

RUGBY BOROUGH LOCAL PLAN (2024 – 2042)



REPRESENTATIONS

PROPOSED SUBMISSION VERSION

February 2026

Project Name: Rugby Borough Local Plan – Regulation 19

Client Name: Cliffe Investments Limited

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Signed: B Ward MRTPI

Date: 23rd February 2026

Reviewer B Ward MRTPI

Signed B Ward MRTPI

Date: 23rd February 2026

Revision: 1

Executive Summary

Cliffe Investments Limited is promoting Land East of Kilsby Lane, Hillmorton, Rugby for residential development (“the Site”). The Site was draft allocated for residential development in the previous, Regulation 18 draft of the RBLP for 125 dwellings, but the draft allocation has not been retained given the Site’s location in a proposed area of landscape sensitivity. However, as set out within the Council’s own evidence, the Site itself is not sensitive and is, at most, only of a medium to low sensitivity. The decision to remove the draft allocation for landscape reasons is not justified, particularly given the Site’s favourable performance against Sustainability Appraisal objectives and its highly sustainable location adjacent to Rugby Town, which is to be a focal point for growth in the RBLP.

Several other aspects of the RBLP raise soundness concerns. First, the shortened plan period to 2042 risks falling below the NPPF requirement for a minimum 15-year horizon from adoption, given anticipated adoption in 2027. Second, the housing requirement is set at the minimum Local Housing Need (LHN) of 10,812 homes, despite evidence of higher demographic need (HEDNA 2022) and significantly higher recent delivery rates across the Borough. No robust evidence has been produced to test whether this minimum housing figure can support the economic strategy, particularly the 287ha of employment land proposed through Policy S3, and the Homes–Jobs Alignment Paper provides no authority for concluding such alignment at the Rugby level. Affordable housing need (474 dpa) far exceeds what could be delivered under an LHN-based requirement. In addition, the SA does not examine reasonable alternatives to the housing requirement itself, despite earlier indications that higher growth should remain under consideration and acknowledgement that Coventry’s unmet need remains unresolved.

We also have concerns regarding the robustness of the supply buffer. The RBLP proposes an 8.5% contingency, significantly below the 17.5% buffer applied in the current adopted plan, despite continued delivery challenges at the Sustainable Urban Extensions (SUEs) around Rugby and the Borough’s heavy reliance on them through to 2042.

To ensure soundness, Cliffe Investments Limited respectfully seeks the following modifications:

- Extend the plan period to 2045 to secure the required 15-year horizon.
- Set a housing requirement above LHN, informed by demographic evidence, economic growth (287ha employment land), acute affordable housing need, and potential unmet need from Coventry.
- Increase the supply-side buffer to 15–20% to reflect SUE delivery risks and market absorption constraints.

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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 Cliffe Investments Limited.
- 1.1.2 These representations are made in the context of Land East of Kilsby Lane, Hillmorton (“the Site”). The Site was draft allocated at the Regulation 18 (Draft Plan) stage for 125 dwellings (Site Reference 40). However, the Regulation 19 draft of the Plan has removed this draft allocation.
- 1.1.3 Cliffe Investments Limited contends that the decision to delete the allocation is not soundly-based, particularly given the significant evidence (set out in further detail below) that the RBLP underprovides for housing.

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** – Land East of Kilsby Lane, Hilmorton
- **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 sets out a strategy for homes and breaks the amount of housing planned for into sources of supply. To clearly articulate the Plan’s spatial strategy, we recommend that the housing figures within Policy S2 is also broken down against tiers of the settlement hierarchy and this is accompanied by a statement that clarifies the role and function of each tier of the settlement hierarchy.
- 2.2.4 Paragraph 1.21 of the RBLP sets out that new homes will be focused at the Rugby urban area. Given the spatial characteristics of the Borough and the settlement hierarchy, we consider that a principal focus on Rugby as a focal point for growth is inevitable. Despite the primacy of Rugby within the growth strategy, there is a very high level of committed growth through adopted local plan. As recorded at various points within the SA Sustainable Urban Extensions (SUEs) around Rugby have all experienced delivery challenges.
- 2.2.5 There is also an ongoing question as to whether Houlton and South West Rugby will be able to deliver any affordable housing. In light of the acute affordable housing needs explored above, it is appropriate that the Council consider allocating smaller, more deliverable sites which are capable of coming forward without experiencing significant infrastructure constraints. We contend that Land East of Kilsby Lane is such a Site.
- 2.2.6 Land East of Kilsby Lane also has the benefit of being a small/medium size Site well-related both visually and functionally to the Rugby Urban Area. Whilst recognising that the spatial strategy should be balanced, a significant amount of growth has been apportioned away from Rugby through the RBLP despite Rugby’s primacy in the settlement hierarchy. Therefore, growth has been cascaded down to what are demonstrably less sustainable locations which is not consistent with the need to secure sustainable patterns of development. The Regulation 19 Sustainability Appraisal by AECOM acknowledges this issue, stating that of the sites around Hillmorton (including Site 40):
- “The key issue with these sites relates to their position at the northern extent of the Rainsbrook Valley, which is now proposed to be designated as an area of landscape sensitivity (as discussed). **However, otherwise these sites perform reasonably well, particularly in transport and accessibility terms compared to other sites discussed below at lower order settlements.**” [Emphasis Added]
- 2.2.7 Notwithstanding the “landscape sensitivity” matter, which is discussed further below, this statement in the SA is an admission that the RBLP has prioritised growth in less sustainable locations. Whilst it is recognised that not all growth could be or should be directed to Rugby, the Land East of Kilsby Lane is a highly sustainable and deliverable site which has been omitted from the RBLP with inadequate justification or explanation.

Supply Buffer

2.2.8 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%;
- 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; and
- Because of the spatial characteristics of the Borough, delivery will inevitably be weighted towards Rugby and there are only so many homes that can be sold and therefore built within any particular area at any particular time (market absorption). Given that the aforementioned SUEs are all concentrated around the Town of Rugby, we would suggest that this, too, points toward the need for a higher buffer.

Spatial Strategy (Changes Requested)

2.2.9 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;
- Increase the supply-side housing buffer above 8.5% (to a materially higher figure) of between 15% and 20%; and
- Reinstate the draft allocation of Site 40 (East of Kilsby Lane) given its highly sustainable location

3. Land East Of Kilsby Lane, Hillmorton, Rugby

3.1 Introduction

3.1.1 As set out above, Cliffe Investments Limited is promoting Land East of Kilsby Lane, Hillmorton for residential 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 was previously draft allocated for 125 units under the previous iteration of the RBLP for 125 homes (Site ID 40). The Site's allocation has since been deleted.

3.2 Site-Specific Representations

3.2.1 As set out above, paragraph 5.4.18 of the Regulation 19 SA by AECOM acknowledges that the Site performs reasonably well, but its allocation has not been due to its location at the Rainsbrook Valley, which is proposed to be designated as an area of landscape sensitivity to the south of Rugby.

3.2.2 Notwithstanding the purported landscape sensitivity of the Rainsbrook Valley, it is well-established that not every parcel of land within a designated landscape character area will necessarily exhibit the qualities that underpin its sensitivity.

3.2.3 As a case in point, the Rugby Borough Council Landscape Sensitivity Assessments (March 2025 and updated November 2025) assesses the landscape and visual sensitivity of Land East of Kilsby Lane, amongst others. This finds that:

- The Site is partially enclosed by shrubs and trees;
- The Site immediately adjoins residential dwellings to the north;
- The Site has a semi-rural, edge of settlement character;
- There are no views to and from important landscape/cultural heritage features; and
- The Site has low overall landscape value and is relatively weak in its quality and condition

3.2.4 Considering all these factors together, the Landscape Sensitivity Assessment concludes that the site is of medium/low sensitivity.

3.2.5 Therefore, on the Council’s own evidence, the decision to delete the draft allocation due to its general location in an area landscape sensitivity cannot be justified, as the Site itself is clearly not reflective of those sensitivities.

4. Summary & Conclusion

4.0.1 These representations demonstrate that the Regulation 19 draft of the Rugby Borough Local Plan is not sound in its current form. The Plan’s housing requirement is limited to the minimum Local Housing Need figure, despite clear evidence of higher demographic need, significantly stronger recent delivery trends, acute affordable housing pressures, and the scale of economic growth envisaged through Policy S3. The Homes–Jobs Alignment Paper does not provide a credible basis for concluding that the proposed level of housing provision is sufficient to support the 287ha of employment land, nor does it assess alignment at the level of Rugby Borough. The Sustainability Appraisal also does not test reasonable alternatives to the housing requirement.

4.0.2 The shortened plan period to 2042 exacerbates these concerns, as it risks non-compliance with the NPPF requirement for a minimum 15-year horizon from adoption. Extending the plan period to 2045, as previously proposed, would ensure compliance.

4.0.3 The Plan’s reliance on a modest 8.5% supply-side buffer represents a weakening of the approach taken in the adopted Local Plan and is not justified given the persistent delivery challenges associated with Sustainable Urban Extensions and the Borough’s continued reliance on them. A more robust contingency in the region of 15–20% is necessary to ensure flexibility and resilience.

4.0.4 Turning to the site-specific evidence, the removal of the former draft allocation at Land East of Kilsby Lane (Site 40) cannot be justified. The Council’s own Landscape Sensitivity Assessments confirm that the Site is of medium/low sensitivity, visually contained, well-related to the existing urban edge, and free from significant landscape, heritage or visual constraints. Its omission on the basis of broader landscape sensitivity designations across the Rainsbrook Valley is not supported by the evidence and represents an over-generalised, non-proportionate approach.

4.0.5 Land East of Kilsby Lane performs strongly in sustainability terms, represents a small/medium-sized, deliverable opportunity adjacent to Rugby Town, and is capable of contributing to the Borough’s housing needs (particularly affordable housing).



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