

**REPRESENTATIONS: RUGBY BOROUGH LOCAL
PLAN REGULATION 19 CONSULTATION
DOCUMENT MARCH 2026.**

Land West of Barby Lane, Hillmorton, Rugby.

On behalf of Catesby Strategic Land Limited.

Date: February 2026 | Pegasus Ref: P25-1170

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1. Introduction

- 1.1. These representations are made by Pegasus Group, on behalf of Catesby Strategic Land Limited, in response to the Proposed Submission (Regulation 19) consultation for Rugby Borough Council's Local Plan.
- 1.2. Catesby Strategic Land Limited have interests in Land west of Barby Lane, Hillmorton, Rugby (hereafter 'the Site') as identified in the document at Appendix 1.
- 1.3. The review of the Rugby Borough Local Plan 2011–2031, adopted in Jun 2019 is welcomed as it accords with Paragraph 34 of the NPPF which requires that policies in local plans should be reviewed every five years to determine whether or not any updates are required. As the adopted plan is over five years old, the preparation of a new Local Plan is supported.
- 1.4. Catesby Strategic Land Limited welcome this opportunity to engage with the Council and are keen to work collaboratively to ensure that a sound and robust plan is submitted for examination which provides an appropriate planning framework for Rugby.
- 1.5. These representations have had regard to the published Proposed Submission Local Plan consultation documents, documentation forming the evidence base and the national planning policy context. The representations are set out so as to respond to Sections and Policies of the consultation document Local Plan.
- 1.6. To be found legally compliant, development plans need to meet the tests of soundness, set out in Paragraph 36 of the NPPF, which are set out below:
 - a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹; 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;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **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
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

¹ **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.



17. These representations respond to the draft Plan with reference to the soundness of its policies and proposals, in line with NPPF paragraph 36.
18. The representation form and this supporting statement will be submitted via email to localplan@rugby.gov.uk with the subject of 'Proposed Submission Consultation' in line with the Statement of Representations Procedure.

2. Objectives and Strategic Priorities

- 2.1. The Council's Objectives remain brief in nature in the Regulation 19 Plan and are not supported by any Vision for the Plan.
- 2.2. 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."*
- 2.3. 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;"*
- 2.4. 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.
- 2.5. As drafted, the Council's objectives do not include for or refer to the delivery of new homes, one of the elements of the delivery of sustainable development and part of delivering a positive vision in the Plan.
- 2.6. The Plan's objectives are therefore unsound by omission: it is imperative for them to include such reference, not least because national policy emphasises the importance of planning to meet the housing needs of the area.
- 2.7. In addition, the Objectives should be amended, and then also developed into a Vision for the Plan, positively 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 infrastructure.
- 2.8. 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.
- 2.9. 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.
- 2.10. 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.
- 2.11. With a Plan end period of 2042, and assuming the Plan is submitted for Examination by summer 2025, adoption is not likely to occur before mid to late 2026 at the earliest. On that basis, a 15–year time period from adoption would be 2041. Whilst the Plan therefore covers the minimum timeframe, it leaves little room for any delay to the Plan submission or Examination.



2.12. The Authority should therefore consider reverting to the Regulation 18 Plan end date of 2045.

3. Strategy

Policy S1: Settlement Hierarchy

- 3.1. The draft policy is supported in principle, as it sets out a hierarchy for the delivery of development across the Plan period, with a settlement hierarchy that directs development to the most sustainable locations, in accordance with the requirements of NPPF paragraph 7.
- 3.2. The Policy identifies Rugby as the main focus for homes and employment development across the Plan period. This is supported, but the Plan must ensure all opportunities to deliver development within and adjacent to the Borough's most sustainable location are promoted and identified, before allocating development in less sustainable locations.
- 3.3. To be fully justified, effective and consistent with national policy, the Council should ensure the Plan reflects the proposed settlement hierarchy and identifies sites for development that reflect the hierarchy proposed fully. There are further sites around Rugby which could suitably deliver development in the most sustainable location within the Borough, and which should be considered to accommodate further development in a more sustainable location than sites which may be in the Green Belt (also see comments below on sequential matters for the release of Green Belt land), or sites in smaller settlements and villages.

Policy S2: Strategy for Homes

- 3.4. The Regulation 18 Plan was making provision for 13,978 homes across the proposed Plan period 2024-2045.
- 3.5. The Regulation 19 Plan has shortened the Plan period which is now proposed as 2025-2042 (comments are made on this in Section 1 above). The Plan is to make provision for 10,812 new homes (636 per year in accordance with the standard method for local housing need).
- 3.6. There is no objection in principle to the use of the standard method although Policy S2 as drafted indicates that the housing figure is a maximum, and that no further housing will be required beyond this. However, 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 a starting point (NPPF para 62).
- 3.7. The proposed number of dwellings is also inconsistent with the Sustainability Appraisal (SA) of March 2025 which supported the Regulation 18 consultation.
- 3.8. The SA is a legal requirement and an integral part of Local Plan preparation, which should provide the evidence to inform, and the framework to tests and develop options for Local Plan preparation, helping to deliver a more sustainable strategy, which in turn helps justify the Local Plan.
- 3.9. The March 2025 SA identified that the 'preferred option' growth scenario for housing delivery to be 14,134 homes across the Plan period (which included a 9% buffer), against an overall need to identify supply for at least 13,600 new homes (Box 5.2).
- 3.10. The December 2025 SA Report does not test the now proposed Plan period or now proposed quantum of development against other reasonable alternatives and instead has

been written as an appraisal of what is proposed, fitting the evidence base to the Plan as proposed. The SA is therefore unsound in this regard.

- 3.11. In addition, the updated Housing Needs Evidence (September 2025) now omits any reference to that of the November 2022 assessment which suggested that, on a trend based scenario, 735 dwellings per annum could be required in Rugby.
- 3.12. The 2025 SA Report identifies that the net need for affordable housing is 202 homes per year, 35% of the annual standard method requirement (636 dwellings per annum). The SA states that this is 'quite high' as a proportion of local housing need *"such that a requirement set at LHN would not provide for affordable housing need in full ..."*.
- 3.13. Paragraph 2A-024 of the Planning Practice Guidance (PPG) states that higher housing figures may be needed where this could help deliver the required number of affordable homes. Therefore, the evidence base highlights how a greater number of dwellings than 636 per annum may be required. To be fully justified this position must be taken into account.
- 3.14. Moreover, the Council's housing figures do not factor in any unmet need from neighbouring authorities which may need to be accommodated in Rugby to be consistent with national policy. Whilst the Duty to Co-Operate has now been abolished Para 62 of the NPPF remains relevant and 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 now appear to be able to meet all of their need, the Greater Birmingham and Black Country Housing Market Area have identified significant shortfalls, a matter which will be further established within the West Midlands Spatial Development Strategy, which will be relevant to Rugby.
- 3.15. Prepared by the West Midlands Combined Authority (WMCA), the SDS will set out a long-term plan for new homes, jobs, transport and green spaces across the whole region.
- 3.16. The SDS spatial strategy for the delivery of homes will include for cross- boundary challenges and meeting the housing need across the whole region. Rugby should be cognisant of this and plan to meet its own need and potentially deliver for the unmet need of other authorities within the SDS area. This must be recognised and entrenched in the Plan and is a reason why the housing figures must not be treated as a maximum.
- 3.17. It is also appropriate to consider past delivery rates when considering the appropriate housing figures that Rugby should be planning to deliver. Evidence on past delivery in the Council's 5YHLS position 2024-2029 identifies that against a housing target of 636 dwellings per annum, the Council have exceeded that for the 6 years from 2018 delivering more than 1,000 dwellings in excess of its housing targets.
- 3.18. This suggests that the Council could, in fact, plan for more housing, which would assist in delivering additional affordable housing to meet the identified need, and which could also contribute for unmet needs in neighbouring authorities without undermining the deliverability of the Plan.
- 3.19. To summarise, whilst Policy S2 is acceptable in principle it has not been fully evidenced and therefore is not justified and should, as a minimum, be amended to be a minimum housing target. The SA work must also look at the now shortened Plan period and reduced housing



requirement from the Regulation 18 Plan, to establish this as a reasonable alternative and determine whether it is a sustainable strategy when considered against other options.

Policy S6: Residential Allocations

- 3.20. Notwithstanding the comments made on housing targets in relation to Policy S2, the Council's draft Policy S6 is supported in principle as it seeks to identify land to meet the Council's perceived housing needs. It also includes a range of sites to deliver that target, in accordance with NPPF para 73 which is clear that small to medium sized sites can make an important contribution toward an area's housing supply.
- 3.21. It also focuses development on the Borough's most sustainable location, which is in and around Rugby. This is also supported in principle, but the Council's reliance on strategic sites and urban extensions to deliver that is not supported.
- 3.22. The policy (along with S2) includes significant reliance on committed urban extensions, which comprise over 7,000 dwellings in the identified committed supply.
- 3.23. As identified in the which have faced delivery challenges during the current Plan period, as identified in the Sustainability Appraisal (March 2025) and reiterated at para 2.3.6 of the December 2025 SA, their deliverability during the Plan period should therefore be robustly evidenced if it is to be found sound.
- 3.24. The December 2025 Topic Paper: Development Needs does not set out the date on which permissions would expire, if not implemented or confirm that work has commenced to implement the permissions, to demonstrate that the sites are deliverable and justified to be included in the committed supply. Sites must be available, achievable and deliverable and the information provided I the Topic Paper does not robustly demonstrate this. The Council's land supply position is therefore not fully justified and is not sound.
- 3.25. The Council's release of land in the Green Belt to deliver residential development in the villages is also not fully justified and sound. The Plan at paragraph 1.5 refers to the Council's proposed allocations of land for 1,653 homes in the Borough's rural settlements and villages, noting that *"These villages mostly lie within the Green Belt and alterations to Green Belt boundaries are made."*
- 3.26. The Green Belt Exceptional Circumstances Topic Paper (December 2025) identifies (page 21 onwards) that Green Belt housing allocations total 1,436 dwellings in various locations. It also suggests that there are a number of factors contributing to the exceptional circumstances for Green Belt releases in these 'village' locations, including the delivery of affordable housing which does not necessarily come forward on brownfield sits, and to diversify the housing market and encourage younger generations to stay local. This is not objected to in principle.
- 3.27. It also seeks to show that it has examined all other reasonable options to Green Belt allocation. This has not been fully justified and not all other non-Green Belt alternatives have been considered.
- 3.28. NPPF para 147 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the authority should be able to demonstrate that it has *"examined fully all other reasonable options for meeting its identified need for development."*



- 3.29. The Exceptional Circumstances Paper makes no mention of land to the south of Rugby that is available and which could deliver sustainable development, to meet need, including Catesby's land interests at Barby Lane, Hillmorton which are NOT in the Green Belt.
- 3.30. The Council's approach to the release of Green Belt land for development is therefore not fully justified, not consistent with national policy and unsound.

4. Environment

Policy EN3: Rainsbrook Valley landscape of elevated sensitivity

- 4.1. This is a new policy introduced into the Regulation 19 Proposed Submission version of the Plan.
- 4.2. The Policy has been introduced to seek to protect this defined area to the south of Rugby which is considered to be sensitive in landscape terms. It includes Catesby's land interests off Barby Lane, Hillmorton.
- 4.3. Catesby support the fact that the policy does not seek to blanket resist any development in the area; indeed, it does not seek to prevent development in the area but sets out a number of criteria with which development should comply including that the area should be protected, reinforced or enhanced with important views and locations safeguarded.
- 4.4. The Rainsbrook Valley Landscape Sensitivity Assessment (December 2025) has been undertaken to support the draft policy, and it has considered the Rainsbrook Valley as a whole, including a much wider area (as per page 7 of the Assessment) extending southwards from the southern edge of Rugby.
- 4.5. These representations do not seek to contradict the findings of the assessment as a whole, but the Assessment does not consider site specific matters, instead identifying that in essence as a constraint. Section 4.4 states that housing development within the valley could be incongruous when the southern settlement edge of Rugby is generally concealed by the ridge line. But it does also acknowledge that there may be specific land parcels where topography beyond the northern ridge line may reduce the visual profile and where existing or enhanced vegetation might provide screening. The report also acknowledges that there is some visibility of existing development at Hillmorton and development scenarios in this location could be achievable on a case by case consideration, with testing of landscape and visual impact.
- 4.6. To be fully justified, the policy should be amended to include the acknowledgement of the Council's own evidence base and ensure that it is not a blanket restriction on development in that location, but that development should be fully justified against the policy and sensitively designed and sited to ensure it complies with the policy's criteria.
- 4.7. For example, Catesby Estates' land interests off Barby Lane could accommodate development over the northern ridge line, which would not intrude into the south facing part of the valley. The development could be appropriately screened and would sit in the contest of existing development on the southern edge of the Rugby urban area and be assimilated into its context.

5. Land west of Barby Lane, Hillmorton, Rugby

- 5.1. Pegasus Group is promoting Land west of Barby Lane, Hillmorton, Rugby for residential development on behalf of Catesby Estates Plc.
- 5.2. The Site comprises approximately 4.05ha and is promoted for circa 45 residential dwellings in a sustainable location at the top of the proposed settlement hierarchy. The Site is available, deliverable and developable and it should be considered as a suitable site allocation for residential development.
- 5.3. This section begins by setting out the Site's context, prior to outlining its development potential. Assessments of the Site within the evidence base, namely in the Housing and Economic Land Availability Assessment and with reference to the Preferred Options *Sustainability Appraisal*, are then considered. Overall, it is demonstrated that this is an optimal and sustainable location for growth, which the Council should allocate for residential development, making a valuable contribution towards meeting the need for new housing in Rugby.

Site Context

- 5.4. The Site is approximately 4.05 hectares in size. It is located to the west of Barby Lane, immediately adjacent to the southern settlement edge of Hillmorton, on the edge of the Rugby urban area.
- 5.5. The Site comprises agricultural fields and wraps around the farmyard and associated agricultural buildings of Waldins Farm, the access for which crosses the site.
- 5.6. The Site is in a sustainable location, within walking distance of a good range of local services and facilities (see Figures 2 of the Location for Growth Document at Appendix 1) including local supermarkets, shops, a post office and convenience store a community centre, primary and secondary school.
- 5.7. The site is crossed by a Public Right of Way (PRoW) that aligns north-south and which connects with Ashlawn Road to the eastern side of the Ashlawn secondary school. There are bus stops on Ashlawn Road served by two services that provide access to Rugby, Daventry and Northampton and also access Rugby Train Station. Rugby Train Station is approximately 3km north west of the Site and provides access to London, Birmingham, Wolverhampton, Crewe, Preston, Liverpool and Manchester, amongst other locations.

Constraints

- 5.8. There are no significant physical, environmental, or technical constraints which would preclude development on the site. It is not covered by any statutory or non-statutory designations for landscape character or quality; hedgerows and existing boundary trees could be retained and there would be opportunities to enhance the vegetation cover on the Site. Crucially, the site is outside the Green Belt that surrounds much of Rugby and should be considered in advance of the proposed release of Green Belt land, which the Exceptional Circumstances Paper does not do.

- 5.9. Access to the development for vehicular traffic could be provided off Barby Lane through enhancing the existing farm access and the existing public right of Way that bisects the site will provide access for pedestrians and cyclists to local facilities.
- 5.10. There are no water courses within the Site it is within Flood Zone 1 at a low probability of flooding, and it is at a low risk of flooding from surface water.
- 5.11. The single overhead electricity cable that crosses the site diagonally from Barby Lane to the farm can be undergrounded or diverted.
- 5.12. Mature trees and habitats of elevated value including the hedgerows can be retained and given the current agricultural use of the Site significant opportunities exist to achieve biodiversity net gain.

Development Potential

- 5.13. A Location for Growth Document has been prepared (see Appendix 1) which sets out the principles which will guide the design of development on the Site, which include an Emerging Concept Plan (Figure 4) showing where the developable area of the Site and the dwellings could be located.
- 5.14. Development of the Site would adopt a landscape led approach retaining existing trees and hedgerows as far as possible and creating a softened transition between the new settlement edge and wider surrounding landscape. Sustainable drainage features can be positively designed into the open space and new play and recreation opportunities provided within the open space, including a circular network of leisure routes.
- 5.15. The existing site access off Barby Lane can be upgraded and enhanced and pedestrian connections delivered to the public right of way and within and across the site, giving access to local facilities and the educational establishment to the north.

Evidence Base

- 5.16. The Site was considered to be 'not currently developable' in the HELAA, mainly on the grounds that the site was part of a previously dismissed appeal in 2017 (ref: APP/E3715/W/16/3158785). In that appeal, which was for a much larger site than is now being promoted, the Inspector did note that whilst the Site has a high landscape sensitivity, which would not necessarily preclude development.
- 5.17. The site now being promoted is noted as having a high landscape sensitivity in the HELAA. It was noted though that it could provide extension land to the playing fields for the Ashlawn School and that it is adjacent to the settlement boundary.
- 5.18. Notwithstanding, the Landscape Sensitivity Assessments (March 2025), concluded that the site has an overall landscape sensitivity of Medium, not rating as 'high sensitivity' against any criteria and 'low' against a number. The Assessment concluded that the site's most significant sensitivities 'likely arise' from its intervisibility with the Rainsbrook Valley. The 2025 Rainsbrook Valley Assessment then blanket covered the site within a wider assessment area, but as set out in Section 4, the site is over the northern ridge line and can accommodate development without protruding onto the southern facing slopes, which would be more visible within the wider valley.

- 5.19. The Sustainability Appraisal does not assess the Site being promoted by Catesby specifically, but it does note that the proposed site allocation (and therefore general area given this is adjacent) benefits from good accessibility to local schools and other community infrastructure, but that it is sensitive in landscape terms, however, the proposed site allocation is noted as having been defined with specific boundary planting for containment and minimisation of landscape impacts.
- 5.20. It is considered that the Council's evidence base should be updated, and that the HELAA assessment of the Site should be updated to reflect the Landscape Sensitivity Assessment that has specifically considered the Site. The Site now being promoted is a smaller area of land than that the subject of the previous appeal, it would not extend built development further south than the existing southern edge of Rugby which is to the west, and it can be well contained and developed around the existing farmhouse, with significant and well defined landscape buffers and a landscape-led design to assimilate the site into its context on the edge of the urban area.

Summary

Suitability

- 5.21. The Site is situated in a sustainable location, as evidenced in the Council's own evidence base, near existing services and facilities on the southern edge of Rugby, and accessible by modes of transport other than the private car. There is a bus stop in proximity, providing regular services to Rugby and beyond.
- 5.22. There are no environmental, heritage, landscape, or technical constraints that would preclude development and careful design and a landscape led strategy would enable a suitable development to come forward in this location.
- 5.23. The Site would allow for a logical extension to the southern edge of Rugby at Hillmorton, which would not extend built development any further south than already exists and ensure that housing is provided in a sustainable location at the top of the settlement hierarchy, delivering sustainable development that would meet identified housing need.
- 5.24. The Sustainability Appraisal identifies the general location as a sustainable option for development and the HELAA acknowledges the Site's location on the edge of the existing urban area. This highlights that this is a suitable and optimal location for new housing which merits further consideration for allocation to make a valuable contribution towards providing sufficient homes, including affordable homes, to meet local need within Rugby, particularly given the proposed allocation to the east is considered unsound, as identified within these representations.

Achievability

- 5.25. The Location for Growth document illustrates how a high-quality and sustainable development, comprising around 45 dwellings, can be delivered on the Site, with a landscape-led approach consisting of new planting, public open space, and tree planting across the Site, resulting in ecological enhancements and biodiversity net gains.



- 5.26. There are no known constraints which would prevent the delivery of residential development on this site.

Availability

- 5.27. Catesby Estates Plc. have a land interest and are promoting the Site for residential development.
- 5.28. Catesby Estates Plc has secured legal agreements with the landowners of the Site to promote their land for residential development. The Site is therefore within the control of Catesby Estates Plc, who are committed to the delivery of around 45 new homes in this sustainable location.
- 5.29. Catesby Estates Plc.'s willingness for residential development to be delivered on this site is demonstrated through the submission of this representation and previous representations throughout the preparation of the Rugby Local Plan.
- 5.30. The site is available and could deliver housing in the early part of the plan period.

Conclusion

- 5.31. The Site is commended to the Council as a highly suitable location for housing which should be allocated for residential development in the Rugby Local Plan and help to make it sound.



Appendix 1 – Location for Growth

Location for Growth

Land west of Barby Lane
Hillmorton, Rugby

May 2025

Catesby Estates

part of Urban&Civic

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“ This document has been prepared as part of representations to the Rugby Borough Council Local Plan Issues and Options and Call for Sites Consultation. This document sets out our emerging ideas for the future development of land west of Barby Lane, Hillmorton, and explains how growth in this location will help meet local housing needs while achieving the Local Plan objectives. ”

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Introduction

Rugby Borough Council (RBC) is in the process of reviewing and updating their adopted local plan 2019 and have commenced an issues and options consultation. Running alongside the issues and options consultation RBC have also launched a Call for Sites.

This document illustrates how the Site west of Barby Lane has no major constraints preventing development, is located in a highly sustainable location, and is a logical location for new housing growth to meet local housing need. It is also confirmed that the land is available now to deliver new housing in the short term.

This document explains how the Site can deliver around 45 new homes and supporting open space. What is presented is not a fully worked-up scheme but an indication of the potential of the land to support new housing delivery.

The Site & Location

The Site is located immediately adjacent to the southern settlement edge of Hillmorton in Rugby.

The Site comprises agricultural fields and wraps around the farmyard and associated agricultural buildings of Waldins Farm. The access drive to Waldins Farm crosses the Site.

The Site measures approximately 4.04Ha / 9.98ac. The topography of the Site falls from around 122m AOD on the northern boundary to around 111m AOD on the south eastern corner a gentle gradient of greater than 1:40.

The Site's boundaries are defined as follows:

Northern boundary - is defined by a variety of uses including Ashlawn Secondary School and associated playing fields; Hillmorton and Paddox Allotment Gardens; and the rear property boundaries of Westwood Road dwellings.

Eastern boundary - is defined by a tree and hedgerow boundary, a highway ditch and verge and Barby Lane.

Southern boundary - is defined in part by mature field boundaries and in the middle by agricultural fencing delineating Waldings Farmyard.

Western boundary - is defined by hedgerow and trees.

Beyond the southern and western boundaries lies open agricultural countryside.





Figure 1. Site Location and Immediate Context

Site Sustainability

Easy access to existing local facilities and services supports the sustainability of a Site. Increased population in an area can also support the vitality of existing and new community services and facilities.

Services and Facilities

The Site is within easy walking distance (between 0.5km and 1km) of a good range of local services and facilities (illustrated at Figure 2). These include:

- Local supermarkets off Hillmorton Road (Aldi and Sainsburys Local).
- Local shops including a post office, takeaways and a co-operative off Hillmorton High Street.
- A further cluster of local shops at the junction of Hillmorton Road and Kingsley Avenue.
- Hillmorton Community Centre is hired by a range of local groups for gatherings and activities including baby and toddler groups, coffee mornings and zumba classes amongst other functions.

- Ashlawn Secondary School is located within 500m of the Site and also benefits from an existing public right of way connection from the Site to Ashlawn Road providing direct and safe pedestrian access to the school.
- Paddock Primary School and English Martyrs Catholic Primary School are within 1km of the Site and within 2km there are a further three primary schools (Eastlands Primary, Abbots Farm Junior School and Hillmorton Primary School).

For additional town level services and facilities, Rugby town centre offers a range of shops, restaurants and additional education facilities including the prestigious Rugby School.

Further higher level services and facilities are also available in the nearby Cities of Coventry, Leicester and Birmingham.

Sustainable Transport

The site is crossed by a Public Right of Way (PRoW) route aligned north to south. To the north the footpath connects with Ashlawn Road, adjacent to Ashlawn School's eastern boundary. The footpath also continues south through the agricultural fields.

The nearest bus stops are on Ashlawn Road next to Ashlawn School and are directly accessed from the Public Right of Way crossing the Site.

The bus stops on Ashlawn Road are served by the 86 and D1 services. The D1 operates hourly services between Rugby, Daventry and Northampton, with a pick up at Rugby Train Station. The 86 Service operates between Coventry and Ashlawn School via Rugby Town Centre.

Further local bus stops operate outside the Paddock Public House on Hillmorton Road, these bus stops are served by the numbers 1, 2 and D1 services. The Number 1 bus provides extensive access across Rugby including destinations such as Rugby Train Station, Rugby Gateway, Elliots Field retail area to the north west and out to the new secondary school at Houlton and the employment areas at Dirft to the east.

The closest rail station is Rugby Station approximately 3km direct line north west of the Site. The Station is accessible by local bus services. The station is currently operated by Avanti West Coast and provides off peak services to London, Birmingham New Street, Wolverhampton, Crewe, Preston and Manchester Piccadilly. Morning and evening peak services connect to Glasgow Central,

Chester, Liverpool Lime Street, Blackpool North, Carlisle and Lancaster.

West Midlands Trains also operate frequent services to Rugby from London Euston to Stafford, Stoke on Trent and Crewe or from Northampton to Birmingham New Street.

In summary there is significant potential for future residents of this Site to easily access local services and facilities on a range of public transport and foot or cycle modes. Making this a highly sustainable location.

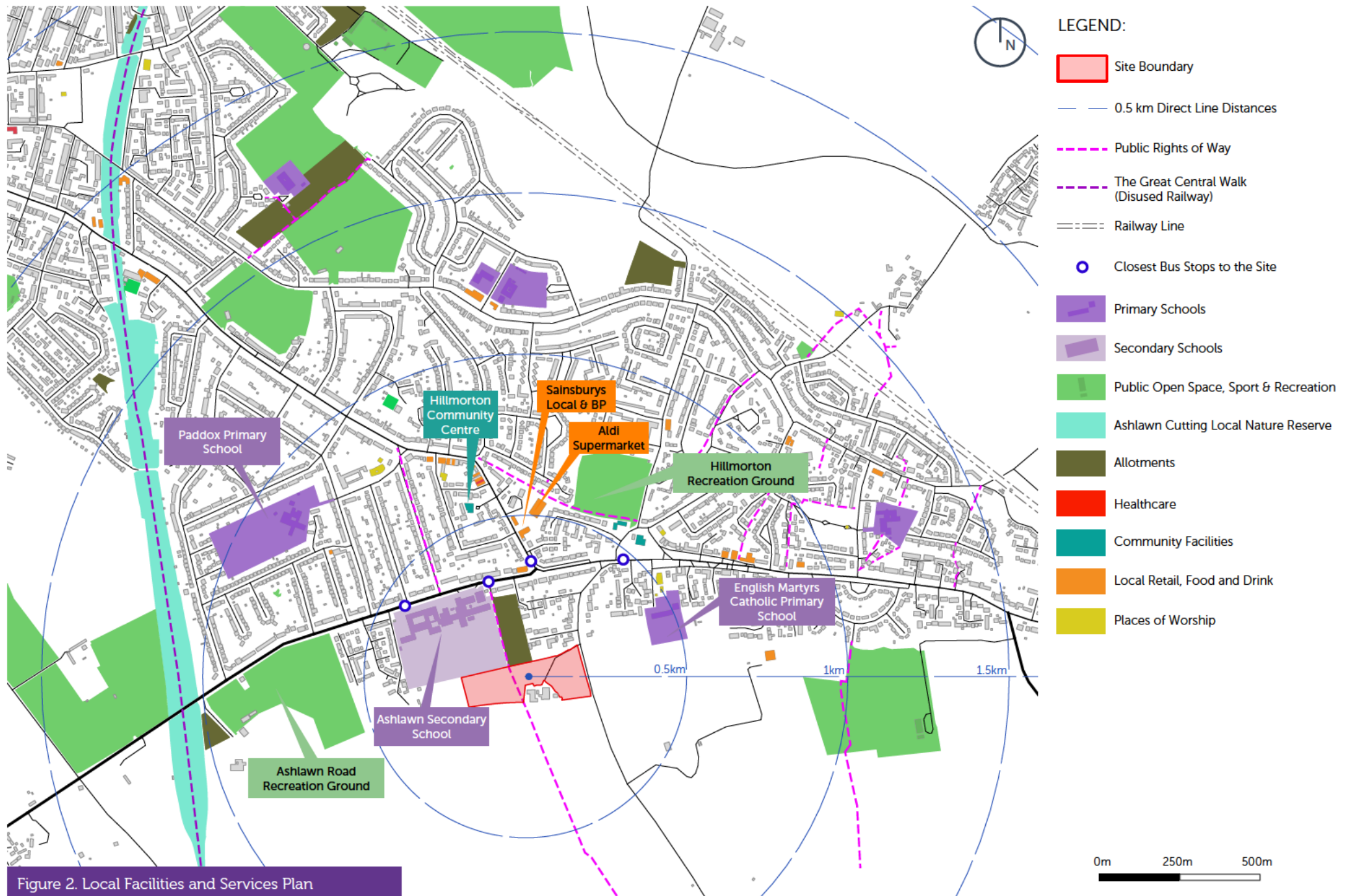


Figure 2. Local Facilities and Services Plan

Site Features

Analysis of the Site presented in the table below and Figure 3 opposite demonstrates that there are no significant physical or environmental constraints to residential development.

Feature	Summary
Topography	<ul style="list-style-type: none"> The Site has a gentle fall from the northern boundary at around 122m AOD falling towards the southern and south eastern edges of the Site at 118mAOD and 111mAOD respectively. The land to the south of the Site continues to fall in a southerly direction.
Landscape and Arboriculture	<ul style="list-style-type: none"> The Site is not covered by any statutory or non-statutory designations for landscape character or quality. The Site's landscape features are predominantly contained to the boundaries and comprise a mixture of established hedgerows with occasional tree planting. A narrow hedgerow crosses the eastern most parcels on a north to south orientation. This will be retained in any proposals. Opportunities to enhance the vegetation cover will be explored in any proposals.
Access	<ul style="list-style-type: none"> The Farm is served from an existing access off Barby Lane. The farm track crosses diagonally through the Site. This route will be maintained to serve the Farm. Access to the development parcels will be formed from enhancement to the existing junction with Barby Lane and to parts of the farm track. The existing Public Right of Way (PRoW) will be retained and new routes within the site provided to connect to the PRoW, giving direct access to Ashlawn Road, the nearest bus stops and Ashlawn Secondary School.
Hydrology	<ul style="list-style-type: none"> There are no watercourses located within the boundaries of the Site. The Site lies entirely within Flood Zone 1 (low probability of flooding). The Site is not considered to be at risk of flooding from fluvial, overland, sewer or artificial sources. There is a low risk of flooding from groundwater and surface water.
Utilities	<ul style="list-style-type: none"> A single overhead electricity cable passes diagonally across the Site from Barby Lane to serve the Farm Buildings. This can be diverted and under-grounded as part of any proposed development while maintaining supply to the Farm. An underground LV electricity cable runs parallel to the farm track crossing through the Site and will be retained.
Ecology	<ul style="list-style-type: none"> Habitats of elevated value on the Site include the hedgerows and a small number of mature trees. Reflecting the current intensive agricultural use of the Site, significant opportunities exist for on-site biodiversity enhancement, to satisfy policy requirements for 10% net gain.



LEGEND:









-  Site Boundary
-  Existing Farm Access to be Retained
-  Existing Hedgerows & Trees
-  Site Contours (0.5m)
-  Overhead Electricity Cables (to be under-grounded)
-  Underground LV Electricity Cable
-  Public Right of Way
-  Prior approval change of use of agricultural buildings to 5 dwellings (ref: R23/1030) (Required and Refused on 04.12.2023)

Figure 3. Site Features Plan



The Emerging Concept

Responding to the analysis of the Site, Figure 4 illustrates a potential development area to accommodate around 45 new dwellings and could comprise a mix of house sizes and types.

Adopting a Landscape Led Approach

Existing trees and hedgerows will be retained where possible and enhanced creating a softened transition between the new settlement edge area and wider surrounding landscape.

The provision of new green infrastructure, such as proposed landscape buffers, new tree planting and areas of amenity grassland / open space will increase the ecological value of the site, aiding biodiversity.

Sustainable drainage features can be positively designed into the open spaces should they be required. They can also support ecological and landscape quality and function. Ponds can manage surface water drainage and restrict flows to green field run off rates + climate change allowance.

Community Benefits

New children's play and recreation opportunities within the proposed public open space network can be accessed via a new circular network of leisure routes, supporting the opportunity for active and healthy lifestyles.

Connected and Permeable

The existing Barby Lane access will be enhanced to facilitate vehicular access to the development zones. Enhanced pedestrian access from this junction along Barby Lane will also be explored.

A street through the Site will provide access to dwellings. All streets, and particularly the main street will contain tree planting to supplement the character of the site and local area.

There is potential to connect onto the existing Public Right of Way providing residents with direct access to bus stops, local facilities and The Ashlawn Secondary School.

There is also scope to provide additional western leisure footpath routes within the proposed open space area.



LEGEND:

-  Site Boundary
-  Existing Farm Access to be Retained
-  Public Right of Way
-  Existing Hedgerows & Trees
-  Zone of Potential Residential Development
-  Open Space and Landscape Buffer Zones
-  Potential Internal Movement
-  Landscape Buffers / Planting
-  Leisure Footpath
-  Potential Children's Play Feature

Figure 4. Emerging Concept Plan

Climate and Energy

Recognising the sustainability of the Site, an exciting opportunity also exists for a 'step-change' in responding to climate change.

Two main considerations:

1. How the future proposals respond and adapt to the effects of climate change which are already set in motion, such as increased temperatures, flood risk and a decline in biodiversity; and
2. How the development mitigates its own impact on future climate change, in particular through reducing CO₂ emissions.

In both regards, there are a number of ways future development on the site can be 'climate proofed', and made more energy efficient and low carbon. The following provides some options to explore.

Climate Proofing

1. **Layout and orientation of development**, - balancing the benefits of minimising heat loss in winter with the risk of excessive solar gain during the summer;
2. **Drainage** - designing with future climate in mind, appreciating that the country is likely to be subject to hotter, dryer summers, wetter winters and prone to more extreme weather events. Implementation of a sustainable drainage strategy, incorporating natural solutions such as swales and ponds to attenuate rainwater, will provide resilience to future flooding whilst providing a wealth of ecological, amenity and well-being benefits.
3. **Water** - by minimising water consumption, land off Barby Lane will be resilient to and further mitigate its contribution towards a warming climate. Opportunities for rainwater and grey-water harvesting will be explored as well as other building-level solutions for reducing demand for potable water, such as low flow fixtures and fittings, leak detection and flow control devices.
4. **Adopting a natural capital based approach** - through the protection and provision of trees to provide shade and reduce wind speeds, encourage carbon sequestration. Provision of opportunities for local food production such as allotments and other community growing space.



Energy Efficient, Low Carbon Homes and Buildings

As well as considering the resilience to climate change, the development will mitigate its future impact, in particular the amount of carbon emissions associated with the development.

Reflecting the timescales for the allocation of the Site the proposals have been formulated on the expectation that all new homes will, as a minimum, be built to the Future Homes Standard that the Government has committed to introducing before 2025.

This will be achieved through a combined fabric, energy efficiency and low carbon renewable energy approach, this may include:

- for example triple glazed windows;
- Use of a range of energy efficiency and low energy lighting;
- Provision of Solar PV on all homes;
- Use of low carbon heating, for example air source heat pumps to provide low carbon heating.

This strategy will deliver homes which are Net Zero Ready, with residents able to purchase certified renewable electricity and live net zero.



What Next?

The NPPF and the Government's growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase housing supply, support growth and boost home ownership.

Reflecting its sustainable location and connections to Hillmorton, land off Barby Lane is a highly suitable location available to accommodate new residential growth.

The Site is available for development and is promoted by an established land promoter with a demonstrable track record of delivery in the county.

The Site can make an important contribution to housing needs and should be identified for development in the emerging Rugby Borough Local Plan Review.

Opening up the Opportunity

Our emerging concept for land off Barby Lane has been shaped by a desire to create a vibrant, high quality development in a sustainable location. The proposals seek to:

- Reinforce an outstanding quality of life and community, by providing a mix of house types and tenures with complementary amenities, and in particular, providing an extensive landscape and open space framework offering opportunities for all to lead a healthy and active lifestyle.
- Support sustainable modes of movement to access work, visit local services and facilities in the surrounding area.
- Nurture a healthy, varied economy that harnesses benefits of proximity to economic centres such as Rugby and more locally Dirft.
- Respond to the challenges of and mitigates the effects of climate change.

Development on the Site will finance improvements to existing infrastructure bringing wider benefits to the long term sustainability of Hillmorton.

Catesby Estates is committed to fully engaging with the local community and stakeholders to discuss and develop the emerging concept for land off Barby Lane, Hillmorton. We would welcome the opportunity to further engage with the Planning Policy team at Rugby Borough Council to facilitate the appropriate allocation for residential development.

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Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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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 13th March 2026
By email to: 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	<input type="text"/>	<input type="text" value="Miss"/>
First Name	<input type="text"/>	<input type="text" value="Sarah"/>
Last Name	<input type="text"/>	<input type="text" value="Butterfield"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="REDACTED"/>
Organisation (where relevant)	<input type="text" value="Catesby Strategic Land"/>	<input type="text" value="REDACTED"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="REDACTED"/>

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?

Paragraph	Objectives and Strategic Priorities	Policy	S1; S2; S6; EN3	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 detailed representations which refer to the Plan's Objectives and Strategic Priorities; Policy S1; Policy S2; Policy S6; Policy EN3 and make site specific comments.

(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 detailed 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:

To participate in discussions about the matters raised in these representations particularly where they relate to strategic and spatial matters and housing numbers plus site selection with reference to Green Belt.

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.

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>