

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	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="National Highways"/>	<input type="text"/>
Address Line 1	<input type="text" value="Three SnowHill"/>	<input type="text"/>
Line 2	<input type="text" value="Snow Hill Queensway"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text" value="Birmingham"/>	<input type="text"/>
Post Code	<input type="text" value="B4 6GA"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>

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?

Paragraph

Policy

S2

Policies Map

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

x

No

(2) is Sound

Yes

x

No

(3) complies with the
Duty to co-operate

Yes

x

No

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

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

The Regulation 19 Local Plan reflects a reduction in the total number of houses proposed for construction over the plan period. Specifically, the number of new dwellings has decreased from 12,978, as outlined in the Preferred Options Consultation, to 10,812 in the current plan. Additionally, the plan period has been adjusted, shifting from 2024–2045 to 2025–2042. We note these changes and have no further comments to make.

(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.

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	S3	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"/>

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Chapter S3 'Strategy for Employment Land' has undergone several revisions in the latest plan. Most notably, the allocation for office floorspace (E(g)(i) and (ii)) has been reduced from 22,013 square meters to 19,761 square meters. In contrast, the designated land uses for B2 and B8 have increased slightly, now totalling 1,034,000 square meters, up from 1,026,546 square meters in the preferred option consultation. Overall, the total provision for employment land has decreased to 1,034,243 square meters, a reduction from the earlier figure of 1,231,987 square meters. We note these changes and have no further comments to make.

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	S6	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

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We note that there has been an overall reduction in the number of new dwellings since the previous preferred options consultation as discussed above. There have been several sites that have either been removed from the plan, or where the proposed number of houses has been reduced.

At this stage we have no immediate concerns regarding the housing allocations set out in the Regulation 19 Local Plan. We are liaising with the local planning authority to resolve matters including the Strategic Transport Assessment and Infrastructure Delivery Plan.

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Paragraph	<input type="text"/>	Policy	S7	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

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We note that in the preferred options consultation the total employment allocation totalled 945,000 square metres and this has reduced to 865,000 square metres in the proposed submission version of the Local Plan.

At this stage we have no immediate concerns regarding the employment allocations set out in the Regulation 19 Local Plan. We are liaising with the local planning authority to resolve matters including the Strategic Transport Assessment and Infrastructure Delivery Plan.

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Paragraph Policy **S8 & S9** Policies Map

Site ID

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We note that no changes have been made to chapters S8 and S9 between the preferred options consultation and the proposed submission consultation.

We understand that Phase 1 of this development has been constructed and National Highways are in discussion with the developer regarding Phase 2. We further note that the development quantum at this site has decreased from 130,000m2 to 60,000m2. In our previous response we requested further information regarding the Southwest Rugby Spine Road. We note that the A45/M45 interchange has already undergone works to provide this link road, but the link road has not yet been completed, although this is planned to be delivered alongside future phases of the allocation.

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Proposed Submission Regulation 19
Consultation,
Development Strategy Team,
Town Hall,
Evreux Way,
Rugby,
CV21 2RR
Via Email: localplan@rugby.gov.uk

National Highways
Three Snow Hill,
Snow Hill Queensway
Birmingham
B4 6GA

13 March 2026

Dear Sir/Madam,

Rugby Borough Local Plan – Regulation 19 Consultation

National Highways welcomes the opportunity to provide comments on the Proposed Submission Version of the Local Plan (Regulation 19) prepared for Rugby Borough Council, which is expected to cover the plan period from 2025 – 2042. Please note that this letter has been produced alongside the requested Representation Form.

National Highways has been appointed by the Secretary of State for Transport as a Strategic Highways Company under the provisions of the Infrastructure Act 2015. It serves as the highway authority, traffic authority, and street authority for the Strategic Road Network (SRN), with responsibility for ensuring its safe and efficient operation while supporting national economic growth as a key delivery partner.

In relation to this consultation, National Highways' primary concern is the safe and efficient operation of the Strategic Road Network (SRN), particularly the M1, M6, M69, A5, A45, and M45, which pass through the Local Plan boundary.

In responding to Local Plan consultations, we have regard to the Department for Transport's (DfT) revised Circular 01/2022 – Strategic Road Network and the Delivery of Sustainable Development (the Circular), which outlines how interactions with the Strategic Road Network should be considered in the preparation of Local Plans. Paragraph 28 of the Circular states that:

The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The

company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.

In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

Previous Consultations

We provided a response to the Preferred Options Consultation in May 2025. In this response we strongly recommended that a Strategic Transport Assessment be prepared, and we are currently working with the local authority to review and agree this document.

In our response we identified sites which were of significant scale or located in proximity to SRN junctions. We requested that each of these sites be supported by detailed, site-specific transport assessments prepared in accordance with the DfT Circular 01/2022. We stated that these should assess both the direct and cumulative impacts on the SRN and should identify necessary mitigation measures. For employment sites we stated that we would expect comprehensive transport modelling and clearly phased infrastructure delivery proposals to be provided for our review. These should be accompanied by Freight routing strategies, and any associated highway mitigation must be developed in collaboration with National Highways. We requested early and proactive engagement as sites are brought forward.

We further requested information and confirmation regarding the potential impacts of the Southwest Rugby Spine Road, the assessment scenarios and how the cumulative impact of the spine road will have on the SRN will be assessed.

Regulation 19 Consultation

S2 Strategy for Homes

The Regulation 19 Local Plan reflects a reduction in the total number of houses proposed for construction over the plan period. Specifically, the number of new dwellings has decreased from 12,978, as outlined in the Preferred Options Consultation, to 10,812 in the current plan. Additionally, the plan period has been adjusted, shifting from 2024–2045 to 2025–2042. We note these changes and have no further comments to make.

S3 Strategy for Employment Land

Chapter S3 'Strategy for Employment Land' has undergone several revisions in the latest plan. Most notably, the allocation for office floorspace (E(g)(i) and (ii)) has been reduced from 22,013 square meters to 19,761 square meters. In contrast, the designated land uses for B2 and B8 have increased slightly, now totalling 1,034,000 square meters, up from 1,026,546 square meters in the preferred option consultation.

Overall, the total provision for employment land has decreased to 1,034,243 square meters, a reduction from the earlier figure of 1,231,987 square meters. We note these changes and have no further comments to make.

S6 Residential Allocations

We note that there has been an overall reduction in the number of new dwellings since the previous preferred options consultation as discussed above. There have been several sites that have either been removed from the plan, or where the proposed number of houses has been reduced.

The table below identifies the key residential sites that are proposing 100 dwellings or more, and/or are located within proximity to the SRN or have direct access to the SRN.

Ref	Name	No. of Dwellings	Likely SRN impacted	Comments
59	Newton Manor Lane, Brownsover	285	M6 J1	Remains from previous consultation. Quantum of development reduced by 45 dwellings.
358	Land at Coventry Road, Wolvey	60	M69 J1	Remains from previous consultation. Quantum of development reduced by 440 dwellings.
316	Land at Long Lawford	400	A45, A4071 & B4453	Remains as is from previous consultation.
338	Land south of Crick Road, Houlton	250	A5 Halfway House	Remains as is from previous consultation.
353	Town Hall, Rugby	114	M6 J1	Added since previous consultation and over 100 dwelling threshold.
283	Rugby Central Shopping Centre	200	M6 J1	Added since previous consultation and over 100 dwelling threshold.
253	Lawford Fields Farm, Long Lawford	250	M6 J1	Added since previous consultation and over 100 dwelling threshold.
348	The Croft, Stretton-on-Dunsmore	70	A45	Added since previous consultation but added due to proximity to A45.
136	North of Warwick Road, Wolston	80	A45	Added since previous consultation but added due to proximity to A45.
334	Land off Barby Lane, Hillmorton	380	A5 Halfway House	Removed since previous consultation
134	Land north of Plott Lane, Stretton	125	A45 School Lane	Removed since previous consultation
40	East of Kilsby Lane, Hillmorton	125	A5 Halfway House	Removed since previous consultation.
341	Land south of Coventry Road, Dunchurch	180	M45 J1	Removed since previous consultation.

S7 Employment Allocations

We note that in the preferred options consultation the total employment allocation totalled 945,000 square metres and this has reduced to 865,000 square metres in the proposed submission version of the Local Plan.

Site 17, South West Rugby Employment Phase 2 has seen a reduction in floorspace from 130,000m² to circa 60,000m² from the preferred options consultation to the proposed submission. Land at Walgrave Hill (ref 121) which has a floorspace of 290,000m² has been added to the Regulation 19 Local Plan while Prologis Park West and Mountpark, Ryton-on-Dunsmore (c. 350,000m²) has been removed from the latest submission.

South West Rugby (Policy S8 / S9)

We note that no changes have been made to chapters S8 and S9 between the preferred options consultation and the proposed submission consultation.

We understand that Phase 1 of this development has been constructed and National Highways are in discussion with the developer regarding Phase 2. We further note that the development quantum at this site has decreased from 130,000m² to 60,000m². In our previous response we requested further information regarding the Southwest Rugby Spine Road. We note that the A45/M45 interchange has already undergone works to provide this link road, but the link road has not yet been completed, although this is planned to be delivered alongside future phases of the allocation.

Sustainability Appraisal

We have undertaken a high-level review of the Sustainability Appraisal which has been submitted alongside the local plan. We welcome the principles set out in the document which favour the delivery of sustainable development and sustainable transport options.

Next Steps

At this stage we have no immediate concerns regarding the housing or employment allocations set out in the Regulation 19 Local Plan. With regards to the technical evidence in support of the Local Plan, namely the Strategic Transport Assessment and Infrastructure Delivery Plan, we are liaising with the local planning authority to resolve matters as quickly as possible.

We welcome further engagement with the Local Authority as the plan progresses. Please do not hesitate to contact us should you require clarification or further discussion.

Yours sincerely,



From: [REDACTED]
Sent: 13 March 2026 10:40
To: Local Plan
Cc: [REDACTED]
Subject: Proposed Submission Consultation Rugby Borough Local Plan Regulation 19 Consultation - National Highway
Attachments: Rugby BC LP Reg 19 Consultatuon - NH Representation Form_March 2026.pdf; Rugby BC Local Plan Reg 19 Proposed Submission - NH Letter response 13 March 26 - docx.pdf
Categories: [REDACTED]

Good Morning,

Further to the above consultation, we have reviewed the proposed Regulation 19 Submission version Rugby Local Plan. We have provided our comments both in letter format as well as the Representation Form, please see attached.

Overall, we have no major concerns given the overall quantum of growth has reduced since the Preferred Options Consultation. As we are still in the process of reviewing the Strategic Transport Assessment / modelling outputs relating to local plan growth we have set this out in our response. We have also undertaken a high-level review of the Sustainability Appraisal and provided our comments.

I trust that you find this satisfactory.

Kind Regards
[REDACTED]

[REDACTED]

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk

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