street, Central Milton Keynes, MK9 3BP
01908 666276 mail@davidlock.com davidlock.com





- Key**
- Administrative Boundary
 - Radio Station Rugby Sustainable Urban Extension Outline
 - Planning Application Boundary
 - Conservation Area
 - Retained & Enhanced Grassland
 - Local Wildlife Site
 - Proposed Woodland
 - Formal Open Space
 - Informal Open Space
 - School Sites (Including School Buildings)
 - Retained Ridge & Furrow
 - 20m Wildlife Corridors
 - 60m Wildlife Corridors
 - Green Corridors
 - Existing Buildings

Where wildlife corridors intersect vehicular routes appropriate amphibian tunnels/crossings will be provided

Revision List

| Revision | Details | Rev Date |
|----------|---------|----------|
| | | |

Note:
This drawing is for information purposes only and not for use in construction.
Do NOT scale from this drawing.
All Dimensions are to be checked on site and any discrepancies should be immediately reported to the originator of the drawing.
All Information is copyright protected and may not be used or reproduced without prior permission.

RadioStation Rugby

Radio Station Rugby

| | | | |
|---|--|--|--|
| Parameter Plan Green Infrastructure | | | |
|---|--|--|--|

| | | | |
|----------------------------------|----------------|------------------------|----------|
| Date 22/11/2016 | | Scale 1:10,000 @ A2 | |
| Drawn EW | Designed EW | Approved HA | Revision |
| Drawing Number RRS028-DFF-004 | | | |

© Crown copyright and database right 2013
Ordnance Survey Licence number 100022533

David Lock Associates
Town Planning and Urban Design

DAVID LOCK ASSOCIATES
50 NORTH THIRTEENTH STREET, CENTRAL MILTON KEYNES, MK9 3BP
TEL: 01908 666276 FAX: 01908 605747 EMAIL: mail@davidlock.com
www.davidlock.com

