

## Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

**Name of the Local Plan to which this representation relates:** Rugby Borough Council Proposed Submission Local Plan

**Please return to Rugby Borough Council by 5:00pm Friday 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with **Proposed Submission Consultation in the subject line, OR by post to:** Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –  
Part A – Personal Details: need only be completed once.  
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

#### 2. Agent's Details (if applicable)

Title	Mr	
First Name	Richard	
Last Name	Crosthwaite	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		

## Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	Page 6 Objectives	Local Plan Policy	S1, S2, S3, S6, S7.	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	x
(2) is Sound	Yes		No	x
(3) complies with the Duty to co-operate	Yes		No	

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached representations

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached representations

(Continue on a separate sheet /expand box if necessary)

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please see attached representations

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

N/A

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:

<https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>

Proposed Submission Consultation,  
Development Strategy Team,  
Town Hall,  
Evreux Way,  
Rugby,  
CV21 2RR

Sent by email only to: [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk)

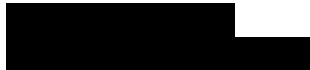
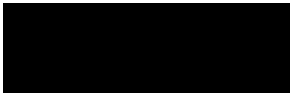
13 March 2026

**Ref: Rugby Borough Local Plan 2025 – 2042 Proposed Submission Version, January 2026**

Dear Development Strategy Team,

Further to the publication of the Rugby Borough Local Plan 2025 – 2042 Proposed Submission Version, please find the enclosed representations relating to Land to the North of the M6, Rugby.

Yours faithfully,



enc.

## Contents

1.	Introduction.....	
1.1	Rugby Local Plan 2025 – 2042 Proposed Submission Version .....	2
1.2	Background.....	3
2.	Representations to the Rugby Borough Local Plan Proposed Submission Version (Regulation 19)	
2.1	Objectives & Key Diagram .....	4
2.2	Strategy.....	5
3.	Land to the North of M6 Junction 1, Rugby .....	
3.1	Site Description.....	8

## Appendices

Appendix A – Site Location Plan

Appendix B - Site Opportunities and Constraints Plan

# 1. Introduction

## 1.1 Rugby Local Plan 2025 – 2042 Proposed Submission Version

- 1.1.1 The following representations are made in response to the Rugby Local Plan Review (RLPR) Regulation 19 Proposed Submission Version (January 2026) 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. Catesby Estates submitted representations relating to the site in response to the Regulation 18 Preferred Options Consultation in March 2025.
- 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; Site 142 Land off A5, Churchover; and through a combined assessment as Site 323 Land at Churchover (Residential or Employment). 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 (December 2025), 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 and mitigation, 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<sup>1</sup>; 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 representation form and this supporting statement will be submitted via email to [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with the subject of ‘Proposed Submission Consultation’ in line with the Statement of Representations Procedure.

## 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 proposed plan period and beyond.
- 1.2.3 Catesby Estates would request the opportunity to progress these submissions through the Local Plan Examination in due course.

---

<sup>1</sup> **NPPF Footnote 20:** Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in Paragraph 62 of the NPPF.

## 2. Representations to the Rugby Borough Local Plan Proposed Submission Version (Regulation 19)

### 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 As drafted, the Objectives will not accord with Paragraph 7 of the NPPF, which states that the purpose of the planning system is to contribute to the achievement of sustainable development, where this is defined to include "the provision of homes, commercial development and supporting infrastructure in a sustainable manner."

2.1.3 In addition, the lack of any Vision in the drafted Plan is in conflict with the requirements for Plan making, where NPPF para 15 states that Plans "...should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; ....

2.1.4 The Strategic Priorities and Policies make reference to the delivery of housing, and there are specific policies on such development, but those priorities do not correlate with the Objectives set out in the Plan's introduction.

2.1.5 As drafted, the Council's objectives do not include for or refer to the delivery of new homes, one of the most central elements of the delivery of sustainable development and essential for setting out and ultimately delivering a positive vision for the Plan.

2.1.6 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 and a positive vision for the future of the area. 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.

2.1.7 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.

2.1.8 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 is a location that can support wider than local economic development. An ambitious growth strategy should be embedded into the Plan's Objectives and Vision, fully addressing the availability of ambitious and sustainable development opportunities at Rugby town.

- 2.1.9 The Local Plan Objectives should be amended, and developed into a positive Vision for the Plan, clearly identifying how the Council will deliver spatial growth, and the delivery of economic and residential development, plus infrastructure, whilst protecting environmental assets and contributing to green initiatives and associated infrastructure.
- 2.1.10 As drafted, the Objectives are inadequate, and the lack of Vision for the Plan means it is failing NPPF requirements and is unsound as it is not consistent with national policy.
- 2.1.11 Further, it is noted that the Plan period has changed from the Regulation 18 consultation and has now been shortened in length from 2024-2045 (21 years) to 2025 – 2042 (17 years) with no explanation or reasoning as to why this has occurred.
- 2.1.12 NPPF paragraph 22 states that Plans should contain strategic policies which cover a minimum 15 year timeframe from adoption. Further, where plans contain larger-scale developments, policies should be set within a vision that looks at least 30 years ahead, to take into account likely timescales for delivery.
- 2.1.13 With a Plan period ending in 2042, and assuming the Plan is submitted for Examination by summer 2026, adoption is not likely to occur until well into 2027. On that basis, a 15 year time period from adoption would be 2041. Whilst the Plan may just then cover the minimum timeframe of 15 years from adoption, it leaves little room for any delay to the Plan submission or Examination. The Authority should therefore revert to the Local Plan end date of 2045, which was set out at the Regulation 18 stage.

## 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. Rugby town is stated to be the main focus for new homes and employment over the plan period and this is supported. Opportunities to expand the urban area of Rugby town 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 at Rugby town, 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.
- 2.2.2 To be fully justified, effective and consistent with national policy, the Council should ensure the Plan reflects the proposed settlement hierarchy by identifying sites for development that fully reflect it. There are further sites around Rugby town which

could suitably deliver development in the most sustainable location within the Borough, and which should be considered to accommodate further development, outside of the Green Belt, in more sustainable locations than those currently identified for allocation.

### **S2 Strategy for homes**

2.2.3 The Regulation 19 Plan has shortened the plan period from that proposed at the Regulation 18 stage. The Regulation 18 Local Plan made provision for 13,978 homes across a period 2024-2045. The Regulation 19 Local Plan makes provision for just 10,912 homes over the period 2025-2042 to accord with the 636 dwelling per year requirement under the standard method for local housing need. There is no clear rationale set out for this change.

2.2.4 There is no objection in principle to the use of the standard method as a starting point in setting the housing requirement, however, Policy S2 as drafted indicates that the housing figure is a maximum, and that no further housing will be required beyond this. This is inconsistent with national policy, which is clear that the Standard Method establishes the minimum number of homes needed per annum, not the maximum. The standard method should be considered as a starting point (NPPF para 62). Consideration should also then be given to other factors, such as the ability for the area to support economic growth or significant employment expansion over the plan period, and any requirement to meet unmet housing and employment needs from the wider area.

### **S3 Strategy for employment land**

2.2.6 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 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.

### **S6 Residential Allocations**

2.2.8 Policy S6 seeks to allocate the land that is required to meet the housing requirement over the plan period.

2.2.9 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 plan period and beyond. 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.

2.2.10 **S7 Employment allocations**

2.2.11 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

2.2.12 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

	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 outside of the Green Belt. The location adjacent to M6 J1 provides a significant opportunity to deliver much needed economic growth alongside a sustainable new community.

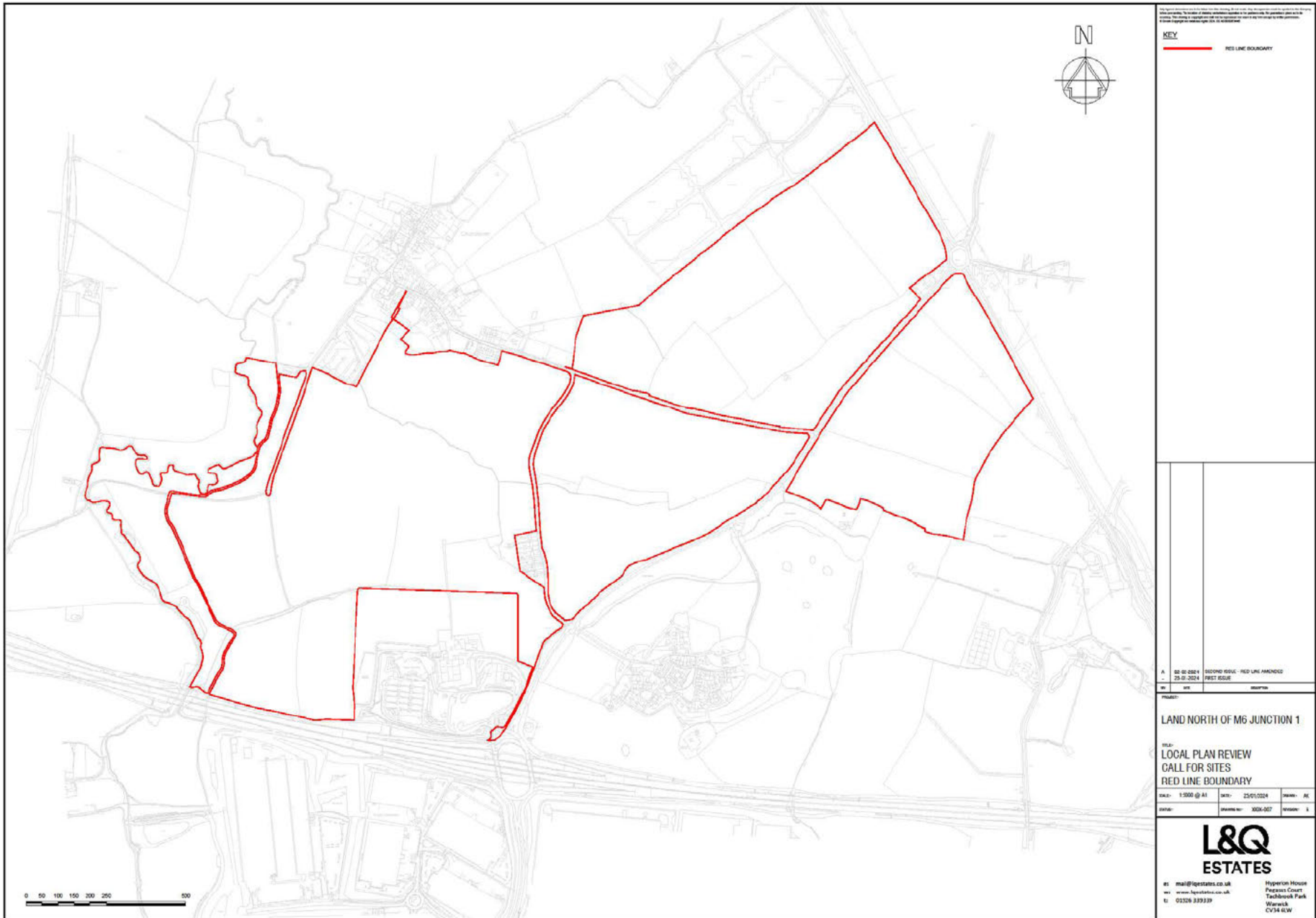
3.1.5 The outcome of the Stage 2 Assessment is that the Site has not been progressed to further consideration through the Sustainability Appraisal. Notwithstanding this, the site remains suitable, available and achievable; it has strong potential to accommodate the development needed to support ambitious 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 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
  - 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.

## Appendix A – Site Location Plan

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



**KEY**  
— RED LINE BOUNDARY

A 22.02.2024 25.02.2024  
 25.02.2024  
 25.02.2024

PROJECT:  
**LAND NORTH OF M6 JUNCTION 1**

TYPE:  
**LOCAL PLAN REVIEW  
 CALL FOR SITES  
 RED LINE BOUNDARY**

DATE: 1/2024 @ A1 DATE: 25/01/2024 SCALE: A1  
 SHEET: 0001-001 SHEETS: 1

**L&Q**  
**ESTATES**

01 mail@lqestates.co.uk Hyperion House  
 01 www.lqestates.co.uk Parkway Court  
 01 01206 993939 Tachbrook Park  
 Warwick  
 CV34 6LW

## Appendix B - Site Opportunities and Constraints Plan

Site Opportunities and Constraints Plan – Land to the North of M6 Junction 1, Rugby

