

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*

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	Mr	Miss
First Name	Stuart	Victoria
Last Name	Mitchell	Cutmore
Job Title (where relevant)		Senior Associate
Organisation (where relevant)		Sworders
Address Line 1		The Gatehouse
Line 2		Hadham Hall
Line 3		Little Hadham
Line 4		Hertfordshire
Post Code		SG11 2EB
Telephone Number		
E-mail Address (where relevant)		Victoria.Cutmore@sworders.com

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	S3 Strategy for employment land	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 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.

Strategy for Employment Land

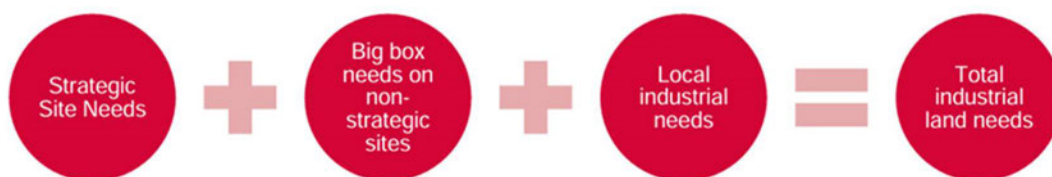
We do not consider that the Plan makes sufficient provision for smaller units for SMEs, as identified within the 'Local Industrial Needs Position (sq.m)– Including 5-year margin' in the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper (November 2024), as detailed below. This approach is also contrary paragraph 85 of the NPPF, which states:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.” [Our emphasis].

The Plan fails to account for local business needs. Table 3.4 within the 'Local Industrial Needs Position (sq.m)– Including 5-year margin' in the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper (November 2024) (2024 Alignment Paper) identifies a need for 125,500m2 of 'local' industrial need in Rugby between 2021-2045, being all industrial uses (E(g)(iii), B2 and B8) for units smaller than 9,000m2.

The Coventry & Warwickshire Employment Needs Addendum to the Coventry & Warwickshire Alignment Paper (November 2025) (2025 Alignment Paper Addendum) provides an updated total industrial need at Table 2.5 (updating Table 3.9 of the 2024 Alignment Paper). Whilst this purports to include local industrial need, this paper does not separate out the local industrial need as did the 2024 Alignment Paper. Therefore, it is difficult to understand the actual updated need and whether the Plan makes sufficient provision.

The 2024 Alignment Paper clearly identifies local industrial needs as a distinct category in the calculation of total industrial needs, as set out in the below figure taken from paragraph 3.1 of the same:



In contrast, the Development Needs Topic Paper (2025) sets out only a gross need for strategic sites and non-strategic sites. The SA at paragraph 5.2.12 makes a distinction between:

- *“The need for industrial land on smaller sites - comprising land within use classes E(g)(iii) (industrial processes which can be carried out in a residential area without detriment to amenity), B2 (general industrial) and B8 (storage and distribution) which is delivered on sites of less than 25 hectares in area... The Alignment Paper calls industrial need on smaller sites “non-strategic” site need. To be clear, this category of need includes a need for large units that are built on smaller sites.*
- *Need for industrial land on larger sites – this comprises floorspace for B2, B8 and classes E(g)(iii) uses that is constructed on sites of 25ha or more, which can be described as “strategic sites”.” [Our emphasis].*

When considered against the 2024 Topic Paper and particularly figure 3.1, we question why the 2025 Topic Paper and the SA do not acknowledge nor consider the local industrial needs. We consider this to be a serious oversight, whereby the Plan cannot be demonstrated to have been positively prepared in compliance with paragraph 36(a) of the NPPF, nor does it comply with national policy contrary to paragraph 36(d) in its failure to consider local business needs.

Paragraph 1.25 of the Plan states:

“Delivery in recent years has skewed towards large units with fewer smaller units for SMEs. To address this, some site allocations under Policy S7 require smaller units.”

Despite the confirmed need in the 2024 Alignment Paper, the Plan proposes 4,000sqm of space (in smaller units up to 1,500sqm) at Coton Park (Site 64) and, provision for

7,500sqm of floorspace in small to medium size buildings on Land at Walsgrave Hill (Site 121), with unit sizes ranging from 60sqm up to 1,500sqm.

This totals 11,500sqm, which represents less than 10% of the identified need in the 2024 Alignment Paper.

Paragraph 3.47 of the Development Needs Topic Paper (December 2025) contends that there is no clear basis to separate 'local' and 'strategic' need in Local Plan policy.

Paragraph 3.48 of the same states:

"The WMSESS needed to identify a minimum 'strategic' site size to define its scope. However, there is in practice nothing magic about the 25ha threshold that was set, and therefore there is no clear basis for enshrining this in policy and creating two different local plan requirement figures for employment land based exclusively on the total area of the site floorspace is built on. This would also create significant implementation and monitoring challenges given the inability of the council through development management to control the precise sizes of units and sites."

As referenced above, local industrial need defined in the November 2024 Alignment Paper as being all industrial uses (E(g)(iii), B2 and B8) for units smaller than 9,000m². The Plan fails to consider and address the requirements for the identified need for smaller units within the Borough. As such, it cannot be demonstrated that the Plan has been positively prepared in accordance with Paragraph 36(a) of the Local Plan, neither is it justified, given the presence of suitable sites which have not been proposed for allocation which could assist in meeting this need. Such alternative sites are discussed in our comments on Policy S7.

Local Plan Period

Part A of Policy S3 establishes the Plan period 2025-2042. This has been reduced from 2024-2045 in Policy S2 in the Regulation 18 Preferred Options Local Plan in order to reduce the number of dwellings that need to be planned for by the Local Plan. Paragraph 22 in the NPPF is clear that **"Strategic policies should look ahead over a *minimum 15-year period from adoption*"**.

Rugby's current Local Development Scheme (LDS) sets out that Rugby expects to submit the Plan for examination in June 2026 with adoption scheduled for June 2027. Assuming strict accordance with this timetable the Plan would only look ahead for 14.5 years from adoption, taking into account the fact that local housing need is calculated for a full annum. Moreover, it is considered that the timetable itself is ambitious and could be subject to change. The LDS assumes that the Local Plan Examination and post-examination to adoption will only last 12 months. Government guidance contained in the 'Local plans: taking part in examinations' sets out that **"Most examinations take around a year to a year and a half, from start to end."** not including the time after the examination process has closed for the Council to agree to adopt the Plan. It should also be emphasised that the Chief Officer for Growth and Investment noted at the Scrutiny Committee on 21 January 2025 that the Inspectorate had written to the Council to

express that a number of Local Planning Authorities are planning to submit Local Plans for examination before the December 2026 deadline which could result in capacity issues for examiners and delays to the examination process. The revocation of the postponement to Rugby's local elections in May could likewise delay the submission of the Draft Local Plan for examination.

It is considered that this is relevant to the strategy for employment land, as any increase to the Plan period would generate a need to consider whether additional employment land is required to meet demand during this time. To ensure that the Plan provides a minimum of 15 years upon adoption, the Plan period should be extended to 2043/2044, with consideration given as to whether additional employment land should be allocated in this Plan to ensure identified needs are met in full.

This is acknowledged in paragraph 2.6 of the Coventry & Warwickshire Employment Needs Addendum to the Coventry & Warwickshire Alignment Paper (November 2025), which states at paragraph 2.6 that *'this reduces the years' supply position in Area 7 to 14.5 years.'*

The SA concludes at paragraph 7.2.4 that:

"The weak performance of the high growth scenarios also weakens the case for extending the plan period and supports the council's view that decisions about longer term strategy for the mid 2040s and beyond are better taken by the successor unitary authority in the context of a strategic development strategy, the new plan-making system and new national policy."

We disagree with this conclusion, being contrary to paragraph 22 of the NPPF, whereby deference to a future authority or as a result of a future possibility is not recognised as an exception to this requirement. The Plan is therefore not sound pursuant to Paragraph 36(d).

(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 ensure the Plan is sound, additional sites should be allocated within the plan to meet the identified need for industrial units of uses (E(g)(iii), B2 and B8) smaller than 9,000m² as identified in the WMSESS. This would ensure the Plan has been positively prepared in accordance with para 36(a) of the NPPF.

The Plan period should be extended from 2025-2042 to 2025-2043/44 as a minimum to ensure that this is for a minimum of 15 years on adoption, in order for it to be sound in accordance with paragraphs 36(a) and (d). This would necessitate allocating additional

sites under Policy S7 to ensure the Local Plan allocates sufficient employment space to meet the identified need.

(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.

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To set out the requirements for modifications detailed above to address soundness issues.

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.

AI has not been used for any purpose in respect of these representations.

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>

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S7 Employment allocations	Policies Map	x <input type="text"/>
Site ID	<input type="text"/>				

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Suitability of Site Allocations

Policy S7 Employment Allocations identifies five sites for employment allocation. S7 B states *“The development of the sites shall accord with the development principles set out in the development site allocations annex and with other policies in this plan”*. Other policies in the plan include Policy S5 Countryside protection. In particular S5B, which states that in areas within the Green Belt **“national Green Belt policy will be applied in these areas”**. 62% of the allocated employment land would be removed from the Green Belt. A further 37 hectares of land will need to be removed from the Green Belt in order to produce logical and defensible Green Belt boundaries.

Site 121 – Walsgrave Hill

The Proposed Submission Draft introduces a new employment allocation at Walsgrave Hill Site 121, providing circa 290,000sqm of employment land within the Green Belt. This is the largest allocation. Whilst this would be located adjacent to Ansty Park industrial area and is in close proximity to the M6 Junction 2 with the M69 and A46 the

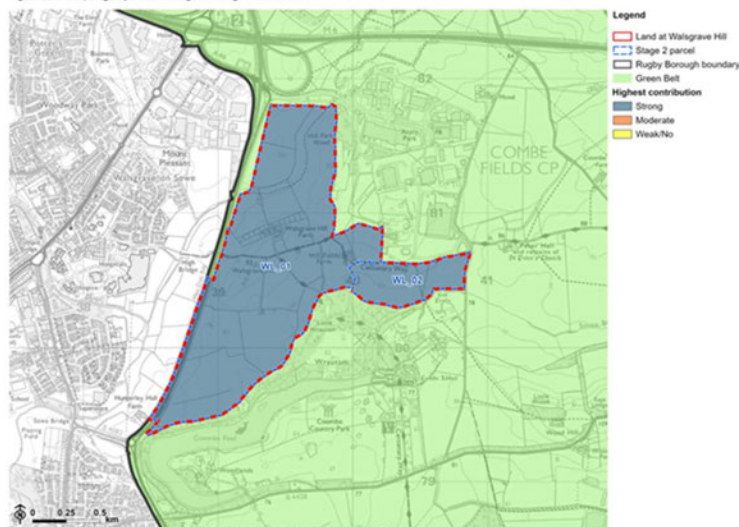
Sustainability Appraisal confirms that this area “*is not currently well-connected in transport terms*” and will require a new strategic junction onto the A46. This employment allocation would result in the removal of a large area of Green Belt land which prevents the coalescence of Walsgrave Hill and Ansty Park and has a strong contribution to Purpose A (preventing the sprawl of large built-up areas) and a strong contribution to purpose C. The Green Belt Assessment (2025) confirms the Walsgrave Hill site as mostly not grey belt. Only 23 ha being considered suitable for grey belt. The site is also impacted by Hill Park Wood and Coombe Abbey Local Wildlife Sites.

As stated above National policy contained within the National Planning Policy Framework (NPPF) December 2024 sets out the policy context for Green Belt release at Paragraphs 145 to 148. Paragraph 145 advises - “*Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.*”

There are no fully evidenced and justified exceptional circumstances to support the removal of 141+hectares of Green Belt land at Site 121 Walsgrave Hill. Walsgrave Hill is an omission site not previously proposed for allocation and there are other more suitable sites for employment allocations that would not result in the removal of Green Belt and that are available and deliverable for employment use.

The Green Belt Contribution Study Stage 2: Site Contributions Assessments December 2025 assessed the Green Belt contribution of site 121 and divided the site in two parcels. The outcome of the assessment was that the larger parcel WL-01 has a strong contribution to purpose A and would not constitute grey belt; see extract below. Given Site 121 is an omission site and the previous Reg 18 Preferred Options provided sufficient employment land to meet local need, there is no evidence to suggest that the removal of Site 121 Walsgrave Hill from the Green Belt would meet the requirements of para 145 of the NPPF of exceptional circumstances.

Figure 2.29: Site, Stage 2 parcels and highest rating for contribution



The Walsgrave Hill allocation Site 121 is on the boundary with Coventry City Council and its location would result in a proportion of the economic benefits being drawn away from Rugby. Jobs created may be taken largely by Coventry residents and Coventry based firms would benefit from supply chain and service opportunities associated with the development at the expense of Rugby.

Paragraph 146 of the NPPF states that Exceptional circumstances include instances where an authority cannot meet its identified need for homes, commercial or other development through other means. Para 147 states that *the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.*

Consideration of alternative suitable sites to Walsgrave Hill - Site 121

There are alternative sites, such as Site 21 Boots Farm, which have been assessed within the Green Belt Contribution Study Strategic Assessment prepared by LUC (October 2025) as potentially being suitable for definition as grey belt land. The figure below is a screenshot from Figure 4.7 in the assessment, showing Boots Farm in the centre. The interspersed blue colouring denotes 'potential grey belt land potentially overlapping with footnote 7 designations'. We can confirm that there is no footnote 7 designations affecting Site 21 or the land immediately surrounding, which would prevent it from meeting the criteria for being considered as grey belt.



Source: Screenshot from Figure 4.7: Areas suitable for definition as grey belt in the Green Belt Contribution Study Strategic Assessment prepared by LUC (October 2025)

Whilst this is the overall conclusion in relation to the site, we would highlight that the site is assessed as making 'weak/no' contribution to Purposes A - check the unrestricted sprawl of large built up areas, B - prevent neighbouring towns merging into one another and D - Preserve the setting and special character of historic towns.

As such, it is considered that Site 21 should be included as an allocation due to its grey belt status and, to assist in addressing the identified need for smaller units for SMEs. We set out our comments on the Site's suitability with reference to the Stage 2 HELAA assessment and in comparison with other sites favoured for allocation. For example, Site 21 was within the top 50% of all sites assessed in terms of overall accessibility, ranked 57 out of the 125 sites assessed, in comparison only Site 64 (Coton Park, East) scoring more favourably.

In contrast, the Stage 2 Site Assessment for Walgrave Hill Site 121 states:

"In addition, their initial review considers levels of physical highway mitigation required in order to ensure that impact on the strategic road network from development on the site is addressed, ranging from low, medium to high. The current level of concern for this site is High."

Further, Site 121 is ranked 70 out of 125 sites in terms of overall accessibility, noted as having high ecological constraints owing to the presence of a SSSI, ancient woodland and Local Wildlife Site adjacent and as having a medium overall landscape sensitivity. Heritage is also identified as a constraint, with a significant band of flood zone 2/3 crossing the site. It is also Grade 2 agricultural land, which represents the best and most versatile.

Given the above, and the strong contribution the site makes to the Green Belt purposes A and C, and moderate contribution to purpose B, we do not consider that exceptional circumstances exist for its release from the Green Belt. Therefore, in order to be found sound in accordance with paragraph 36 of the NPPF, Site 121 should be removed from Plan, with more suitable alternative sites allocated instead.

Site 21 was discounted at the Stage 2 HELAA, described as being isolated and in the Green Belt. We would again reiterate the site's strong score in relation to overall accessibility in the Stage 2 HELAA, and that since this assessment was undertaken, Green Belt Assessments undertaken show the site as meeting the criteria for being considered as grey belt. As such, it is considered that this site should be reconsidered as a suitable location to provide much-needed smaller units for SMEs.

The Stage 2 HELAA considers that Site 21 could yield 60,000sqm, which would make a considerable contribution towards the identified unmet need for smaller units. It is noted at this stage that, additional land is available surrounding the site immediately to the north and east, which could provide a considerably larger contribution to employment needs if required. This area is similarly within the area identified as potential grey belt

and could provide a significant contribution towards the needs of SMEs. An indicative plan of the additional land available is appended to this response, with Boots Farm itself outlined in red, and the potential additional land edged blue and yellow.

The draft Submission Local Plan is considered to be unsound on the grounds that alternative sites put forward through the Council's Call for Sites process have not been properly or openly assessed, despite being more suitable and easier to deliver than the sites that have been chosen for allocation. These alternative sites have fewer environmental and heritage constraints and better support sustainable development, yet they have been ruled out or not fully considered without clear reasons. By failing to fairly assess and compare all reasonable options, the Council has weakened its evidence base and cannot show that the Plan is the best or most appropriate strategy, as required by national policy.

According to the Sustainability Appraisal, the total proposed supply of employment floorspace to 2042 exceeds the total need to 2042. The Sustainability Appraisal acknowledges that the majority of land to the south of Symmetry Park in the vicinity of the junctions onto the strategic road network is being promoted for employment land.

After existing committed supply, the net need for strategic sites is 310,711sqm (89ha) and for non-strategic sites is for 219,171sqm (55ha) such that total net need is for 529,882sqm or 144ha. To omit the Walsgrave Hill Site and allocate alternative sites would be a more appropriate strategy that would not result in the release of unsuitable sites within the green belt.

Whilst the Sustainability Appraisal and Growth Scenarios look at the wider labour catchment and potential increase in commuting and considers the benefits of sites closer to Coventry and Hinckley, Site 21 has easy access to the A45 and A423, as well as the existing labour market in Rugby and SW Rugby expansion.

The Sustainability Appraisal considers omission sites 18 and 113 in place of Walsgrave Hill is a reasonable scenario to test, Scenario 4. However, sites 18 and 113 are within the Area of Separation proposed by Draft Policy EN4 and are located to the south side of the A45 and B4429 respectively.

Four scenarios were tested in the SA, and we do not consider based on the above that this provides a robust assessment of the reasonable alternatives.

Site 21 Boots Farm is demonstrated to be Grey Belt and is considered to be available, achievable and suitable for development. Rather than risk the plan being found unsound, we request that you replace Walsgrave Hill with smaller, more suitable sites such as Site 21 within the Submission Local Plan.

The Stage 2 HELAA for Site 21 makes reference to the potential for the Site to be a Neighbourhood Plan option. We note that Bourton and Draycote is not a Designated Neighbourhood Area. There is no certainty of a Neighbourhood Plan coming forward, and as discussed in these representations, there is a considerable, unmet need for smaller units in the local area which this Site could help to address.

The expansion of this existing employment site provides an opportunity to meet local business demands in an area with a considerable need. All existing units on the site are let, with very few vacant periods due to high demand in the area for smaller units for start-up, small and medium businesses. This local evidence of need, as well as that identified in the 2024 Alignment Paper as referenced above highlights the need for the Plan to allocate additional sites to ensure this need is met. As stated above, additional land totalling c.100ha to the north and east would also be available for a larger extension if required. The attached plan shows this indicative area.

In addition, further sites, including Site 25 – Land to the South of the A45 and Site 58 – Land to the North of the A45 have also been promoted throughout the Local Plan process and represent suitable locations for employment.

Site 58 – Land to the North of the A45 has been promoted throughout the Local Plan process. It is located immediately to the west of the existing employment area Dunchurch Trading Estate, a strategically important employment site under Policy ED1 of the adopted Local Plan. It is bordered to the south by the A45 and the A4071 to the west. To the north-east lies the area allocated as the South West Rugby SUE, for 5,000 new homes and associated infrastructure and services. The Tritax Symmetry development is also being constructed further east of the site. The Site would provide a logical extension to the existing neighbouring allocated employment site.

Site 25 – Land to the South of the A45 is similarly well located, with the northern boundary formed by the dual carriageway A45, the western boundary by Bernhard's Nursery, the southern boundary by Draycote Lane, and the eastern boundary by a dismantled railway line. Beyond the railway to the east is a golf club and further commercial development.

Whilst it is noted within the Stage 2 HELAA for Site 58 that accessibility will be improved by SW Rugby development, we consider this also applies to Site 25. Each site was accompanied by technical evidence in relation to access as part of the submission to the Call for Sites, confirming that there are three potential suitable access options into Site 25 to the south of the A45, off the A4071, with suitable access via the A4071 similarly possible for Site 58 to the north of the A45. This technical evidence was not taken into account as part of HELAA, despite being submitted in the Call for Sites which ran from October 2023 to February 2024. As such, it is considered that both sites have been unjustly overlooked, despite representing suitable locations for growth, particularly for the delivery of smaller units.

Both Sites 25 and 58 were assessed as making a strong contribution towards Purpose A - check the unrestricted sprawl of large built-up areas within the Green Belt within the Green Belt Contribution Study Strategic Assessment prepared by LUC (October 2025). Based on the methodology set out in paragraph 3.27, we disagree with this conclusion, given, as described above, both sites contain physical features in reasonable proximity that would restrict and contain development, being the surrounding highway network. It is also disputed that development would form an incongruous pattern in relation to the large built-up area. Site 58 – land to the north of the A45 is adjacent to the Dunchurch Trading Estate, which is an existing employment allocation. The development of this site would be entirely in keeping with the neighbouring uses, noting also the presence of the A45 to the south, the A4071 to the west and the A45 to the south.

Similarly, Site 25 – land to the south of the A45 is well contained, being bordered by the A45, a dismantled railway line, Draycote Lane and Bernhard’s Nursery.

As such it is considered that both sites do meet the criteria for being considered as grey belt and represent suitable locations for commercial development.

Site 64 – Coton Park East

Turning to Site 64 Coton Park East, this was allocated under adopted Local Plan Policy DS7 to provide 800 dwellings with 7.5ha of employment land. The existing Coton Park residential development adjoins the site to the south and west which includes a new primary school. The existing residents occupied their properties on the basis that the land to the east would be developed into a wider residential development with only a small section of employment to the north of the site adjacent to the M6. Coton Park East Masterplan Supplementary Planning Document was adopted by full council in December 2019 which was adopted to provide further guidance to ensure comprehensive delivery of all requirements of the Coton Park East allocation, including infrastructure phasing and delivery. The landowner is now seeking to bring forward the remainder of the site for employment land. As such 35.97 hectares of land is now reallocated for employment use. Whilst the site is adjacent to existing employment development at Coton Park, the re-allocated site lies immediately adjacent to residential development, Rugby Free Primary School and also within close proximity to the rural settlement of Newton, which has also been allocated residential development of 25 dwellings.

The proposed allocation of Site 64 to employment is unjustified making the draft plan unsound. The reallocation from residential use, where there is already an adopted masterplan, to employment is unsound as it undermines the principles of plan-led development, consistency and justified evidence based policy making. There is no clear evidence for this reallocation. An adopted masterplan represents a formally approved framework that has been subject to consultation, viability testing, infrastructure planning, and sustainability appraisal. Departing from this established position without clear, robust, and up-to-date evidence risks creating uncertainty for landowners,

developers, and the local community, and may prejudice investment decisions made in good faith reliance on the adopted strategy.

For this reason and the reasons outlined above we consider the employment allocations at Coton Park East and Walsgrave Hill are unjustified making the plan unsound and there are more appropriate, sustainable sites that are available and deliverable to meet the district's employment needs.

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

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We consider that exceptional circumstances have not been evidenced or justified for the removal of the proposed Walsgrave Hill allocation (Site 121) from the Green Belt to provide circa 290,000sqm of employment land. The approach is contrary to national policy and does not represent the appropriate strategy given reasonable alternatives, which have not been adequately considered in preparing the Plan.

In order for the Plan to be sound in accordance with paragraphs 36(b) and (d), this site should be removed as an allocation, or at the very least, significantly reduced, with alternative suitable sites allocated.

In addition, and notwithstanding the outcome with regards to the Walsgrave Hill (Site 121) allocation, additional sites should be allocated within the plan to meet the identified need for industrial units of uses (E(g)(iii), B2 and B8) smaller than 9,000sqm, as identified in the WMSESS. This would ensure the Plan has been positively prepared in accordance with para 36(a) of the NPPF.

(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.

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

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To set out the requirements for modifications detailed above to address soundness issues.

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Potential additional land surrounding Boots Farm, CV23 9QQ

