

Preferred Option Consultation,
Development Strategy Team,
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Rugby,
CV21 2RR

Sent by email only to: localplan@rugby.gov.uk

19 May 2025

Ref: Preferred Option Consultation

Dear Development Strategy Team,

Further to the consultation on the Rugby Borough Council Local Plan Preferred Option Consultation Document, please find the enclosed representations relating to Land to the North of the M6, Rugby.



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1. Introduction

1.1 Rugby Local Plan Review Preferred Options Consultation

- 1.1.1 The following representations are made in response to the Rugby Local Plan Review (RLPR) Regulation 19 Preferred Options Consultation document (March 2025) by Catesby Estates, in respect of our land interest at Land to the North of the M6, Rugby (The “Site” – see site location Plan at Appendix 1).
- 1.1.2 The Site has previously been submitted to the Local Plan making process for consideration as a strategic site by L&Q Estates. In August 2024, Urban&Civic plc acquired L&Q Estates from London & Quadrant Housing Trust (L&Q HT). Following this acquisition, the former L&Q Estates portfolio and team has been incorporated within Urban&Civic plc as master developer and Catesby Estates as land promoter.
- 1.1.3 The Site is approximately 217.64ha in size, of strategic scale and located outside of the Green Belt. It is being promoted for a mixed use strategic allocation, with associated community infrastructure. In addition to new homes, schools, local services, active travel routes and green/blue infrastructure, the Site has the potential to include land for strategic employment uses in proximity to Junction 1 of the M6 and the A5 Gibbet Roundabout.
- 1.1.4 The Site has been identified in the Council’s evidence base under Site Reference 132 Land North of M6, Junction 1. The Housing and Economic Land Availability Assessment (HELAA), indicates that the site is not currently developable due to a requirement for a change in policy (i.e. its identification as a Local Plan broad location for growth / allocation). It is otherwise recognised as being available, achievable and potentially suitable. A number of constraints have been identified through the Council’s Stage 2 Site Assessment which have resulted in it not being progressed further. Notwithstanding this conclusion, the identified constraints can be mitigated through the delivery of a planned sustainable urban extension; comprising of housing and employment land; and, supported by levels of new infrastructure, commensurate to the strategic scale of the site. It remains a significant opportunity for the Council to accommodate sustainable growth over the proposed plan period and beyond.
- 1.1.5 These representations have regard to the emphasis in the National Planning Policy Framework (NPPF) on the role of development plans in providing a framework for meeting housing needs and addressing other economic, social and environmental priorities and in supporting the Government’s objective of significantly boosting the supply of homes, through ensuring that a sufficient amount and variety of land can come forward where it is needed. Strategic policies within local plans should be sufficiently long term and look ahead over a minimum 15 year period, with those containing new settlements or significant urban extensions containing policies set within a vision that looks further ahead (at least 30 years).
- 1.1.6 The tests of soundness that development plans need to meet so as to be legally compliant and found sound are set out in Paragraph 36 of the National Planning Policy Framework (NPPF) (December 2024):

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.1.7 The representations are submitted via email to localplan@rugby.gov.uk.

1.2 Background

1.2.1 The current Rugby Local Plan 2011-2031 was adopted in June 2019 and national policy requires local plans to be reviewed every five years to determine whether policies have become out-of-date and require updating. It is noted that a decision was taken in December 2022 to undertake a full update of the local plan and that the Local Plan Review Issues and Options Consultation and Call for Sites provides the first opportunity for interested parties to comment on the process.

1.2.2 This submission promotes the Land to the North of M6 Junction 1 as a location for the strategic growth of Rugby over the period to 2045 and beyond. Catesby Estates would welcome the opportunity to discuss the site with the Council as it makes further progress with its Local Plan Review and to actively engage in the on-going local plan making process.

2. Representations to the Preferred Option Consultation

2.1 Objectives & Key Diagram

2.1.1 The Preferred Options document identifies the following six objectives:

- Support the diversification and growth in sustainable locations of Rugby Borough's economy in line with the Economic Strategy
- Support the revival of Rugby town centre
- Reduce emissions and adapt to climate change
- Raise design standards
- Deliver infrastructure-led growth
- Facilitate a greener, more biodiverse borough and deliver new country parks

2.1.2 The emphasis of these objectives is broadly supported. It should however be noted that the identification of further strategic locations for growth has the potential to make a strong contribution towards the Council's ability to meet these objectives. Land north of the M6 has the potential to form part of an ambitious growth strategy for the area, set in a vision that looks ahead at least 30 years to truly achieve the objectives that have been identified. It is essential that the version of the Local Plan that is published under Regulation 19 in due course, includes a Vision that demonstrates how long term requirements and opportunities will be truly embraced in Rugby Borough; an area with substantial potential for sustainable economic growth.

2.1.3 The Key Diagram demonstrates how well connected the land to the North of the M6 at Rugby is within the wider strategic context. This location provides a significant opportunity for plan led strategic growth over the plan period and beyond. It should therefore be considered for inclusion in the Plan's Vision and Strategy and be identified as a broad location for development on the Key Diagram.

2.1.4 The Local Plan needs to support the long term goals of the Council's Economic Strategy by setting an ambitious course for sustainable growth, taking full advantage of the area's locational advantages. It can support wider than local economic development. An ambitious growth strategy should be embedded into the Plan's Objectives and Vision.

2.2 Strategy

S1 Settlement hierarchy

2.2.1 Catesby Estates welcomes the identification of a settlement hierarchy and the indication that new development will be commensurate with the services and facilities of the settlement in which it is located. The Rugby Urban area is the main focus for new homes and employment over the plan period and this is supported. Opportunities to expand the Urban Area over the plan period and beyond should however be further explored. Land to the North of the M6 has significant potential to strengthen the

Borough's economy and create a sustainable new community in proximity to the area's most sustainable existing settlement. Locations for further strategic growth in proximity to Rugby, such as the land to the north of Junction 1 of the M6, provide the potential to create a strategy for growth that continues to be centred on sustainable links to the Town to support its continued regeneration, whilst delivering ambitious levels of economic growth in a non-Green Belt location.

S2 Strategy for homes

- 2.2.2 The Plan seeks to make provision for 12,978 new homes over the plan period 2024-2045. This aligns with the baseline requirement of Paragraph 62 of the NPPF, which states that local housing need should be calculated using the Standard Method set out in National Planning Practice Guidance (NPPG). Following the publication of the updated NPPF in December 2024, the Standard Method identifies a need for 618 dwellings per annum in Rugby Borough. Notwithstanding this, the policy should express any requirement figure as a minimum, rather than a maximum. Furthermore, the Council's evidence should consider whether additional levels of growth should be planned for over the plan period, in recognition that national policy sets the standard method as a starting point.
- 2.2.3 The Housing and Economic Development Needs Assessment (November 2022) suggests that on a trend based scenario, 735 dwellings per annum could be required in Rugby, and Table 4.1 of that document identifies that the Council has an annual net affordable housing need of 407 dpa.
- 2.2.4 Paragraph 2A-024 of the PPG states that higher housing figures may be needed where this could help deliver the required number of affordable homes. Therefore, the evidence base already highlights how a greater number of dwellings than 618 per annum is likely to be required and can be accommodated on available land.
- 2.2.5 Moreover, the housing requirement figures do not factor in any unmet need from neighbouring authorities which may have to be accommodated in Rugby under the duty to cooperate (NPPF Paragraph 24) to ensure that the Plan is positively prepared. Paragraph 62 of the NPPF is clear that needs which cannot be met within neighbouring areas should be taken into account in establishing the number of homes to plan for. Whilst Coventry appears to be able to plan to meet all of its housing need, the Greater Birmingham and the Black Country Housing Market Area has identified significant shortfalls: the emerging policy must not treat the 618 dpa figure as a maximum figure for housing delivery in Rugby to 2045.
- 2.2.6 For the Plan to be found sound, it will need to be effective, meaning that it must be deliverable over the plan period. It is thus necessary to establish whether 618dpa is achievable in Rugby. The evidence on past delivery suggests that this is the case. The Council's 5YHLS Position 2024-2029 identifies that against a housing target of 663 dwellings per annum, the Council has exceeded that for the last 6 years since 2018, delivering 1,193 dwelling in excess of the housing targets from the start of the Plan period in 2011 up until 2023-2024. This suggests that the Council could, in fact, plan for more housing, which will help to meet the affordable housing need within Rugby.

2.2.7 **S3 Strategy for employment land**

2.2.8 There remains a wider than local need for industrial land to accommodate the premises required by a range of business types over the plan period to 2045 and beyond. The strategy for employment land should be vision led over at least 30 years and seek to identify opportunities that fully reflect the locational advantage of Rugby Borough, supporting the delivery of the Council’s ambitious Economic Strategy. Land to the North of M6 Junction 1 is a key location, which provides the opportunity to support the delivery of a long-term pipeline of land for B2, B8 and classes E(g)(ii) and (iii). The delivery of a mixed-use strategic development, would also enable the integration a range of employment spaces to meet modern needs and demands alongside a sustainably planned housing development.

2.2.9 **S6 Residential Allocations**

2.2.10 This draft policy identifies a range of small and medium sized sites, in addition to the strategic sites that were identified through the adopted Local Plan. This approach misses the opportunity to make a further step change and set a truly ambitious commitment to developing the local and regional economy over the period 2024 – 2045. Further consideration should be given to the identification of a further broad location for growth at land North of M6 Junction 1, to ensure that an ambitious approach is taken to the delivery of sustainable employment and housing growth that is set in a vision for Rugby Borough over a 30 year timeframe.

2.2.11 **S7 Employment allocations**

2.2.12 As set out in response to S3 above, the Council’s approach to the allocation of land for employment uses should be vision led and ambitious. A broad location for growth at Land North of M6 Junction 1 has the ability to meet the criteria for strategic sites that is set out in The West Midlands Strategic Employment Sites Study 2024 (WMSESS)

- Good connections with the strategic highway network (for road)
- Sufficiently large and flexible - ideally sites would be a minimum of 25ha and readily over 50ha
- Is or can be served from an electricity supply grid with sufficient capacity.
- Is accessible to labour and includes a clear sustainable transport solution for the local road network.
- Is located away from incompatible land-uses
- The ability to deliver high-bay warehousing

2.2.13 Furthermore, the scale of the site being promoted by Catesby Estates would allow the integration of land to accommodate modern workspaces and smaller scale employment land, set within a wider sustainable location for growth, alongside new homes and significant wider infrastructure investment.

3. Land to the North of M6 Junction 1, Rugby

3.1 Site Description

3.1.1 The land to the North of M6 Junction 1 (the “Site”) comprises approximately 217.64ha of land located to the north of the urban area of Rugby. The site consists of a series of predominately open, arable fields with a network of hedgerows, some pockets of woodland and some water bodies. The A426 bisects the site in a roughly north-south direction linking the M6 with the A5. It has been considered through the Council’s Housing and Economic Land Availability Assessment (HELAA) and Site Assessment under Site Reference 132: Land North of the M1 J1.

3.1.2 The following are appended to this document:

- Appendix A: Site Location Plan
- Appendix B: Site Opportunities and Constraints Plan

3.1.3 The Site is in single ownership and is available, achievable and suitable to accommodate strategic residential and employment development over the plan period and beyond. There is no over-riding constraint on the land which cannot be either resolved through design or adequately mitigated. The site is located outside of the Green Belt and is suitably located to support the delivery of a sustainable direction for growth for Rugby that integrates housing, employment and community infrastructure, embedding sustainability principles.

3.1.4 The site has been discounted through the Council’s Stage 2 Site Assessment. This has identified a number of the constraints and opportunities associated with the site. The following table provides our comments on the Council’s Evaluation Summary:

Topic Area	Notes on Evaluation
Transport	It is noted that initial consideration from National Highways has identified that development in this area could have a high impact on the strategic road network. However, the location adjacent to M6 J1 provides the opportunity to support strategic employment growth and support a scale of development that can ensure that mitigation can be provided to address impacts on the strategic road network. Furthermore, the provision of community infrastructure and employment opportunities at the site would support the containment of journeys and enable investment in public transport and active travel routes.
Ecology	The Stage 2 Assessment concludes that the site has medium ecological constraints. However, appropriate mitigation can be provided to ensure that

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	there are no adverse effects in this regard.
Landscape	The Stage 2 Assessment indicates that the landscape sensitivity of the Site is Medium/Low. There is an opportunity for a strategic development to be brought forward that respects its wider landscape setting. In addition, the recreational value of the area can be enhanced through the provision of large areas of new accessible public open space.
Heritage	The Site Assessment identifies the historic settlement of Churchover and its Conservation Area. It also highlights a Scheduled Ancient Monument (bowl barrow), which is located beyond the southern boundary of the Site. These locations would form key considerations in the masterplanning of the Site and any impacts can be mitigated through a strategy that respects local historic landscape features and the setting of heritage assets.
Other Constraints	The Site Assessment recognises that the Site is outside of the Green Belt. Foul water and surface water drainage can be accommodated alongside the development of the Site. Any loss of BMV land would form a consideration alongside the wider economic, social and environmental benefits of a sustainable urban extension in this location.
Opportunities / Benefits	The Site Assessment identifies the Site's potential to accommodate a sustainable urban extension. The location adjacent to M6 J1 provides a significant opportunity to deliver much needed economic growth alongside a sustainable new community.

3.1.5 The outcome of the Stage 2 Assessment is that the Site has not been progressed to further consideration through the Sustainability Appraisal. Notwithstanding this, the site remains suitable, available and achievable; it has strong potential to accommodate the development needed to support ambitious levels of sustainable economic growth over the plan period and beyond; and is capable of being identified as a broad location for growth. There are no constraints identified that cannot be mitigated through a sensitive design led development. The Site has the potential to

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provide significant economic, environmental and social benefits over the plan period and beyond.

- 3.1.6 The Site can be successfully developed, taking into account all the relevant constraints, to deliver in the order of 100ha of net developable land. The Site will be the subject of a high level masterplanning exercise to set a high quality design vision. It has the potential to secure a development of approximately 3500 dwellings, or alternatively, a mixed-use masterplan that can provide new homes and strategic employment land in proximity to Junction 1 of the M6 and the A5 Gibbet Roundabout. It is considered that the inclusion of an element of employment land in this location has strong potential to support the delivery of an established strategic requirement.
- 3.1.7 Topographically, the site rises from the River Swift, which runs along its western boundary. There are no specific landscape designations and it is well contained to the north, east and south given the backdrop of urban form. The landscape is more open to the west. The majority of the site is within flood zone 1, with an area of land adjacent to the River Swift within flood zones 2 and 3. A sustainable urban drainage scheme will therefore be developed for the Site.
- 3.1.8 Taking the above into account, the west of the Site provides the opportunity for the creation of open space at the scale of a new Country Park. This can support the delivery of biodiversity net gain and form a significant recreational resource for the local community. The inclusion of open space at a strategic scale provides the opportunity to explore the creation of a legacy company to secure long-term sustainability, quality and longevity. Existing public rights of way can be integrated within new green infrastructure and create the opportunity to link into existing publicly accessible green infrastructure to the south of the M6. The delivery of a significant area of open space to the west of the site would also act as an area for biodiversity whilst providing an area of separation and resource for Churchover, where there is a conservation area and a number of listed buildings.
- 3.1.9 Coton House Estate is located to the south of the Site. There are listed buildings and a Scheduled Ancient Monuments in this area, which would be carefully considered through masterplanning and at the detailed design stage.
- 3.1.10 In conclusion, the site can offer a number of key opportunities:
- A large area of land adjacent to Rugby's urban area that is in single ownership that is available for development and outside of the Green Belt
 - An area for strategic scale, sustainable housing and employment growth to the north of Rugby town, embedding high quality design principles to sustainably deliver against established needs
 - The opportunity to create a high-quality design led scheme with longevity secured through a legacy led approach
 - Strategic employment land with key and quick access to the highway and motorway network
 - A new district centre, including shops, schools and community facilities at the heart of the development

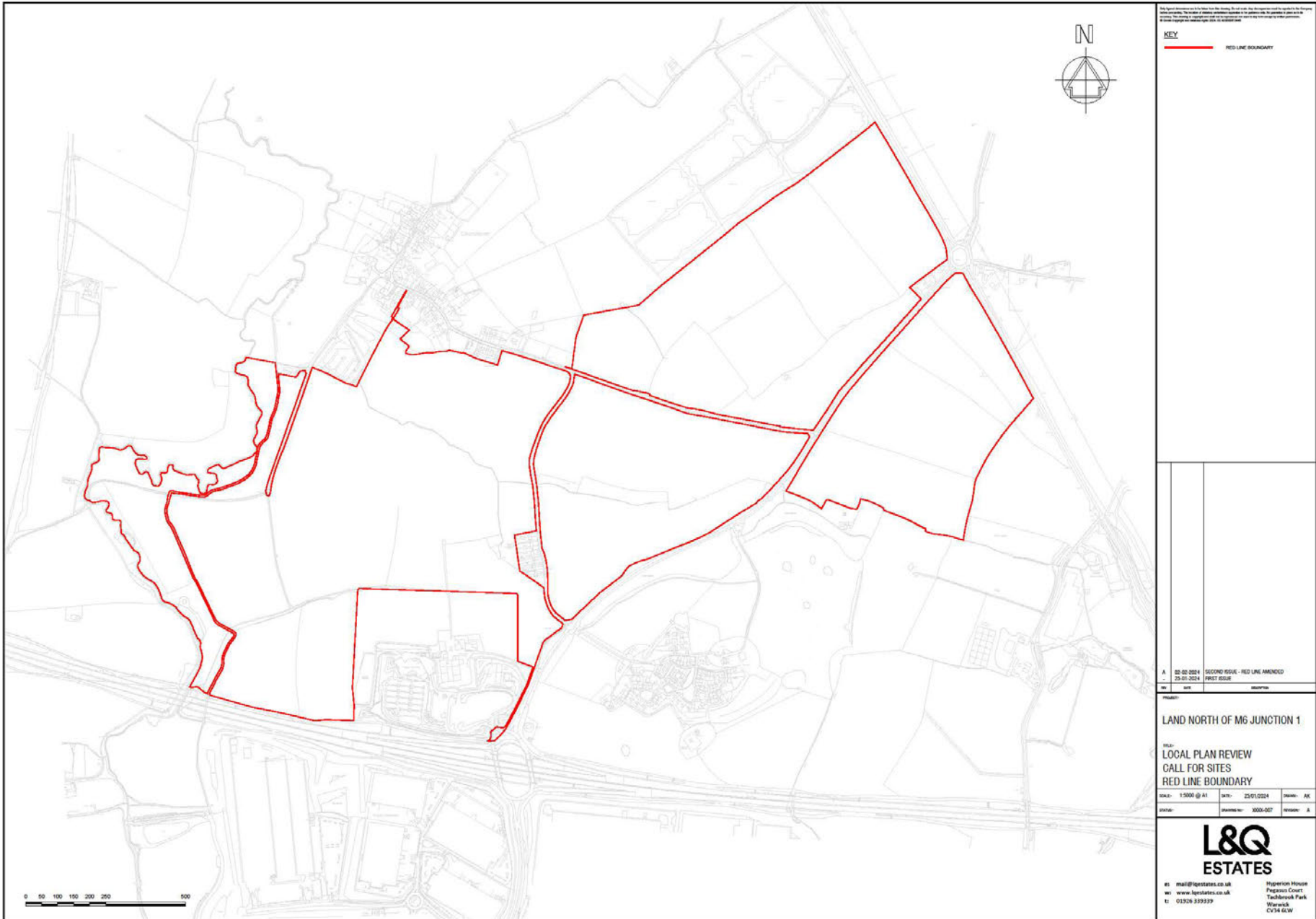
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- An upgraded and extended Green/Blue Infrastructure network along with the provision of communal cycle facilities to provide enhanced pedestrian/cycle links within the site and towards Rugby town.
- The creation of substantial areas of naturalistic public parkland affording long distance views and supporting improvements to biodiversity and tree planting.
- Open space will be retained and significantly improved to protect the settings of Churchover and Coton House Estate and provide a resource for both existing and new residents.

3.1.11 Catesby Estates would value the opportunity to engage with Council as progress is made with the masterplanning of the Site and welcomes the opportunity to submit representations at the Preferred Option Stage of the Rugby Local Plan Review.

Appendix 1 – Site Location Plan

Site Location Plan – Land to the North of M6 Junction 1, Rugby



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KEY
— RED LINE BOUNDARY

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Appendix 2 - Site Opportunities and Constraints Plan

