

**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\***

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

*\*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.*

Title	Mrs	
First Name	Sarah	
Last Name	Alexander	
Job Title (where relevant)	Head of Planning and Enabling	
Organisation (where relevant)	Homes England	
Address Line 1	3 Arena Central	
Line 2	19 Holiday Stret	
Line 3	Birmingham	
Line 4		
Post Code	B1 1HH	
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	<input type="text"/>	Local Plan Policy	EN4	Policies Map	Rugby Town
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

### Policy EN4 Areas of Separation

Homes England supports the inclusion of an Area of Separation between Dunchurch and Rugby Town, to protect coalescence of these settlements. Policy EN4 states that development will only be permitted within these areas where there will be no adverse impact on the effectiveness of the area of separation.

However, Homes England has concerns about the extent of the Area of Separation shown on the Policies Map for Rugby Town, as it is shown to overlap land in its ownership that is proposed for development as part of the South West Rugby allocation.

A hybrid planning application (R25/0491) for residential-led mixed use development was validated on the 8 July 2025 and is currently being considered by Rugby Borough Council. The submitted Illustrative Masterplan and Site Location Plan provide details of the proposed development and the application red line boundary. However, the Proposals Map for Rugby Town clearly shows the Area of Separation overlapping the site at a number of locations, some of which are proposed for housing.

Therefore, Homes England requests that the Area of Separation shown on the Proposals Map is reviewed by Rugby Borough Council and amended in line with the planning application red line boundary to ensure that it does not overlap land proposed for development.

(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.

The Proposals Map for Rugby Town should be amended to reflect the application red line boundary as shown on the Site Location Plan and Illustrative Masterplan for application R25/0491. This is to ensure that the Area of Separation does not overlap land proposed for development as part of the South West Rugby allocation.

(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:

Homes England wishes to take part in the hearing sessions in relation to Policies S8, S9, EN4 and Site ID17 as a landowner at South West Rugby and forward funder of the infrastructure required to support the allocation.

**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.

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-notices>

**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\***

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

*\*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.*

Title	Mrs	
First Name	Sarah	
Last Name	Alexander	
Job Title (where relevant)	Head of Planning and Enabling	
Organisation (where relevant)	Homes England	
Address Line 1	3 Arena Central	
Line 2	19 Holiday Stret	
Line 3	Birmingham	
Line 4		
Post Code	B1 1HH	
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	<input type="text"/>	Local Plan Policy	S2	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

### Policy S2 Strategy for Homes

Homes England considers that the Proposed Submission Local Plan has been positively prepared and is effective and justified in meeting the needs of the Borough.

Homes England supports Rugby Borough Council’s strategy for delivering new homes to meet the future housing need within the plan period 2025-2042, and strongly supports the inclusion of South West Rugby as an allocation within Part B of the policy.

The allocation of South West Rugby will make a significant contribution to helping the Council meet its overall housing targets. The Council’s Whole Plan Trajectory indicates that the allocation will contribute towards the Councils five-year housing land supply targets, as well as meeting longer-term housing needs throughout the Plan period and beyond. Homes England supports the 3,505 homes identified to be delivered within the plan period.

The Council’s housing trajectory for the delivery of 1,600 homes on ‘Land East and West of Cawston Lane, North of Coventry Road and Land East of Alwyn Road’ from 2031-32 is considered appropriate.

The site was allocated under the adopted Local Plan (2011-2031) and several planning applications for residential development have been approved pursuant to the extant allocation.

There are also a number of planning applications awaiting determination, including a hybrid application for up to 1,600 homes, mixed-use centre, schools and associated infrastructure (Ref. R25/0491) on Homes England's land.

In addition, planning applications for strategic infrastructure to support the allocation have either been approved or are awaiting determination, including the Homestead Link Road, Cawston Lane improvements and the Community Spine Road, and a Primary Substation.

It is, therefore, considered that the inclusion of South West Rugby as an allocation within Policy S2 of the new Local Plan is entirely appropriate.

(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.

N/A

(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 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.

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-notices>

**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\***

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

*\*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.*

Title	Mrs	
First Name	Sarah	
Last Name	Alexander	
Job Title (where relevant)	Head of Planning and Enabling	
Organisation (where relevant)	Homes England	
Address Line 1	3 Arena Central	
Line 2	19 Holiday Stret	
Line 3	Birmingham	
Line 4		
Post Code	B1 1HH	
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	<input type="text"/>	Local Plan Policy	<input type="text" value="S6"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text" value="X"/>	No	<input type="text"/>
(3) complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

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.

### Policy S6 Residential Allocations

A number of new residential allocations have been added into the policy that are focused on Rugby town which, including existing commitments, will accommodate at least 75% of new housing 2025-2042.

Homes England considers that these sites could potentially benefit from highways and active travel mitigation schemes listed in Appendix K of the South West Rugby Masterplan SPD, which the developers at South West Rugby are contributing towards (or in some cases paying in full).

The proposed allocations should be assessed by Rugby Borough Council and Warwickshire County Council to determine the likely mitigation that each would require to support the allocation of the sites. Following assessment, should any of the sites benefit from the mitigation schemes listed in Appendix K, it is expected that they will contribute towards the costs of those mitigation schemes on a proportionate and fair basis.

Homes England's view that new allocation schemes should be contributing towards the mitigation / new infrastructure where it is demonstrated that they

benefit from the said infrastructure, is consistent with and supported by Part B of Policy I4 'Infrastructure and Planning Obligations'.

(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.

N/A

(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 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.

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>

**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\***

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

*\*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.*

Title	Mrs	
First Name	Sarah	
Last Name	Alexander	
Job Title (where relevant)	Head of Planning and Enabling	
Organisation (where relevant)	Homes England	
Address Line 1	3 Arena Central	
Line 2	19 Holiday Stret	
Line 3	Birmingham	
Line 4		
Post Code	B1 1HH	
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	<input type="text"/>	Local Plan Policy	S8	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

### Policy S8 South West Rugby

Homes England strongly supports the allocation of South West Rugby under Policy S8, and considers that its inclusion assists in achieving a positively prepared, effective and justified Local Plan that meets the needs of the Borough and contributes towards sustainable development.

The allocation will deliver a new neighbourhood that will contribute significantly towards the Borough’s overall housing needs, as well as providing a employment, community facilities, schools and strategic infrastructure to support the local economy. The 4,000 homes included for the allocation is supported.

The allocation will make a significant contribution to helping the Council meet its overall housing targets. The Council’s Whole Plan Trajectory indicates that the allocation will contribute towards the Councils five-year housing land supply targets, as well as meeting longer-term housing needs throughout the Plan period and beyond. Homes England supports the 3,505 homes identified to be delivered on the allocation within the plan period.

The Council's housing trajectory for the delivery of 1,600 homes on 'Land East and West of Cawston Lane, North of Coventry Road and Land East of Alwyn Road' from 2031-32 is considered appropriate.

Homes England is part of a consortium with Catesby Estates and Taylor Wimpey who are working collaboratively to bring forward comprehensive development at South West Rugby.

The site was allocated under the adopted Local Plan (2011-2031) and several planning applications for residential development have been approved pursuant to the extant allocation.

There are also a number of planning applications awaiting determination, including a hybrid application for up to 1,600 homes, mixed-use centre, schools and associated infrastructure (Ref. R25/0491) on Homes England's land.

In addition, the following planning applications for strategic infrastructure to support the allocation have been submitted to Rugby Borough Council:

- Full application for the demolition of existing buildings, alterations to Cawston Lane and formation of a single carriageway road to form the Community Spine Road (Ref. R24/0733), currently awaiting determination;
- Full application for the Homestead Link Road (Ref. R22/0928), permission granted 18 February 2025; and
- Full application for a Primary Substation (Ref. R25/0360), permission granted 9 October 2025.

Homes England is committed to delivering sustainable and high-quality development in accordance with the requirements of the policy, within the submitted and future planning applications on land within its ownership.

There are concerns, however, in relation to the proposed reduction in developable area for the safeguarded land (Site ID17) which forms part of the South West Rugby allocation. The Council should consider the implications of allocating land previously safeguarded for development as a country park, on the funding and delivery of the strategic infrastructure required under Policy S9, and listed in Appendix K of the South West Rugby Masterplan SPD.

(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.

N/A

(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:

Homes England wishes to take part in the hearing sessions in relation to Policies S8, S9, EN4 and Site ID17 as a landowner at South West Rugby and forward funder of the infrastructure required to support the allocation.

**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.

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>

**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\***

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

*\*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.*

Title	Mrs	
First Name	Sarah	
Last Name	Alexander	
Job Title (where relevant)	Head of Planning and Enabling	
Organisation (where relevant)	Homes England	
Address Line 1	3 Arena Central	
Line 2	19 Holiday Stret	
Line 3	Birmingham	
Line 4		
Post Code	B1 1HH	
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	<input type="text"/>	Local Plan Policy	S9 <input type="text"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

### Policy S9 South West Rugby Spine Road Network

Homes England strongly supports Policy S9 and delivery of the spine road network to support development of the South West Rugby allocation.

Planning permission was granted on the 18 February 2025 for the Homestead Link Road. Cawston Lane and the Community Spine Road, and the Sustainable Transport Corridor are subject to separate planning applications that are awaiting determination by Rugby Borough Council. Homes England and the other consortium members are financially contributing towards delivery of this strategic infrastructure.

It should, however, be noted that reducing the developable area of Site ID17 may have implications for delivery and funding of the Potsford Dam Link.

(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.

N/A

(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:

Homes England wishes to take part in the hearing sessions in relation to Policies S8, S9, EN4 and Site ID17 as a landowner at South West Rugby and forward funder of the infrastructure required to support the allocation.

**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.

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>

**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\***

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

*\*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.*

Title	Mrs	
First Name	Sarah	
Last Name	Alexander	
Job Title (where relevant)	Head of Planning and Enabling	
Organisation (where relevant)	Homes England	
Address Line 1	3 Arena Central	
Line 2	19 Holiday Stret	
Line 3	Birmingham	
Line 4		
Post Code	B1 1HH	
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	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	17				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

**Site ID17: South West Rugby Employment Phase 2**

The proposed allocation 'South West Rugby Employment Phase 2' was previously designated as safeguarded land under the adopted Local Plan to meet Rugby's future development needs. The Preferred Options plan proposed the site as an allocation for 130,000m<sup>2</sup> of employment floorspace and 8.6ha publicly accessible park alongside Cawston Spinney to provide a buffer between the woodland and new development.

Site ID17 is included in the Proposed Submission Local Plan as an allocation for 60,000m<sup>2</sup> employment floorspace and a wooded circa 23ha publicly accessible country park.

Homes England considers that the quantum of employment on the site is a matter for Rugby Borough Council. However, it is concerned with the remainder of the site being proposed as public open space rather than remaining as safeguarded land. This approach effectively sterilises the remainder of the land from any future development potential.

The site was included within Rugby Borough Council's Design Code SPD (July 2025) as safeguarded land, where it was considered for two possible scenarios for residential and employment development.

The Landscape Sensitivity Study 2026 has assessed these scenarios and regards the northern part of the site as having high sensitivity to commercial development, but medium sensitivity to mixed use or residential development concluding that mixed-use residential development is generally compatible with careful design and mitigation. Much of allocation proposed for development, including land around the ancient woodland is assessed as having medium sensitivity to mixed-use residential development.

Furthermore, the Rugby Ecological Constraints Assessment October 2025 states that the proposed employment development site ID17 has medium ecological constraints and that the site has potential to be taken forward for development subject to demonstrating there would be no adverse effects through sensitive site design and adoptions of mitigation measures. Full mitigation measures would be required to protect the ancient woodland to the northern boundary of the site.

Whilst the protection of Cawston Spinney is agreed to be necessary and appropriate, the minimum buffer recommended by the standing advice is 15m. Therefore, it is not considered that such a substantial buffer is between development and Cawston Spinney is required. The creation of a wooded publicly accessible country park including east-west pedestrian linkages has potential to introduce substantial financial delivery and operational commitments. It is unclear how this would be achieved and is assumed that the financial implications have been considered by Rugby Borough Council.

Homes England's understanding is that the consortium sites within the SUE are over providing public open space and, therefore, a country park of this size is not required. Therefore, the evidence for its inclusion is unclear.

Reducing the overall developable area of the allocation has direct implications regarding contributions and deliverability of strategic infrastructure to be delivered within the allocation. The cost of power to be delivered by the Primary Substation will increase proportionately by a third for the consortium members if this land is sterilised from future development. There may also be implications for delivery of the Potsford Dam Link required by Policy S9.

Homes England, therefore, suggests that there may be scope to consider a broader range of uses on parts of the site that do not impact negatively on Cawston Spinney thereby enabling a more balanced use of land. Provision should be made for alternate uses that may be compatible, such as small business units, community uses or housing, if carefully designed to ensure protection of Cawston Spinney.

For the reasons set out above, Homes England requests that the 23ha proposed as public open space is reduced in line with the proposed allocation in the Preferred Options, and the land safeguarded for housing or other uses to support delivery of the South West Rugby allocation and future development needs of the Borough.

(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.

To help make the plan sound, the 23ha of public open space proposed for Site ID17 should be reduced in line with the proposed allocation in the Preferred Options, and the land safeguarded for housing or other uses to support delivery of the South West Rugby allocation and future development needs of the Borough.

(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:

Homes England wishes to take part in the hearing sessions in relation to Policies S8, S9, EN4 and Site ID17 as a landowner at South West Rugby and forward funder of the infrastructure required to support the allocation.

**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.

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-notices>