

RUGBY BOROUGH LOCAL PLAN (2024 – 2042)



REPRESENTATIONS

PROPOSED SUBMISSION VERSION

February 2026

Project Name: Rugby Borough Local Plan – Regulation 19

Client Name: Allesley Investments Limited and Boveton Estates Limited

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Date: 23rd February 2026

Reviewer AG/DP

Signed xxx

Date: 23rd February 2026

Revision: 1

Executive Summary

These representations have been prepared on behalf of Allesley Investments Limited and Boveton Estates Limited (“Allesley and Boveton”) in respect of the Rugby Borough Local Plan (“RBLP”). They raise significant concerns regarding the soundness and legal compliance of the Plan as currently drafted. However, we consider that these matters are capable of remedy. A principal means of doing so would be the identification of additional sustainable growth locations—most notably North West Rugby, which consistently performs well in the evidence base and represents a credible Strategic Urban Extension (SUE) capable of meeting Rugby’s identified needs.

- The Plan proposes to meet housing needs solely at the level of Local Housing Need (LHN), equating to 10,812 dwellings. This represents the minimum required by national policy and is materially below what historic delivery, demographic projections, affordable housing requirements and economic growth considerations indicate is needed. On every indicator—evidence points towards the requirement for substantially higher provision than LHN alone.
- The proposed plan period to 2042 also gives rise to soundness risks. With adoption expected in 2027, the Plan would not provide the minimum 15-year horizon required by paragraph 22 of the NPPF. Extending the period to 2045, as previously proposed, is therefore necessary.
- The Sustainability Appraisal (SA) fails to test reasonable alternatives to the housing requirement and appears to justify the Council’s selected strategy rather than objectively compare options. This includes an inconsistent and inadequately reasoned treatment of SUEs. For example, the SA acknowledges that a SUE at North West Rugby could deliver major infrastructure, flood mitigation and 20% affordable housing, but does not award corresponding positive scores. Meanwhile, small and medium-sized urban sites—which offer limited infrastructure capacity and face acknowledged delivery challenges—receive more favourable scoring. The SA’s treatment of infrastructure, climate resilience, and viability considerations is therefore neither proportionate nor robust.
- The Green Belt Stage 2 Assessment’s conclusions regarding the site’s contribution to Purpose A are similarly flawed. The assessment underplays extensive urbanising influences—including the M6, major industrial estates, and the established settlement of Newbold—and incorrectly describes the western boundary as a “minor road” despite its B-class status and topographical containment. Evidence in the Council’s own Landscape Sensitivity Assessment further confirms the presence of substantial

industrial and infrastructure features shaping the local environment. The conclusion that the site makes a “strong” Green Belt contribution is therefore not well-founded.

- The Plan also applies a supply-side buffer of just 8.5%, significantly below the 17.5% used in the current adopted plan. Given known delivery issues at existing SUEs and the heavy reliance on them to 2042, a materially higher buffer (15–20%) is required to ensure flexibility and resilience.

In light of these concerns, Allesley & Boveton consider that the Plan could be made sound through the following modifications:

- Extending the plan period to 2045.
- Setting a higher housing requirement informed by demographic, economic, and affordable housing needs, and allowing flexibility to meet any unmet need from Coventry.
- Increasing the supply-side buffer to 15–20%.
- Reconsidering the Green Belt Stage 2 assessment for North West Rugby.
- Allocating North West Rugby as a strategic growth location, reflecting its strong performance across sustainability, accessibility, deliverability, and infrastructure criteria.

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1. Introduction

1.1 Background

- 1.1.1 These representations to the Rugby Borough Local Plan (“RBLP”) have been prepared by Marrons on behalf of Allesley Investments Limited and Boveton Estates Limited (“Allesley and Boveton”).
- 1.1.2 These representations are made to ensure the soundness of the RBLP, and we trust officers will find them helpful. These representations are made in the context of Land to the North West of Rugby (“the Site”) (ID Reference 114).
- 1.1.3 Allesley & Boveton have fundamental concerns in respect of the soundness and legal compliance of the Plan as drafted. However, we consider that these concerns can be overcome through the allocation of further land for growth, and consider North West Rugby to be a high-performing candidate in respect of meeting those growth needs.

1.2 Policy Framework

- 1.2.1 The Government’s planning policy framework for England is contained within the National Planning Policy Framework (“NPPF”), December 2024 edition. Paragraph 234 of the latter states that where a Plan has reached Regulation 19 stage on or before 12th March 2025, and its housing requirement meets at least 80% of local housing need calculated using the updated Standard Method, policies in previous versions of the NPPF will apply. In this case, the transitional provisions of the NPPF do not apply and so at the present time, the soundness of the RBLP will be examined against the NPPF 2024.
- 1.2.2 Paragraph 36 of the NPPF sets out that local plans will be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are sound where they are:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and informed by agreement with other authorities, so that unmet need can be accommodated where it is practical to do so and 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 of the Framework and other statements of national planning policy, where relevant.

1.3 Structure of Representations

1.3.1 These representations are structured as follows:

- **Section 2** – Housing requirement and spatial strategy for new homes (Policies S1 and S2)
- **Section 3** – Rugby North West
- **Section 4** – Summary and Conclusions

2. Strategy for Homes and the Settlement Hierarchy (Policies S1 & S2)

2.1 The Housing Requirement

2.1.1 Policy S2 of the RBLP sets out a housing requirement of 10,812 homes over the Plan period 2025 to 2042, equating to an annual average of 636 dwellings per annum (“dpa”). As explained in paragraph 1.20 of the supporting text to Policy S2, published alongside the consultation, the figure of 636 dpa represents the Borough’s local housing need (“LHN”) calculated using the Standard Method. It has been multiplied by the number of years within the Plan period to arrive at the overall housing requirement.

Plan Period

2.1.2 As the Council will be aware, paragraph 22 of the NPPF requires local plans to look a minimum of 15 years forward from adoption. As the RBLP is anticipated for adoption in 2027, a plan period extending to 2042 means that even a minor slippage in timescales for plan preparation or the examination will result in the RBLP extending for fewer years than the minimum suggested by the NPPF from adoption.

2.1.3 We consider the previous 2045 timescale proposed as part of the Draft Plan a pragmatic and forward-looking response to ensuring the RBLP covered the minimum required period. We do not support the current approach **and request that the end year for the RBLP is extended to 2045 as per the previous draft.**

LHN and the Housing Requirement

2.1.4 As explained by the Planning Practice Guidance (“PPG”), local housing need is an unconstrained assessment of the minimum number of homes needed in an area. This is the first step in the process of deciding how many homes need to be planned for. **It is different from establishing a housing requirement figure.¹ The Standard Method does not produce a housing requirement figure.²**

2.1.5 In contrast to the LHN, the housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. The PPG explains that:

“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities **should consider the merits of planning for higher growth**

¹ Paragraph: 001 Reference ID: 2a-001-20241212

² Paragraph: 002 Reference ID: 2a-002-20241212

if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination.”³ [Emphasis Added]

2.1.6 That point is also reiterated at paragraph 49 of the NPPF, which states that the housing requirement may be higher than the LHN if, for example, it includes provision for neighbouring areas, responds to growth ambitions or infrastructure investment. These examples cited within the NPPF are clearly not intended as a “closed list” and accordingly, we expect the evidence base to grapple with the question of whether the housing requirement should be higher than the LHN. On this point, we would make the following observations:

Delivery Trends and Previous Assessments of Need:

2.1.7 The Housing and Economic Development Needs Assessment (“HEDNA”) 2022 estimated a need for 735 dpa for Rugby based upon the demographic projections available at the time. The figure 735 dpa for Rugby is arrived at using a trend-based projection driven by stronger population growth underpinned by changes in migration levels as well as fertility and mortality rates.

2.1.8 We note that the difference between the HEDNA 2022 approach and that espoused in the current draft of the RBLP is addressed in paragraphs 4.14 and 4.15 of the Updated Housing Needs Evidence (September 2025). Essentially, it is explained that the current (December 2024) NPPF provides no scope to use an alternative to the Standard Method. However, Paragraph: 040 Reference ID: 2a-040-20241212 of the Planning Practice Guidance (PPG) states that:

“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth, this should not normally have to be thoroughly justified at examination.”

2.1.9 Therefore, had the RBLP’s housing requirement responded to the demographic projections as assessed in the HEDNA 2022 and been higher as a result, the PPG says that this should not normally have to be “thoroughly justified” at examination. This contradicts the narrative provided within the Updated Housing Needs Evidence and we do not agree that the 2024 NPPF and associated PPG provide any reason to discount a higher housing requirement where previous and recent evidence indicates that need is greater than that indicated by the Standard Method.

³ Paragraph: 040 Reference ID: 2a-040-20241212

2.1.10 In addition, between 2021/22 and 2023/24 housing delivery in Rugby has averaged 1,037 dpa. Having regard to monitoring data reported in the Rugby Borough Council Authority Monitoring Report (2023 – 2024), housing delivery has been consistently and materially more than the LHN since the 2018/2019 monitoring year, averaging 965 dpa since that time.

2.1.11 Over a longer timespan and over that of the current plan period to date (2011 to 2024), the Council saw 690 dwellings per annum completed according to the Updated Housing Needs Evidence (September 2025). Whilst this is an extensive period and does not reflect more recent trends, even then the rate of completions has been significantly higher than the proposed RBLP housing requirement. Five years post adoption of the current local plan, the Updated Housing Needs Evidence (September 2025) reports a far higher average completion rate of 970 dwellings per annum.

2.1.12 Previous assessments of need and delivery trends all point towards housing needs being greater than the LHN.

Economic Growth:

2.1.13 Economic development needs were considered in the HEDNA and more recently within the West Midlands Strategic Employment Sites Study 2024 (“WMSESS”). The WMSESS calculates needs for large-scale employment sites but does not apportion that need to individual local authority areas. Rather, it apportions need to a series of opportunity areas including to Area 7, which largely corresponds to Rugby Borough Council’s administrative area.

2.1.14 That wider strategic need alone generates a requirement of 139.5ha of strategic industrial employment land. When non-strategic needs for industrial land are considered, the calculated need for all industrial land stands at 202ha net of committed supply. This is before any unmet economic development needs from Coventry are considered.

2.1.15 The HEDNA 2022 concluded that there was no case to uplift the housing requirement to support economic growth, except potentially in North Warwickshire. However, this conclusion was made in respect of a lower assessment of employment land needs in Rugby, which did not reflect strategic industrial needs within the wider sub-region.

2.1.16 The WMSESS has subsequently sought to do so. and in line with this, Policy S3 of the emerging RBLP plans for a total of 287 hectares of employment land over the Plan period. Within previous consultations, no part of the evidence base explored whether the overall housing requirement is sufficient to support the level of employment growth planned for, noting that it seeks to respond to wider sub-regional needs as well as the Borough’s own needs. This evidence has now been published in the form of the Homes – Jobs Alignment Paper (December 2025).

- 2.1.17 The Alignment Paper has been commissioned jointly across the Coventry and Warwickshire Housing Market Area (“HMA”) and considers alignment over three periods, but none of these correspond to the Plan period of the RBLP. The Alignment Paper also does not consider the alignment of homes and jobs within Rugby Borough within the context of the RBLP.
- 2.1.18 Whilst we note the point made in several parts in the evidence base that some of the employment land provision in Policy S3 is to meet sub-regional needs rather than the Borough’s own, **there is a clear imperative to align homes and jobs provision to achieve sustainable patterns of growth by ensuring people can live close to where they work.**
- 2.1.19 The Alignment Paper does not demonstrate this has been achieved in the context of the RBLP because it does not calculate the labour force required to support Rugby’s employment provision, nor does it test whether the housing figure in the RBLP can generate such labour supply.
- 2.1.20 In our view and using standard assumptions, Rugby’s planned housing requirement (10,812 homes) is **plainly insufficient to support the workforce needed for Rugby’s employment land provision (287 ha). The Alignment Paper does not demonstrate otherwise.**
- 2.1.21 **Therefore, there is a clear case housing requirement should be increased to accommodate the level of planned employment growth to ensure sustainable patterns of development.**

Affordable Housing:

- 2.1.22 The PPG states:

“The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”⁴

- 2.1.23 The Updated Housing Needs Evidence (September 2025) estimates that Rugby Borough’s affordable housing need is 474 dpa. This represents 74% of the Borough’s LHN (636 dpa). Therefore, it stands to reason that the housing requirement, which is based only upon local housing need calculated the Standard Method, will not come close to meeting the objectively assessed need for affordable homes presented within the housing needs evidence given that the viable level of affordable housing contributions sits at 20-30%.

⁴ Paragraph: 024 Reference ID: 2a-024-20190220

- 2.1.24 The Updated Housing Needs Evidence (September 2025) does provide comment on the above matter. Essentially, it concludes on an HMA-wide basis that the amount of housing required to meet affordable housing needs in full would be unrealistic. It also refers to the technical complexity of making a link between affordable housing needs and the overall housing requirement.
- 2.1.25 We agree that it is often not realistic to meet a local authority’s affordable housing in full and there is no requirement in national policy to do so. However, increasing the overall housing requirement will deliver more affordable homes than would otherwise come forward based on the minimum LHN alone and therefore, to use the PPG’s phrasing, “help to deliver” the required number of affordable homes over the Plan period. Being unable to meet the affordable housing need in full does not mean the matter should be ignored. As set out above, Rugby Borough has seen recent annual completions significantly in excess of the LHN and therefore, the Borough is able to realistically sustain a higher rate of housebuilding than the bare minimum.
- 2.1.26 Whilst making the link between the overall housing requirement and the affordable housing need may be complex, this does not obviate clearly stated national policy on the subject, which requires consideration of uplifting the housing requirement to meet the affordable housing need. This has not been undertaken within the wider evidence base. We would ask that the Council explore the matter further.

Sustainability Appraisal

- 2.1.27 The Sustainability Appraisal (“SA”) of the Rugby Borough Local Plan (December 2025) by AECOM, in essence, states that there is no reason to set the housing requirement higher than the minimum required by the LHN.
- 2.1.28 This statement is somewhat surprising given the statement at paragraph 5.2.29 of the Regulation 18, Preferred options SA which stated that “**...there is a clear high-level case for remaining open to the possibility of higher growth scenarios, subject to consideration of supply options below. This high-level case primarily relates to affordable housing need.**”
- 2.1.29 The Regulation 19 SA also acknowledges (at paragraph 5.2.8) there is the issue of potential unmet housing need from Coventry that is still unresolved.
- 2.1.30 Coventry City Council, it is noted, is currently anticipating meeting its own needs to 2041. However, this will need to be kept under review given that Coventry’s capacity to deliver the amount and rate of housing growth necessary to meet those needs will be subject to examination by the Secretary of State. In addition, Coventry’s emerging local plan only runs to 2041 and given that Rugby’s Local Plan looks ahead to 2042, it is unclear whether Coventry will be able to meet its own housing needs over that timescale. Given the uncertainty, it would be sensible for Rugby

Borough Council’s emerging local plan to include a contingency to address Coventry’s unmet need should it arise in the Plan period to 2042.

2.1.31 Despite SA’s position in respect of the housing requirement, it does consider “higher growth” scenarios but does so in the context of the overall supply rather than the housing requirement itself. The housing requirement is distinct from the supply to meet it, and it is apparent to us that the SA has not considered any alternative housing requirement apart from the proposed housing requirement, which is informed by the minimum LHN figure.

2.1.32 In our view, the judgements about reasonable alternatives to the housing requirement should be informed by the appropriate evidence to conceptualise and explain the options considered. For example, the evidence could consider the number of homes required to support a high economic growth scenario, to address part of Coventry’s unmet need should that arise or to bring forward more affordable homes. Rather than undertaking this exercise, however, the SA simply seeks to justify the Council’s intended approach to the housing requirement rather than framing and testing reasonable alternatives to it.

Housing Requirement (Changes Requested)

2.1.33 To support the soundness of the Plan, we recommend the following changes and modifications:

Adopt a plan period of 2025–2045 to satisfy NPPF paragraph 22.

Set a housing requirement above LHN, informed by:

- higher demographic need and previous rates of delivery;
- employment-led housing need linked to the 287 ha employment land provision,
- affordable housing need; and
- Future proof against potential unmet needs from Coventry.

2.2 Spatial Strategy

Settlement Hierarchy

2.2.1 Policy S1 of the RBLP identifies a settlement hierarchy and states that new development should be of a scale commensurate with the services and facilities of the settlement. The settlement hierarchy identifies three tiers of settlements, with the Rugby urban area sitting at the top, followed by the main rural settlements and other rural settlements.

2.2.2 Overall, we consider that the settlement hierarchy, as presently drafted and as it relates to the position of Rugby Town is sound and justified by the evidence base.

Spatial Apportionment of Housing

- 2.2.3 Policy S2 establishes the overall housing strategy and identifies the sources of supply that will contribute towards meeting the Borough’s requirement. To articulate the spatial strategy more transparently, we recommend that the housing figures in Policy S2 are also disaggregated by tiers of the settlement hierarchy, supported by a clear explanation of the intended role and function of each tier. This would provide a more coherent link between the distribution of development and the hierarchy’s purpose.
- 2.2.4 Paragraph 1.21 of the RBLP confirms that the Rugby urban area is the primary focus for new homes. Given the Borough’s geography, the concentration of services and facilities, and the settlement hierarchy, a strategy centred on Rugby Town is both logical and inevitable. However, despite Rugby’s primacy in the strategy, a significant proportion of new growth is directed to rural settlements, many of which are objectively less sustainable than Rugby Town.
- 2.2.5 Rugby Town has demonstrably strong sustainability credentials. It contains the Borough’s only railway station and is the focus of the Rugby Regeneration Strategy, in which delivering new homes is a central priority. Well-planned growth on the edge of Rugby also provides opportunities to enhance green infrastructure, create new public open spaces, and improve access to recreation close to where people live, including in areas of Green Belt that are well-related to the urban edge.
- 2.2.6 While urban capacity forms an important component of the supply, the 16 allocations within Rugby Town collectively amount to 703 dwellings and consist largely of small sites, on previously-developed land. Because of their scale, these sites also have limited ability to support wider infrastructure or provide meaningful levels of affordable housing. This reinforces the need for a balanced portfolio of sites, including strategic allocations on the edge of Rugby Town.
- 2.2.7 As set out in the Regulation 19 SA, the Sustainable Urban Extensions (“SUEs”) have historically faced challenges, but they also offer the scale necessary to deliver infrastructure and affordable housing that smaller urban sites cannot. A strategy that avoids SUEs entirely in an attempt to correct the “mistakes of the past” risks overlooking the significant benefits they can provide when planned and phased appropriately as part of a balanced portfolio of sites.
- 2.2.8 The issues identified at North West Rugby are typical of any large SUE; however, the SA indicates that it could still deliver 20% affordable housing, which is not unusual for a scheme of this scale. The SA unfairly contrasts this with a 40% affordable housing “golden rule,” which has been derived from considerations of small-to-medium Green Belt releases in rural settlements. That benchmark is not an appropriate comparator for an SUE. Within the SA, there appears to be a disproportionate focus on the delivery and viability challenges of SUEs, with far less scrutiny applied to the urban sites, despite the SA itself recognising their “high delivery risk and/or viability challenges.”

2.2.9 The SA further states that there is a “reduced case for allocation in quantitative terms” for North West Rugby because it is not grey belt, faces viability challenges, and no longer requires a secondary school to the north of the town. Nonetheless, the site is retained as a reasonable alternative for appraisal. We do not accept that there is a reduced quantitative case for allocation, particularly in light of the housing requirement issues outlined earlier. Moreover, the change in position regarding the need for a secondary school to the north of Rugby is neither clearly justified nor consistent with previous consultation material.

Green Belt

2.2.10 In reviewing the Green Belt Contribution Study: Stage 2 Site Contribution Assessments, we note that the majority of the site is assessed as Green Belt land “potentially not suitable for definition as grey belt land.” We comment further on this below.

2.2.11 With regard to Green Belt Purpose A (i.e. checking the unrestricted sprawl of large built-up areas) the Study concludes that the Site makes a strong contribution. It is not disputed that Rugby constitutes a large built-up area. However, the Study’s reasoning contains a number of inconsistencies and omissions that cast doubt on the robustness of this conclusion.

2.2.12 First, the assessment describes the parcel as containing “very limited urbanising development.” While that may be accurate within the parcel boundary itself, the analysis gives only limited weight to the substantial urbanising influences immediately surrounding the site. To the north, the M6 motorway forms a significant and visually dominant piece of infrastructure. Along the eastern boundary lies a consolidated area of commercial development, comprising large-scale industrial and warehousing buildings which exert a considerable urbanising influence on the site. To the south, the settlement of Newbold forms a contiguous part of the wider built-up area of Rugby. All of these features collectively narrow the perceived openness of the Site and provide containment to future expansion. The Study’s description of these influences as merely “some” urbanising effect does not appear to reflect their scale or prominence.

2.2.13 Second, the Study states that there are “no physical features in reasonable proximity strong enough to restrict and contain development.” This conclusion is difficult to reconcile with the evidence. The surrounding motorway, industrial estate, and established residential areas all represent strong built elements which visually and physically contain the site to varying degrees. Furthermore, the western boundary is formed by Harborough Road, classified as a B-road. The Study’s characterisation of this as a “minor road” appears inaccurate, and risks underplaying its role as a clear and defensible boundary. The topography of the land, which provides further containment to the west, is also not addressed.

2.2.14 The findings of the Rugby Borough Landscape Sensitivity Assessment further reinforce the presence of significant urbanising and industrial features in the local landscape. The

Assessment identifies pylons, overhead wires, the prominent CEMEX Rugby Cement Plant approximately 970 metres to the south-west, and extensive warehousing to the south-east as dominant elements of the skyline. To the east, rising landform, sporadic tree cover, and additional pylons further shape the environment. Taken together, these features demonstrate that the wider landscape surrounding the Site already exhibits a pronounced degree of urban and industrial influence.

2.2.15 In light of this evidence, the assessment of Purpose A has not fully or accurately reflected the context of the Site. The Study appears to give insufficient regard to the major containment features and the substantial urban influences in the immediate surroundings. As a result, the conclusion that the site makes a strong contribution to preventing the sprawl of Rugby is not well founded.

Supply Buffer

2.2.16 The housing requirement and the plan-led supply to meet that requirement are distinct but related matters. Paragraph 1.22 of the RBLP sets out that supply is allocated for 8.5% more than the minimum required. Whilst we support the principle of a supply-side contingency, we are concerned that 8.5% is insufficient to allow the RBLP to respond to unforeseen events or stalled delivery. Of course, there is no single scientific or “correct” approach to the level of the buffer, but circumstances in Rugby Borough indicate that a higher buffer should be entertained than 8.5%, namely:

- As set out in the Development Needs Topic Paper (December 2025), the current Local Plan was adopted with a supply-side buffer of 17.5%; and
- By its own admission, the Council has SUEs that are struggling to deliver the required number of new homes and as these sites will remain a significant source of supply within the Plan period to 2042, this would suggest that caution is warranted and therefore a higher buffer

Spatial Strategy (Changes Requested)

2.2.17 To support the soundness of the Plan, we recommend the following changes and modifications:

- Disaggregate the housing requirement in Policy S2 by settlement tiers and define the role and function of each settlement in the spatial strategy;
- Review the findings of the Stage 2 Green Belt study particularly in regard to the conclusion around the Site’s contribution to “Purpose A”;

- Increase the supply-side housing buffer above 8.5% (to a materially higher figure) of between 15% and 20%; and
- Allocate site 114 (North West Rugby) for residential development

3. North West Rugby

3.1 Introduction

3.1.1 As set out above, Allesley and Boveton are promoting Land at NW Rugby for strategic, mixed use development. Below we set out our representations on the planning merits of this site with reference to the evidence base.

3.1.2 The Site is not proposed for allocation within the RBLP but has been assessed as a high-performing reasonable alternative for a new SUE adjacent to Rugby. The Sustainability Appraisal of the growth scenarios shows that those which include NW Rugby perform well when compared to both the preferred option and other reasonable alternatives. In light of our wider comments regarding the housing requirement, we consider that there is a robust case for the RBLP to allocate the Site.

3.2 Site-Specific Representations

3.2.1 The Stage 2 Site Options Assessment draws on the earlier Housing and Economic Land Availability Assessment (“HELAA”) and comprises sites which passed the initial sifting exercise undertaken as part of the HELAA.

3.2.2 In respect of transport, it is noted that National Highways (NH) were consulted. NH noted a likely “very significant” impact on the Strategic Road Network junction near M6 Junction 1 due to the development quantum and indicated that merge/diverge assessments would be required. Allesley and Boveton remain committed to working with the local highway authority and National Highways to understand the necessary mitigation measures. We would also note that the Site offers the potential to deliver a link road, which preliminary transport evidence suggests could improve traffic flows.

3.2.3 The site assessment evidence mentions potential impact on Brownsover Road, which it records to be unsuitable for a vehicular point of access given the narrow and weak canal bridge. There are, however, opportunities to manage the potential changes to the use of the bridge. In order to encourage active travel, dedicated pedestrian and cycle facilities could be provided over the bridge. This would involve dedicating part of the existing carriageway to be used only by pedestrians and cyclists. The remaining carriageway could be used by traffic as a one-way operation only. The one-way operation would need to be controlled by traffic signals to implement a shuttle working arrangement.

3.2.4 The existing weight limit on the bridge is 7.5 tonnes. As a short span structure axle load is likely to be the key loading factor. A predominately residential development will mostly generate additional car trips. Car axle loads will not exceed 7.5 tonnes and therefore the bridge is likely to be able to accommodate an increase in the volume of car traffic. Further exploratory work

could be undertaken, including reviewing the previous assessment completed to impose the weight limit, and consider the parapets, to confirm that the bridge can safely accommodate an increase in car traffic. If necessary, bridge strengthening and parapet improvements can be completed to make the bridge suitable for increased use.

- 3.2.5 The canal bridge is therefore not an insurmountable constraint to a development on the Site.
- 3.2.6 In terms of sustainable travel, the Site has the potential to deliver substantial improvements to walking and cycling connectivity, along with the provision of an enhanced bus service.
- 3.2.7 It is noted that the Site lies near a Scheduled Monument (Shrunken Village) toward its north-eastern corner, though the setting has already been compromised by the nearby road network and modern industrial estates. There are no listed buildings or conservation areas within the Site. Any nearby heritage assets can be sensitively addressed through appropriate masterplanning and landscape treatments.
- 3.2.8 In reviewing the SA’s assessment of “Accessibility to Community Infrastructure,” North West Rugby is not attributed any positive score on the basis that there is no longer considered to be a strategic need for a secondary school at this location. This reasoning appears unduly narrow. Secondary school provision represents only one aspect of community infrastructure, and its absence does not negate the broader capacity of a Strategic Urban Extension (SUE) to deliver a wide range of community facilities. SUEs, by virtue of their scale, typically offer significant opportunities to provide new local centres, open space, health provision, early-years facilities, and other forms of community infrastructure that smaller dispersed allocations cannot viably support.
- 3.2.9 By contrast, the SA attributes a favourable score to the preferred spatial option—largely comprising small and medium-sized sites—even though such sites in most cases have limited potential to bring forward meaningful infrastructure beyond on-site open space or modest Section 106 contributions. The SA therefore appears to take an inconsistent approach, recognising the infrastructure benefits of smaller sites while failing to account for the well-established ability of SUEs to deliver more substantial and integrated community infrastructure. In this respect, we do not think that the SA’s conclusion is well-founded, as it does not reflect the relative infrastructure potential of the strategic options being assessed.
- 3.2.10 The SA acknowledges that the North West Rugby site is not itself at risk of flooding, and further recognises that development in this location has the potential to deliver wider flood-risk mitigation benefits across the catchment. Despite this, no positive score is awarded under the Climate Change Adaptation objective. This appears anomalous.
- 3.2.11 The ability of a site to contribute to strategic flood-risk betterment—particularly where downstream areas are known to be sensitive—is a material consideration directly relevant to

climate resilience. SUEs can, through their scale and masterplanning capacity, integrate sustainable drainage systems, attenuation features, and green infrastructure that cumulatively deliver benefits beyond the site boundary. It is therefore unclear why the SA acknowledges this potential in narrative form but declines to reflect it in the scoring.

3.2.12 In the absence of clear justification, the decision not to award a positive score appears inconsistent with the evidence cited by the SA itself.

4. Summary & Conclusion

- 4.0.1 These representations have identified several significant shortcomings in the Rugby Borough Local Plan which, in its current form, prevent it from meeting the tests of soundness set out in the NPPF. The Plan’s housing requirement is limited to the minimum Local Housing Need figure and is not supported by the demographic, economic or affordable housing evidence. The failure to consider higher-growth alternatives, including those capable of supporting the Borough’s economic strategy or addressing acute affordable housing needs, gives rise to a materially deficient evidence base. The proposed plan period to 2042 is similarly inconsistent with national policy and requires extension to 2045.
- 4.0.2 The Sustainability Appraisal does not robustly evaluate reasonable alternatives, applies inconsistent scoring across strategic and non-strategic options, and does not accurately reflect the infrastructure, climate resilience or deliverability benefits of Strategic Urban Extensions. In relation to North West Rugby specifically, the SA’s treatment of community infrastructure, climate change adaptation and viability issues is neither proportionate nor justified.
- 4.0.3 The Stage 2 Green Belt Assessment also contains material inaccuracies and omissions. It underestimates the extent to which the site is already influenced and contained by substantial built and infrastructural features, and overstates its contribution to preventing sprawl. In addition, the proposed supply-side buffer of 8.5% is insufficient when measured against delivery risks, past performance, and the Council’s continued reliance on strategic sites.
- 4.0.4 Taken together, these matters indicate that the Plan is not positively prepared, justified, effective or consistent with national policy. However, these concerns are capable of remedy. By adopting a longer plan period, increasing the housing requirement above LHN, applying a more appropriate supply buffer, and allocating additional sustainable sites—including North West Rugby—the Council can strengthen the evidence base and secure a sound spatial strategy.
- 4.0.5 North West Rugby represents a highly sustainable, well-performing and deliverable location for growth. It has the capacity to support strategic infrastructure, provide meaningful affordable housing, enhance sustainable travel networks and contribute positively to climate resilience. The evidence consistently demonstrates that the site performs strongly relative to both the preferred option and other reasonable alternatives. Its allocation would materially improve the robustness and effectiveness of the Plan.
- 4.0.6 For these reasons, Allesley and Boveton respectfully request that the Council gives full and careful consideration to the modifications proposed in these representations. With these changes, the RBLP can be made sound and capable of supporting Rugby’s long-term housing, economic and environmental objectives.



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