Research & Analysis

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Rugby Local Plan Review
Response to Regulation 19 Consultation

Land at Ryton Fields Farm

Prepared by

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Established in 1991 | Employee Owned Trust

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1.0 INTRODUCTION

1.1 Rugby Borough Council is currently undertaking a Regulation 19 Consultation on the draft Local Plan, which commenced on 30th January and will run until 5pm 13th March 2026.

1.2 These representations have been prepared by DLP Planning Ltd on behalf of S & D Postlethwaite in response to Rugby Borough Council's Local Plan Review – Regulation 19 Consultation. The representations relate to the Land at Ryton Fields Farm site as outlined in the figure below. The Ryton Fields Farm site is suitable, available and achievable for an employment allocation of 22.8 ha, or a potential 63,000 sqm, of E(g)(i-iii), B2 and B8 floorspace. A summary of the deliverable floorspace at the site is below.

1.3 These representations demonstrate that the Draft Local Plan is not positively prepared or justified in relation to employment land provision. In particular, the Plan fails to provide sufficient flexibility to meet the needs of small and medium-sized enterprises (SMEs), concentrates employment allocations within a limited geographic area, and does not consistently prioritise Grey Belt land in accordance with national policy.

1.4 The Ryton Fields Farm site (Site Ref. 2) represents a deliverable, market-supported alternative allocation capable of addressing these deficiencies and assisting the Council in ensuring the Local Plan is sound.

Table 1: Summary of Deliverable Floorspace at Ryton Fields Farm

Site Area	Total Deliverable Site Floorspace	Floorspace Deliverable on Small-Medium Units (under 2,000 sqm)	Floorspace Deliverable on Medium Units (2,000 to 5,000 sqm)
22.8 ha	63,000 sqm	9,570 sqm	17,300 sqm

Figure 1: Approximate Location of Site

Source: [redacted]

1.5 These representations are made in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and therefore focus specifically on the legal compliance and soundness of the Draft Local Plan. In particular, the representations demonstrate that the current strategy fails the tests of soundness set out in Paragraph 36 of the National Planning Policy Framework (2024), namely that the Plan is not positively prepared, not justified by proportionate evidence, and not effective in delivering a balanced supply of employment land across the Borough.

1.6 Alongside this submission, a suite of supporting appendices are attached to evidence the fact that the site is deliverable, achievable, and available, as well as to address the Council's concerns at the site assessment stage. The appendices provide additional context to development including a planning history and delivery programming. The appendices which support the availability and deliverability of the site are as follows:

- **Appendix 1 – Executive Summary**
- **Appendix 2 – Bromwich Hardy Marketing Letter**
- **Appendix 3 – Holt Marketing Letter**
- **Appendix 4 – Deliverability and Programme Statement**
- **Appendix 5 – Land Availability Statement**
- **Appendix 6 – Planning History & Established Commercial Use Statement**
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- **Appendix 8 – Highways Deliverability Summary**

1.7 DLP Planning has previously promoted the Ryton Fields Farm site through the Call for Sites (Site Ref. 2) and both the Issues and Options and Preferred Options stages of the Regulation 18 Consultation. However, the decision made by the Council was to not allocate the land for economic development.

1.8 As per the requirements of the National Planning Policy Framework (NPPF) 2024, these representations address the issue of whether the Draft Local Plan and supporting evidence, including the Stage 2 Site Assessment (December 2025) are 'sound'. Where it is considered that the policies of the Regulation 19 Draft Plan are not sound, by failing to demonstrate one of the four 'tests of soundness' criteria, the reasons for this are explained and, if appropriate, modifications suggested.

2.0 NATIONAL POLICY CONTEXT

2.1 The National Planning Policy Framework (NPPF) provides the framework within which local plans should be created. The most up-to-date version of the NPPF was released in December 2024. Local Plans should align with the NPPF's principles and priorities including those of the presumption in favour of sustainable development and plan-making requirements.

2.2 Those policies that are relevant to the plan-making process and these representations in respect of the Rugby Local Plan Regulation 19 version are summarised below.

a) Presumption in Favour of Sustainable Development

2.3 Paragraph 7 of the NPPF outlines the overall purpose of the planning system as to contribute to the achievement of sustainable development, including the provision of commercial development in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without comprising the ability of future generations to meet their own needs.

2.4 At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision taking (Paragraph 11). For plan-making, this means:

(a) *"All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

(b) *Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

(i) *The application of policies in this Framework that protects areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development*

(ii) *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

b) Plan-making

2.5 Paragraphs 15 to 38 of the Framework relate specifically to 'plan-making'.

2.6 Paragraph 15 states that the planning system should be genuinely plan-led. Plans should provide a positive vision for the future of each area including addressing other economic, social and environmental priorities.

2.7 Paragraph 16 requires that plans are prepared with the objective of contributing to the achievement of sustainable development, and be prepared positively, in a way that is aspirational but deliverable. They should also be shaped by early, proportionate and effective engagement between plan-makers and communities. Policies should be written in a clear and unambiguous way and serve a clear purpose.

2.8 Paragraph 20 requires that the strategic policies should set out an overall strategy for the pattern, scale and quality of development, making sufficient provision for employment development.

2.9 Paragraph 23 states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.

2.10 Paragraph 32 requires that the preparation of policies should be underpinned by relevant up-to-date, adequate and proportionate evidence and take into account relevant market signals.

2.11 Paragraph 36 presents a key point in relation to the examination of Local Plans. It states that plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are;

(a) ***"Positively prepared*** *- providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
(b) ***Justified*** *– an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
(c) ***Effective*** *– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
(d) ***Consistent with national policy*** *– enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."*

c) Building a Strong, Competitive Economy

2.12 Paragraphs 85 to 89 relate to 'building a strong, competitive economy'.

2.13 Paragraph 85 requires that 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.

2.14 Paragraph 86 states that planning policies should:

(a) *"Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration;*
(b) *Set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
(c) *Pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;*
(d) *Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
(e) *Be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances."*

2.15 Paragraph 87 requires that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for

clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

2.16 Paragraphs 88 and 89 relate specifically to supporting a prosperous rural economy. Paragraph 88 states that planning policies and decisions should enable:

(a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;
(b) the development and diversification of agricultural and other land-based rural businesses;
(c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
(d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

2.17 Paragraph 89 states that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

d) Protecting Green Belt Land

2.18 Paragraphs 142 to 160 of the NPPF relate specifically to the protection of Green Belt land.

2.19 Paragraph 145 states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans.

2.20 Paragraph 146 details the exceptional circumstances for which Green Belt boundaries could be altered for, which include instances where an authority cannot meet its identified need for homes, commercial or other development through other means.

2.21 Paragraph 147 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, 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. This will be assessed through the examination of its strategic policies which will take into account the preceding paragraph and whether the strategy:

(a) Makes as much use as possible of suitable brownfield sites and underutilised land;
(b) Optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
(c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

2.22 Where it is necessary to release Green Belt land for development, Paragraph 148 states that plans should give priority to previously developed land, then consider Grey Belt which is not previously developed, and then other Green Belt locations. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt

boundary

2.23 The Planning Practice Guidance reinforces that potential Grey Belt land should be identified as part of the review of Green Belt boundaries that may need to be undertaken as part of the plan-making process. This is in order to inform the review so that the *prioritisation* set out at NPPF2024 Paragraphs 147 and 148 can be achieved (PPG ID: 64-001-20250225). In other words, where needs are identified as part of the plan-making process opportunities should be sought to address these on suitably located Grey Belt land *ahead of* non-Grey Green Belt land.

2.24 In the context of the revised national policy position on Green Belt and Grey Belt introduced in the December 2024 NPPF, it is particularly important that local planning authorities demonstrate that their site selection process has prioritised previously developed land and Grey Belt locations before considering other Green Belt sites. Failure to do so risks rendering the spatial strategy inconsistent with national policy and therefore unsound.

2.25 Paragraph 155 notes that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

(a) The development would utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
(b) There is a demonstrable unmet need for the type of development proposed;
(c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
(d) Where applicable the development proposed meets the 'Golden Rules' requirements.

3.0 LOCAL PLAN – POLICY S3 STRATEGY FOR EMPLOYMENT LAND

3.1 Policy S3 (Strategy for Employment Land) sets out the locations at which employment land will be delivered to meet identified needs in the period 2025-2042.

3.2 The strategy as currently drafted raises several soundness concerns, particularly regarding whether the floorspace to be delivered is sufficient. It is relevant to note that the evidence base for plan-making in Rugby commenced under different versions of the NPPF and prior to revisions to the Government's Standard Method to calculate local housing need.

3.3 The Coventry and Warwickshire HEDNA-WMSESS Alignment Paper and Rugby Office Needs Assessment Update together identify a local employment requirement of 66.2 hectares, comprising 5.4 ha of land for offices and a pro-rated 60.8 ha of land for general industrial uses (E(g)(iii), B2 and B8 units under 9,000 sqm).

3.4 The requirement for strategic industrial uses (E(g)(iii), B2 and B8 units over 9,000 sqm) is specified as a total requirement figure for Coventry and Warwickshire as a whole of 796 to 978 ha (Addendum to the Coventry and Warwickshire Alignment Paper, 2025). The Council has determined the land need for Rugby to be 116.5 ha. Both of these figures include a flexibility margin to allow for the potential delay in some sites coming forwards and the potential for increases in future demand in excess of the forecasts.

3.5 The Policy states that 3.95 ha of E(g)(i-ii) office floorspace will be delivered. It also identifies 287 hectares of floorspace for use classes E(g)(ii), E(g)(iii), B2 and B8 in the below locations:

Table 2: Locations of Delivery for E(g)(iii), B2 and B8

Site Name	Approximate sqm of Floorspace 2025-2042
Prospero Ansty and Ansty Park	26,663
Coton Park east of Castle Mound	26,421
Padge Hall Farm	137,730
Houlton remaining employment land	15,000
Employment Planning Permissions on Small Sites as at 1 April 2025	13,429.4
New Allocations under Policy S7	
Crowner Fields Farm, Antsy	275,000
Coton Park east	115,000
South West Rugby Phase 2	60,000
Antsy Park north	75,000
Land at Walsgrave Hill	290,000
Total	**1,034,243**

3.6 The 182.7 ha requirement as identified in the evidence base is proposed to be met from identified sources of supply and proposed allocations. It is unclear which (if any) of the existing and proposed allocation sites and existing commitments are contributing to the overall requirement for strategic industrial floorspace, and therefore how much of the remaining allocations/commitments are intended to meet local employment land needs. This

makes the Council's application of its strategic evidence base highly divorced from plan-making for local property market dynamics and market signals.

3.7 It should be noted that the requirement has decreased since the 2022 HEDNA despite completions, including those contributing towards local elements of need, remaining strong. The forecast number of jobs has also increased, with CE projecting a change of 7,684 jobs between 2022-2043 in Rugby, whilst Experian now forecast a change of 9,000 jobs over the same timeframe. The HEDNA set out a requirement for 155.7 ha for office and local industrial use, with a share of 551 ha of strategic B8. It is not clear why the requirement has decreased since the HEDNA in the face of evidence for stronger demand.

3.8 It is important to consider whether the floorspace requirement set out in the WMSESS-HEDNA Alignment Papers is sufficient to meet needs across the Plan Period. The Home-Jobs Alignment Paper as published in December 2025 states that *"the evidence points towards a broad alignment between homes and jobs within the sub-region, but with the potential for growth in economic participation over the coming decades to support some additional employment growth."*

3.9 Firstly, it should be noted that the Paper takes a stance for the region of Coventry and Warwickshire as a whole and does not break down analysis for each of the authorities. This presents a soundness concern surrounding the effectiveness of the evidence for Rugby particularly given the local context of high rates of housing delivery, strong population growth and strong labour demand.

3.10 Secondly, the quoted section suggests that the growth in population has the potential to support additional employment growth, beyond that which is supported by the evidence base aligned to the WMSESS. It is therefore unclear how justified the floorspace requirements identified in Policy S3 are. Without prejudice to the fact that we consider that demographic assumptions associated with the revised Standard Method would be consistent with imposing constraints on the borough's potential for growth it is nonetheless the case that achieving an effective alignment between jobs and homes in Rugby supports planning for higher levels of economic participation.

3.11 The borough is strategically located adjacent to further strategic employment opportunities at DIRFT in Rugby and has a history of addressing Coventry's unmet needs. This means it has witnessed strong growth in the working age population but still exhibits not insignificant levels of absolute out-commuting. However, significant housing and population growth is also planned in West Northamptonshire and elsewhere in Warwickshire that should reduce pressure on out-commuting. The borough is extremely well-placed to continue to support cross-boundary strategic priorities and sustain higher levels of housing delivery, but it is therefore important to recognise that local opportunities for job creation are an important element of supporting a sustainable balance of jobs and homes.

3.12 Further questions over the justification of the housing and employment requirement are presented when the Topic Paper: The Development of Rugby Borough 2011-2024 and the Sub-national Population Projections are considered.

3.13 Population expansion has been rapid between 2011 and 2021 at a growth rate of 14.3%. This positions Rugby as the highest growing authority in the West Midlands and 17th out of 367 local authorities in England and Wales (Topic Paper: The Development of Rugby Borough 2011-2024). Importantly, the average age of the authority has remained the same, there has been a significant uplift in education status, the level of unemployment has reduced by a quarter, and a shift has occurred away from part-time towards full-time work. This

suggests there is a greater need for permitted E(g)(i-iii), B2 and B8 employment development, as skilled jobs are increasingly becoming required.

3.14 Additionally, the 2022 Sub-national Population Projections reveal that between 2025 and 2043, the population of Rugby is expected to grow by 17.3%, resulting in a population growth of 21,092. This is greater than the 17,800 figure which is supported through a provision of 11,450 dwellings as stated in the HEDNA. The latest evidence base contained in the Jobs-Homes Alignment Paper is predicated on the revised Standard Method and a lower level of housing growth than recommended in the previous HEDNA. While the alignment is not disaggregated at authority level it follows that for Rugby this is likely to support even lower population growth than is currently expected in official projections. Therefore, there is likely to be a significant increase beyond what is planned for in terms of the working age population. The floorspace which is required to support businesses and employees throughout the plan period is therefore not justified against the most up-to-date population projections. The alignment is principally predicated on the indicators of demand for strategic floorspace set out in the WMSESS, therefore relatively divorced from the local population, labour demand and property market dynamics in Rugby. It is these local factors, and additional opportunities for local employment growth, that should be supported if looked to maintain a sustainable link between jobs and homes.

3.15 When considered together, the evidence on population growth, labour market participation and economic forecasts indicates that the level of employment land provision currently proposed in the Draft Local Plan may underestimate future requirements. The Plan should therefore provide sufficient flexibility within the employment land portfolio to respond to stronger than forecast economic growth. The current strategy does not achieve this flexibility.

3.16 The Plan is therefore not justified based on the presented evidence, nor is it positively prepared to take account of the growth in economic participation and employment. The policy is unsound on this basis.

3.17 The broad location of Ryton is nonetheless also considered suitable to address Coventry's unmet needs given its location close to Coventry and its airport, as well as the good access to A roads and motorways. The location has synergies with existing and recent employment developments on the city's southeastern edge.

3.18 In terms of office provision, a supply of 3.95 ha is identified in Paragraph A of Policy S3 against a requirement of 5.4 ha (Office Needs Assessment Update, 2025). The supply identified in the Plan is a residual figure, accounting for completions at Wago Ltd, Houlton prior to 2025. It is wholly unclear whether this single record should be regarded as meeting a substantial portion of total identified demand particularly given its location in the far east of the borough away from the Coventry Fringe. This is not addressed in the Office Needs Assessment quoting the full 5.4ha requirement. The majority of this identified supply towards residual needs comes from the 18,000 sqm of floorspace at Crowner Fields Farm, Ansty, which is the only allocation to include office floorspace as a provision greater than ancillary.

3.19 This is particularly concerning when considering the low vacancy rate for offices across Rugby. The vacancy rate as of November 2025 was just 2.4% in Rugby which is significantly lower than the 8.7% in the UK. This rate has always been below that of the UK and Coventry & Warwickshire. A healthy vacancy rate is generally acknowledged to be between 5% and 10%, with a rate of 2.4% suggesting an undersupplied and constrained market. This suggests the Rugby supply is not sufficient in providing flexibility and meeting the needs of businesses across the Borough.

3.20 Having only one office allocation which does not meet the identified need in the Office Needs Assessment Update is unsound. It is not positively prepared or consistent with national policy. Paragraph 86 outlines the need for planning policies to be flexible enough to accommodate needs not anticipated in the plan which is not met through having just one allocation for office space. Providing only one allocation does not meet the needs of businesses across the Borough as it fails to provide choice and flexibility in the market and serves only to meet the needs of businesses which are able to relocate or grow-on to the Ansty site. The allocation of only one site is even more concerning when the low office vacancy rate of the Borough is considered. Choice and flexibility is not currently being provided, nor will it be provided into the future.

3.21 To conclude, Policy S3 is considered to be **unsound**. Given the significant growth in the population of Rugby in recent years, the population projections and increased jobs forecast, it is clear that both in terms of housing and employment, the Plan underestimates the necessary provision to meet needs. The policy is therefore neither justified nor positively prepared to meet evolving needs. This point also applies to the lack of allocations for office floorspace despite the evidence indicating a greater requirement and the NPPF emphasising the need for flexibility. As a result, the policy is also not consistent with national policy.

3.22 The Ryton Fields Farm site (Site Ref. 2) is proposed to include over 7,200 sqm of E floorspace including office E(g)(i) floorspace. The site is available and deliverable (**Appendices 4 and 5**) This would help to meet the identified remaining office floorspace needs and provide greater choice and flexibility. It will also support the requirement for the Local Plan to plan positively. The site is well-positioned to contribute towards addressing the unmet needs of Coventry, given its location on the edge of the city and close to a strategic road network (**Appendices 2 and 3**).

4.0 LOCAL PLAN – POLICY S7 EMPLOYMENT ALLOCATIONS

4.1 Policy S7 (Employment Allocations) sets out the list of new site allocations which are proposed by the Plan. The policy is considered to be **unsound** due to inconsistencies with national policy, specifically Paragraphs 86, 88 and 148 of the NPPF. The policy is also not justified as it is not proportionally based on its own evidence regarding the need to provide for SMEs. The lack of flexibility for small and medium sized units means the plan is not positively prepared.

4.2 As stated in Paragraph 2.27 of the HEDNA (2022), *"Across the sub-region, 80% of businesses have less than 10 employees and 99.6% are Small and Medium-Sized Enterprises with less than 250 employees."* The latest evidence, presented in the Development of Rugby Borough Topic Paper shows that there is now an increased percentage of businesses with fewer than 10 employees at 86% in 2023, and the percentage of businesses which are SMEs is at 99.4%. It is therefore important that the needs of these smaller businesses continue to be met, including through the provision of high quality, small-medium scale units which are capable of meeting flexible employment needs (including a mixture of E(g)(i-iii), B2 and B8 floorspace) and provide 'grow-on' space capable of allowing future business growth.

4.3 However, Table A7.1 of the West Midlands Strategic Employment Sites Study 2023/24 outlines a 0% delivery of small units on strategic sites post-2012 in Ryton-on-Dunsmore. This point demonstrates a significant undersupply and lack of choice in the market.

4.4 Paragraph 1.25 of the Plan confirms the skewing of recent delivery towards large units, with fewer smaller units for SMEs. It states that some of the site allocations under Policy S7 require smaller units.

4.5 The need for available and affordable grow-on space is continually identified as an inhibitor to growth and as a reason for businesses relocating out of the borough in the Rugby Economic Strategy (2025-2035). It details how new employment sites in the Local Plan have focused on large units resulting in a lack of supply of small on grow-on space units. The Strategy states that the allocation of small unit space in the emerging Local Plan will be used to ensure the delivery of high quality small to medium size industrial space in accessible locations. However, as outlined in Table 2, the new allocations are of a large size and concentrated in the very north western point of the Borough. Sites such as Walsgrave Hill, specifically identified to accommodate the requirements for multiple strategic sites identified in the WMSESS at a single location, are highly divorced from the A45 corridor (particularly at Ryton) as a location with strong identified demand for SMEs (see **Appendices 2 and 3**).

4.6 The Ryton-on-Dunsmore Neighbourhood Plan (2018-2031) also emphasises the need for smaller units, as parishioners have been clear in their desire for any new employment initiatives to be small-scale such as offices, which the development proposed at the Ryton Fields Farm site includes.

4.7 The Neighbourhood Plan approach is consistent with national policy in terms of providing a range of small-scale accommodation. As set out in Paragraph 88 of the NPPF, the sustainable growth and expansion of all types of business in rural areas should be enabled through planning policies and decisions. This includes providing suitable accommodation for smaller business to operate and expand into to support existing local businesses within Rugby.

4.8 Therefore, the points above demonstrate that the evidence base emphasises the need for

smaller units throughout the Borough to provide space for SMEs, which comprise 99.4% of businesses. Despite this demonstrated need for smaller units, larger units have primarily been delivered recently. It is important to consider this evidence alongside the analysis below.

4.9 Policy S7 allocates five sites for employment use, which include the following:

Table 3: Employment Allocations by Floorspace

Site Ref.	Site Name	Approximate sqm of Floorspace (sqm)
64	Coton Park East	115,000
17	South West Rugby Employment Phase 2	60,000
14	North of Ansty Park	75,000
95	Crowner Fields Farm and Home Farm, Ansty	275,000
121	Land at Walsgrave Hill	290,000
	Total	**865,000**

4.10 The allocations made in Policy S7 are therefore sites of a substantial size, particularly land at Walsgrave Hill and Crowner Fields Farm and Home Farm, Ansty. These two sites are located in very close proximity to the north west of the Borough. This concentration of allocations results in a significant geographic imbalance in the spatial distribution of employment land across the Borough.

4.11 The majority of new employment development is focused within a small cluster north of Coventry near Ansty, while no employment allocation is proposed in the Ryton-on-Dunsmore area. This spatial concentration also risks undermining the objective of achieving a sustainable distribution of employment opportunities across the Borough. The absence of any employment allocation in the Ryton-on-Dunsmore area is particularly notable given the scale of recent housing development and associated population growth in this location.

4.12 A more balanced spatial strategy would ensure that employment opportunities are provided closer to areas of housing growth, thereby reducing the need to travel and supporting sustainable patterns of development.

4.13 Despite the need for allocations to provide smaller and medium-sized units as outlined in Paragraph 1.25 of the Plan, the proposed allocation sites provide little floorspace for small and medium units according to the Employment Allocations Annex. Coton Park East will provide only 4,000 sqm of space for smaller units of up to 1,500 sqm for SMEs. Land at Walsgrave Hill will provide 7,500 sqm of floorspace in smaller to medium size buildings (units ranging from 60 sqm to 1,500 sqm) to provide space for SMEs. The total floorspace allocated for SMEs is therefore 11,500 sqm out of a total 865,000 sqm. This is just 1.3%.

4.14 This extremely limited provision for smaller employment units demonstrates a significant mismatch between the Local Plan's employment land strategy and the structure of the local economy. In an area where over 99% of businesses fall within the SME category, allocating only 1.3% of employment floorspace capable of accommodating such businesses cannot reasonably be regarded as a proportionate or justified response to identified economic needs. The Strategy therefore fails to provide an effective supply of premises capable of meeting the needs of the local business base.

4.15 The Sustainability Appraisal of the Plan adopts a narrow focus on assessing the effects of reasonable alternatives for economic development based on their contribution to overall quantitative needs. The testing of effects should be differentiated to recognise that the selected option limits opportunities for SMEs, which in-turn negatively affects social indicators such reducing the need to travel and supporting education and skills development.

4.16 The allocated employment sites have therefore not been justified by the evidence base. The policy is also not effective as it will result in unmet needs from SMEs who are seeking grow-on space. The policy is therefore **unsound** on this basis.

4.17 The economic strategy does not encourage sustainable economic growth for smaller businesses, nor does it have regard to local strategies for economic development and regeneration. This further renders the policy unsound as it is not consistent with Paragraph 86a of the NPPF. The policy is also not consistent with Paragraph 88 of the NPPF as suitable accommodation for smaller business to operate and expand into is not provided. It is unclear how this small provision will meet Paragraph 86e of the NPPF which states that planning policies should be flexible enough to accommodate needs not anticipated in the plan.

4.18 The Ryton Fields Farm site (Site Ref. 2) is a 22.8 ha site area with the potential for delivery of over 63,000 sqm of E(i-iii), B2 and B8 floorspace. However, the site is proposed to provide 9,570 sqm of small-medium units under 2,000 sqm. A further 17,300 sqm is proposed comprising units of approximately 5,000 sqm or below. This is summarised in the table below. It is therefore evident that Ryton Fields Farm has the potential to address the need for smaller and medium-sized units that are lacking across the Borough, particularly to the west of the Borough and in Ryton-on-Dunsmore. Given its smaller size, it is also highly deliverable and immediately available to meet an identified need.

Table 4: Summary of Deliverable Employment Floorspace (E(i-iii), B2, B8) at Ryton Fields Farm

Site Area	Total Deliverable Site Floorspace	Floorspace Deliverable on Small-Medium Units (under 2,000 sqm)	Floorspace Deliverable on Medium Units (2,000 to 5,000 sqm)
22.8 ha	63,000 sqm	9,570 sqm	17,300 sqm

4.19 In addition to addressing the need for smaller and medium-sized employment units, the scale and configuration of the Ryton Fields Farm site means that it is capable of being delivered within a relatively short timeframe compared to larger strategic allocations. The site therefore provides an opportunity to support early delivery of employment floorspace within the plan period and to increase flexibility in the employment land portfolio should larger strategic sites experience delays.

4.20 In terms of the allocated sites, a major change to Policy S7 between the Regulation 18 and Regulation 19 Plans is the omission of Prologis Park and the replacement with an allocation at Land at Walsgrave Hill on the edge of Coventry. The site is mainly located within the Green Belt, making strong contributions to Green Belt purposes A and C and a moderate contribution to purpose B. This is inconsistent with national policy as the Plan has not prioritised the allocation of Grey Belt land before Green Belt, required by Paragraph 148 of the NPPF:

"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider Grey Belt which is not previously developed, and then other Green Belt locations"

4.21 The Council should therefore be looking at and allocating Grey Belt sites before non-Grey Green Belt sites.

4.22 This is further unjustified as the Prologis Park allocation was located in Ryton-on-Dunsmore, an area now without an employment allocation, whereas the Walsgrave Hill site is located in close proximity to two Ansty allocations. The employment allocations have therefore become concentrated in one small area to the west of the Borough. A more logical replacement of the Prologis Park site, ensuring sustainable growth is achieved across the Borough and in line with Paragraph 148 of the NPPF, would be the Ryton Fields Farm site.

4.23 The allocation of Land at Walsgrave Hill, which is largely located within the Green Belt and assessed as making stronger contributions to Green Belt purposes, ahead of the Ryton Fields Farm site which is predominantly Grey Belt land, is inconsistent with the sequential approach established by Paragraph 148 of the NPPF. Where Green Belt release is required, national policy requires authorities to prioritise previously developed land and Grey Belt land before considering other Green Belt locations.

4.24 More generally, a wider choice and a greater mix of sites across the Borough should be allocated to address a range of needs. This also coincides with the requirement to allocate Grey Belt sites first as the majority of the south of the District (without current allocations) is proposed as Grey Belt. Additionally, a wider choice and greater mix of sites would provide for the unmet need for smaller units.

4.25 To conclude, we find Policy S7 **unsound** as it is not consistent with national policy regarding the prioritisation of Grey Belt land over Green Belt. Additionally, the policy is not justified as a very low proportion of small and medium units are identified against an evidenced need for floorspace for SMEs across the Borough. The plan is not positively prepared as the lack of flexibility provided for SMEs is extremely low. Just 1.3% of the total allocated floorspace is not sufficient to provide for the 99.4% of businesses in the Borough which are SMEs. It is even less sufficient to provide for the 86% of businesses with fewer than 10 employees which will require small units.

4.26 **Appendices 2 and 3** attached to this report are letters from commercial agents which confirm that there remains ongoing demand for mid-sized industrial and warehouse units within Rugby.

4.27 As outlined, the allocation of the Ryton Fields Farm site would address all of the points raised above in relation to Grey Belt, the lack of allocated land to the south west of the Borough, and the need to provide units for SMEs. 60% of the site is located within the Grey Belt and so national policy dictates that Ryton Fields Farm should be considered for allocation before Land at Walsgrave Hill. The provision of 9,570 sqm of smaller units on the site will support the unmet need for small and medium units. The site is available, achievable and deliverable (**Appendices 4 and 5**).

5.0 LOCAL PLAN – POLICY E2 EMPLOYMENT DEVELOPMENT

5.1 Policy E2 of the Plan outlines how the development of employment uses will be permitted within settlement boundaries but outside of Strategic Employment Sites and employment allocations. As currently drafted, the policy is not justified or consistent with national policy due to its lack of regard for rural employment sites outside of settlement boundaries.

5.2 Paragraph A of the policy states:

> *"Within settlement boundaries but outside of Strategic Employment Sites and employment allocations the development of employment uses will be permitted, subject to compliance with other policies of this plan."*

5.3 Outside of settlement boundaries, the permitted development for employment uses is more limited:

- *(i) It would not undermine the continuance of an existing viable agricultural use; and*
- *(ii) It would comprise the conversion or redevelopment at a similar scale of a building that has been in existence for at least ten years; or*
- *(iii) It would comprise a proportionate expansion of an existing building in employment use; or*
- *(iv) It would comprise the infilling of a vacant area within a site in employment use.*

5.4 The accompanying text in Paragraph 3.4 states that "*Paragraph A of the policy supports the delivery of units for small and medium sized businesses in line with the Rugby Borough Economic Strategy."*

5.5 However, the Rugby Economic Strategy (2025-2035) states the following in respect of rural business and economy:

> *"The Local Plan will also ensure that whether urban or rural there are policies to support the local economy so that businesses can prosper, the town centre is regenerated, rural businesses can diversify, and leisure and tourism opportunities are promoted."*
>
> *"Achieving a buy-local culture among residents and businesses with greater connectivity between our rural and urban micro-economies so that money circulates within the Borough as much as possible."*
>
> *"Outside of Rugby town, the main rural settlements of… Ryton-on-Dunsmore have also seen major housing developments"*
>
> *"Rugby Gateway and Symmetry Park have involved the change of use of substantial tracts of agricultural or otherwise rural land which has been necessary to support businesses and bring the jobs necessary to support the expanding population."*

5.6 It is therefore evident that the Economic Strategy outlines the need for rural employment development and for policies within the Local Plan to reflect this. it also acknowledges that the change of use of substantial tracts of agricultural land has been necessary to support the needs of rural businesses and jobs.

5.7 The first two paragraphs quoted from the Economic Strategy conflict with the draft policies as Policy E2 prevents any new small-scale employment development in rural areas which

would allow rural businesses to diversify and prosper. Employment development only within settlement boundaries would not support the circulation of money within the Borough, widening the divide between urban and rural areas.

5.8 Additionally, the third paragraph of the quotation emphasises the need for employment land surrounding Ryton-on-Dunsmore. The population growth increases the number of jobs required to serve the local area.

5.9 Rugby Gateway and Symmetry Park have provided over 200,000 sqm of employment land on what was agricultural land for which the Economic Strategy acknowledged as being necessary to support businesses and the expanding population. the development of agricultural sites outlined in the Strategy as being necessary to support the economy contradicts with draft Policy E2 Paragraph E(i) which would only permit development for employment uses where it would not undermine the continuance of an existing viable agricultural use and where criteria E(ii) – (iv) represent very limited opportunities for new floorspace. The remainder of draft Paragraph E is also contradicted by the Economic Strategy as it further limits economic development in areas outside of the settlement boundary.

5.10 All of the above points illustrate that the policy does not support the delivery of units in line with the Rugby Borough Economic Strategy. The policy is therefore not justified as it is not based on proportionate evidence.

5.11 The NPPF also supports the need for diverse employment in rural areas through Paragraphs 88a and 89. Paragraph 88a states that planning policies and decisions should enable *"the sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing and well-designed new buildings".* However, Policy E2 in its current form largely restricts development to within settlement boundaries and so businesses are not supported in growing and expanding in rural areas. Furthermore, Paragraph E of Policy E2 states that outside of settlement boundaries, development for employment uses will only be permitted where it would comprise use, conversion or expansion of an existing building. This is despite the NPPF stating that both the conversion of existing buildings and the development of well-designed new buildings should be enabled. Plan Policy E2 is therefore not consistent with the NPPF and is **unsound**.

5.12 The proposed policy approach also fails to reflect how existing patterns of development, including at the Ryton Fields Farm site, contribute to providing for the types of needs indicated in the Economic Strategy. As set out in **Appendix 6**, Ryton Fields Farm has a longstanding and evolving planning history demonstrating a transition from purely agricultural use toward mixed agricultural and commercial employment activity. It accommodates existing commercial floorspace and lawful Use Class B2/B8 activities, having not been a purely undeveloped greenfield holding for over two decades. Given the nature of identified needs it is necessary, in order to be positively prepare and consistent with national policy, for Policy E2 to support the expansion of existing sites and employment uses where sustainably-located and with a clearly defined future boundary (such as land contained by the A45 and Warwick Road) in addition to the restrictive approach to 'infilling' in criterion E(iv).

5.13 The policy is therefore also not consistent with Paragraph 89 of the NPPF which states *"planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport".* This suggests that the Local Plan should enable employment development outside of settlement boundaries

with fewer restrictions than those currently set out within Policy E2. The policy is therefore **unsound** in its current form.

5.14 Paragraph C of Policy E2 is too restrictive as it would not easily allow office uses on Strategic Employment Sites or employment locations. The paragraph states that "*Office proposals on Strategic Employment Sites or employment locations will be permitted where there are (in accordance with Policy C2) no sequentially preferable sites available or where it can be demonstrated that the office would be genuinely ancillary in size and function to an existing employment use".* As outlined in the earlier chapter on S3 Strategy for Employment Land, the supply of office accommodation in employment allocations does not meet the minimum requirement as set out in the HEDNA. The policy is therefore not positively prepared and is unsound.

5.15 To conclude, Policy E2 is **unsound** in its current form as it is not consistent with NPPF Paragraphs 88a and 89. It is also not justified as it is inconsistent with its own evidence base (Rugby Economic Strategy 2025-2035). The policy is also not positively prepared in that it restricts employment development in rural areas, despite both the NPPF and local evidence encouraging support for development. It does not easily allow office uses on Strategic Employment Sites or employment locations.

5.16 The Ryton Fields Farm proposal would transform significantly less agricultural land (63,000 sqm) than Rugby Gateway and Symmetry Park for a potentially vital gain in rural employment and provision for local businesses. The site is available and deliverable (**Appendices 4 and 5**). The development of the site would be in line with the evidence presented in the Economic Strategy, however, the Policy E2 in its current form does not allow this. A caveat within the policy to support development for employment uses outside of settlement boundaries where there is an identified need for jobs should be added in order for the policy to be found sound.

6.0 LOCAL PLAN – POLICY E3 RURAL ECONOMY

6.1 In relation to Policy E3, it is first important to highlight Paragraphs 88a and 88b of the NPPF, which state that:

> *"Planning policies and decisions should enable:*
>
> *(a) The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;*
> *(b) The development and diversification of agricultural and other land-based rural businesses…"*

6.2 Paragraph A of Policy E3 presents the forms of development which are acceptable in principle, both in and outside of rural settlement boundaries, subject to their compliance with other policies of the plan:

(i) small-scale tourism, visitor accommodation and leisure-based uses including sport and recreation;
(ii) small-scale expansion of existing holiday caravan/chalet sites;
(iii) garden centres and nurseries;
(iv) equine and equestrian development;
(v) agricultural and forestry buildings;
(vi) new canal-based facilities, but, where such facilities are outside of settlement boundaries, not including permanent residential moorings.

6.3 Paragraph 88a of the NPPF emphasises the need for diverse employment uses in rural areas, which includes the sustainable growth of ***all*** types of business. Paragraph 88b supports the need for diversification of agricultural and rural businesses.

6.4 Policy E3 does not regard employment uses E(g)(i-iii), B2 and B8 as acceptable forms of development in rural areas, focusing largely on tourism, leisure and agricultural employment uses. Therefore, it does not support the sustainable growth and expansion of all types of business in rural areas and is not consistent with national policy. In its current form, the policy is therefore unsound.

6.5 Additionally, Paragraph E of the policy outlines that the diversification of farms will only be permitted where:

(i) best and most versatile agricultural land is avoided;
(ii) new uses are subservient in scale to the main agricultural use; and
(iii) existing buildings are used if possible

6.6 Points ii and iii of Paragraph E are restrictive and significantly limit diversification in terms of requiring the use to be primarily agricultural. However, Paragraph 88b of the NPPF, as outlined above, states that planning policies should enable the diversification of agricultural and other land-based rural businesses. Point iii also outlines the need for existing buildings to be used if possible, despite NPPF Paragraph 88a giving equal support for both the conversion of existing buildings and well-designed new buildings in rural areas.

6.7 The Rugby Borough Economic Strategy (2025-2035) outlines how farms and agricultural land have previously been transformed on a large scale to support businesses and bring the jobs necessary to support the expanding population. This transformation has been in response to rural areas of the Borough including Ryton-on-Dunsmore seeing major housing developments recently. It is therefore unclear as to why no allowance has been made within

the policy to further support the expanding population by providing skilled E(g)(i-iii), B2 and B8 jobs to rural areas. No clause has been included to allow for the development of small and medium scale employment sites on agricultural land close to settlements where major housing developments have been completed. This point is now especially relevant to Ryton-on-Dunsmore as a major change from the Regulation 18 Draft Plan has been the removal of the Prologis Park employment allocation in Ryton, meaning there are no additional employment sites or jobs in the pipeline to support the new population. The policy is therefore not justified as it is not based on proportionate evidence, nor is it positively prepared.

6.8 This population expansion has been rapid between 2011 and 2021 at a growth rate of 14.3%. This positions Rugby as the highest growing authority in the West Midlands and 17th out of 367 local authorities in England and Wales (Topic Paper: The Development of Rugby Borough 2011-2024). Importantly, the average age of the authority's population has remained the same, there has been a significant uplift in education status, the level of unemployment has reduced by a quarter, and a shift has occurred away from part-time towards full-time work. This further emphasises the need for permitted E(g)(i-iii), B2 and B8 employment development in rural areas, as skilled jobs are increasingly becoming required. Policy E3 is therefore not found justified by the Topic Paper evidence and is unsound in this regard.

6.9 To conclude, we find Policy E3 to be **unsound** as it is not consistent with Paragraphs 88a and 88b of the NPPF. The policy does not support the provision of E(g)(i-iii), B2 and B8 jobs in rural areas, despite the NPPF requiring planning policies to enable all types of businesses in rural areas, supporting diversification of agricultural businesses. Additionally, the policy is not justified or positively prepared as it does not make allowances for employment to provide for significant recent population expansion in rural areas.

6.10 The amending of the policy and the allocation of the Ryton Fields Farm site for employment would result in the provision of much needed skilled jobs for Ryton-on-Dunsmore, which currently has no allocated employment sites. The site is available and deliverable (**Appendices 4 and 5**).

7.0 STAGE 2 SITE ASSESSMENT REPORT

7.1 The Ryton Fields Farm site (Site 2) was not progressed beyond the Stage 2 Site Assessment as detailed in the Rugby Borough Stage 2 Site Options Assessment (March 2025). This has later been updated in December 2025, however the outcome for the site remains the same. The omission of the site from further assessment and allocation within the Plan is **unsound**. As set out below, the evidence does not justify the exclusion of the site and so the Plan is not positively prepared, justified or consistent with Paragraphs 89 and 148 of the NPPF.

7.2 It is also relevant to consider whether the site selection process has properly evaluated reasonable alternatives in accordance with the requirements of national policy and the Sustainability Appraisal process. Where a site is demonstrably suitable, available and achievable, and capable of addressing identified deficiencies in the spatial strategy, it should form part of the reasonable alternatives tested through the plan-making process. The omission of such sites risks undermining the robustness of the site selection methodology and the justification of the Plan.

7.3 The Council's reasoning as to why the site was not progressed in the December 2025 Assessment is as follows:

> *"The site comprises arable and pastoral fields with industrial buildings and a residential property east of Ryton-on-Dunsmore. Landscape sensitivity is low and heritage constraints have not been identified. The site is partially within the Green Belt* ***with the remainder provisionally identified as Grey Belt****. The principal reasons for not progressing the site are its lack of proximity to existing built development and the combination of other constraints affecting the site, including ecology, Green Belt and agricultural land classification. Although not the worst site for accessibility, it is unclear how safe, convenient bus or pedestrian access could be achieved. Additionally, the site comprises very good quality agricultural land."*

7.4 The reasoning set out in the Stage 2 Site Assessment demonstrates several inconsistencies in the application of the Council's own assessment criteria and national policy. In particular, the weighting given to Green Belt constraints, accessibility considerations and ecological matters does not appear to have been applied consistently across the range of sites assessed. This raises concerns regarding the robustness and consistency of the site selection methodology and whether reasonable alternatives have been properly considered in accordance with the requirements of national policy.

7.5 The only change, though a highly significant one, that has been made to the assessment of the site between March and December is the addition of the bold text stating that the site is partially in the Green Belt 'with the remainder provisionally identified as Grey Belt'. Approximately 60% of the site is identified as Grey Belt.

7.6 Paragraph 155 of the NPPF states that, in relation to decision-making:

> *"The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all of the following apply:*
>
> *a. The development would utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan" …*

7.7 The Council places significant weight on the site's Green Belt status in determining its Site

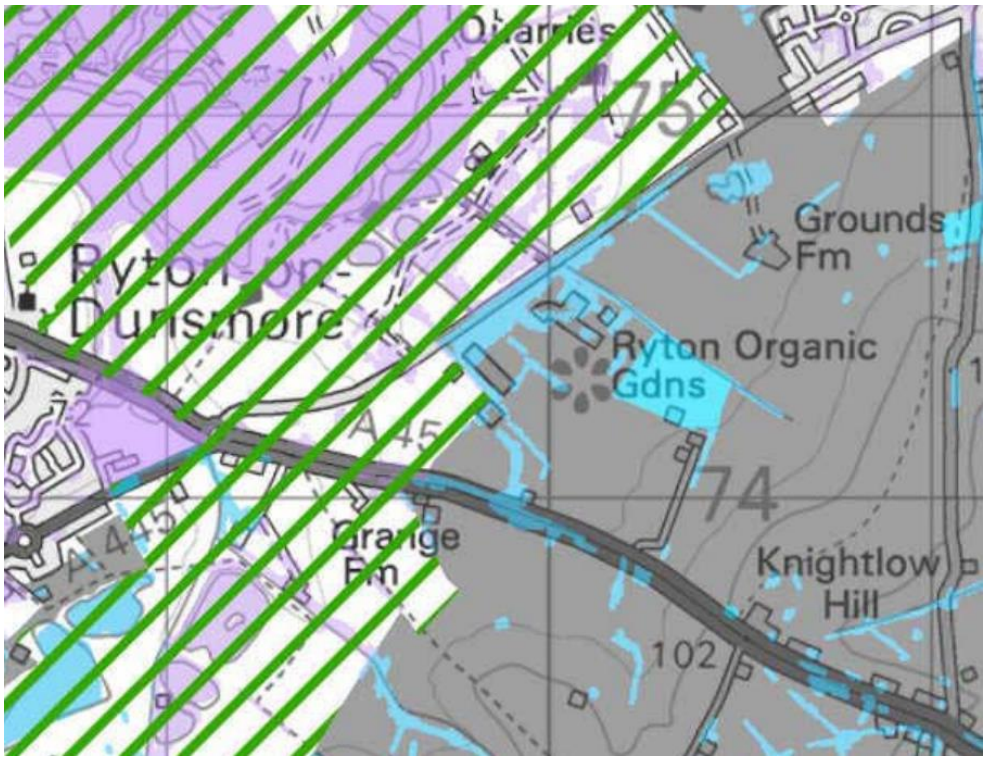
Assessment outcome. However, the majority of the site is Grey Belt. Paragraph 155 of the NPPF confirms that commercial development here should not be regarded as inappropriate. These representations further indicate that there will remain unmet needs (particularly for office floorspace and to address local employment needs for SMEs) under the strategic policies as proposed (therefore NPPF Paragraph 155(b) would be satisfied). For the purposes of plan-making in the face of these identified needs and in accordance with NPPF Paragraph 148 to prioritise land including the Grey Belt ahead of non-Grey Green Belt the location forms a sequentially preferable location to address these needs. It is therefore not justified and unsound to state a principal reason for not progressing the site is the constraint of Green Belt land.

7.8 At the same time, an allocation at Land at Walsgrave Hill on the edge of Coventry has been proposed in the Regulation 19 Plan. The site is mainly located within the Green Belt, making strong contributions to Green Belt purposes A and C and a moderate contribution to purpose B. The site assessment process is therefore unsound as it is inconsistent in its methodology and not compliant with the NPPF, including Paragraph 148 which states:

> *"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider Grey Belt which is not previously developed, and then other Green Belt locations"*

7.9 Whilst we agree that the Ryton Fields Farm site is identified as Grey Belt, there is justification to consider the entire site area, rather than just 60%, as Grey Belt land. The Green Belt Contribution Study outlined the land potentially suitable for definition as Grey Belt land within the Borough in grey below:

Figure 2: Proposed Grey Belt Land Surrounding Ryton Fields Farm



Source: *Green Belt Contribution Study (2024)*

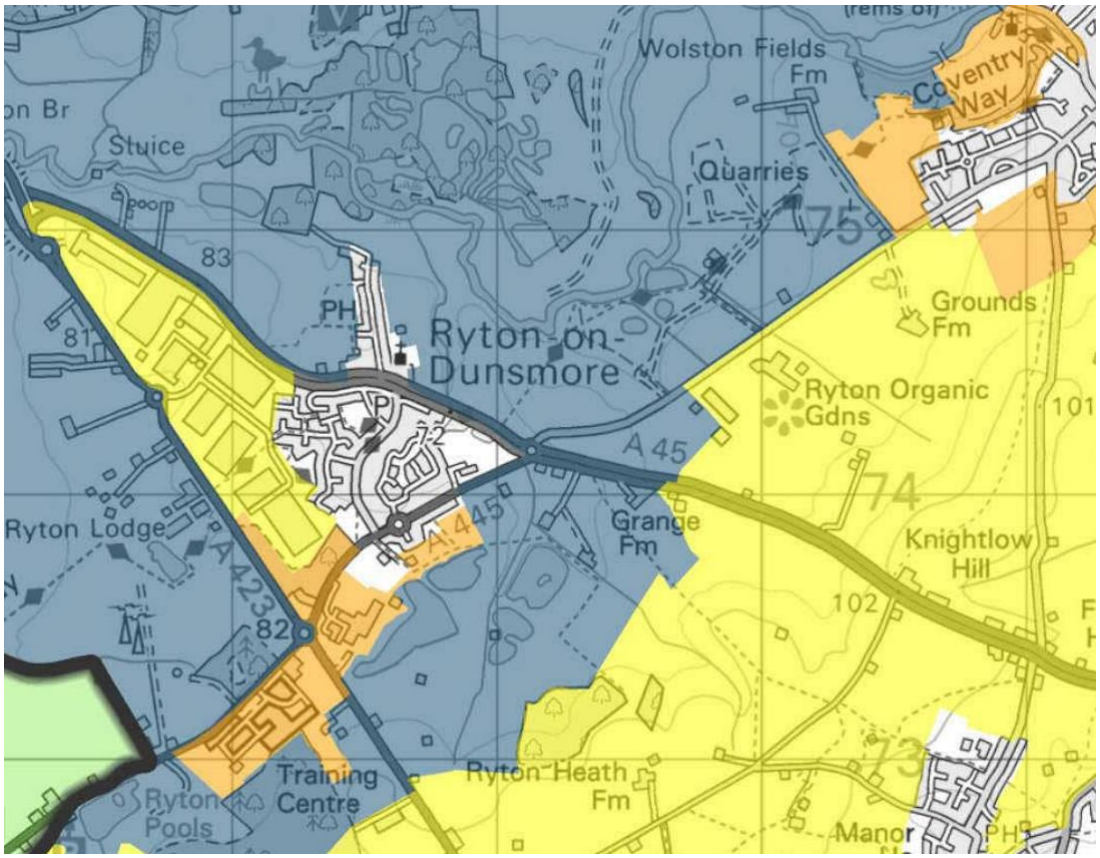
7.10 The map shows that the main portion of the site not defined as Grey Belt (excluding the areas which overlap with footnote 7 designations in the borough – albeit these only relate to surface water drainage and should not be regarded as strong reasons to restrict development) is to the west of the site, closest to Ryton on Dunsmore.

7.11 Figure 4.2 of the Green Belt Contribution Study suggests that a very small portion of the west corner (closest to Ryton) makes a strong contribution to Purpose A of the Green Belt. However, this is only an isolated contribution given the Coventry University development (used daily by staff, students and visitors) to the east of the site, and existing buildings, including established commercial floorspace and B2/B8 uses, within the site.

7.12 The remaining site area, all of which is further away from Ryton, is defined as having only a weak or no contribution to the purpose. **Appendix 6** of these representations, consistent with the Council's assessment proforma, reinforces the site's existing role in providing for commercial floorspace including associated vehicle movements and hardstanding. These characteristics are not properly reflected in the Green Belt Assessment. The parcel as a whole cannot be regarded as a greenfield holding. To avoid the isolated 'strong' western corner of the site, it is unjustified as to why a finger of moderate contribution shouldn't extend all the way from the roundabout to the Coventry University site, similar to how south west Ryton appears and where associated land in the Green Belt cannot be considered to make a strong contribution to preventing unrestricted sprawl. Warwick Road provides a strong boundary feature. It is wholly unreasonable to consider that the balance of the Ryton Fields Farm site not identified as Grey Belt – where it has a strong relationship with existing buildings and is tightly bounded by the A45 and Warwick Road – shares the same characteristics to the extensive area north of Warwick Road in terms of contributions to Purpose A.

7.13 It is also important to recognise that the site already accommodates established commercial activity, including lawful B2 and B8 uses operating from purpose-built structures with associated vehicle movements and areas of hardstanding. These characteristics demonstrate that the land does not function as an undeveloped agricultural landscape but rather forms part of an established employment environment. The proposed development would therefore represent the logical consolidation and expansion of an existing employment location rather than the introduction of a wholly new industrial site within open countryside.

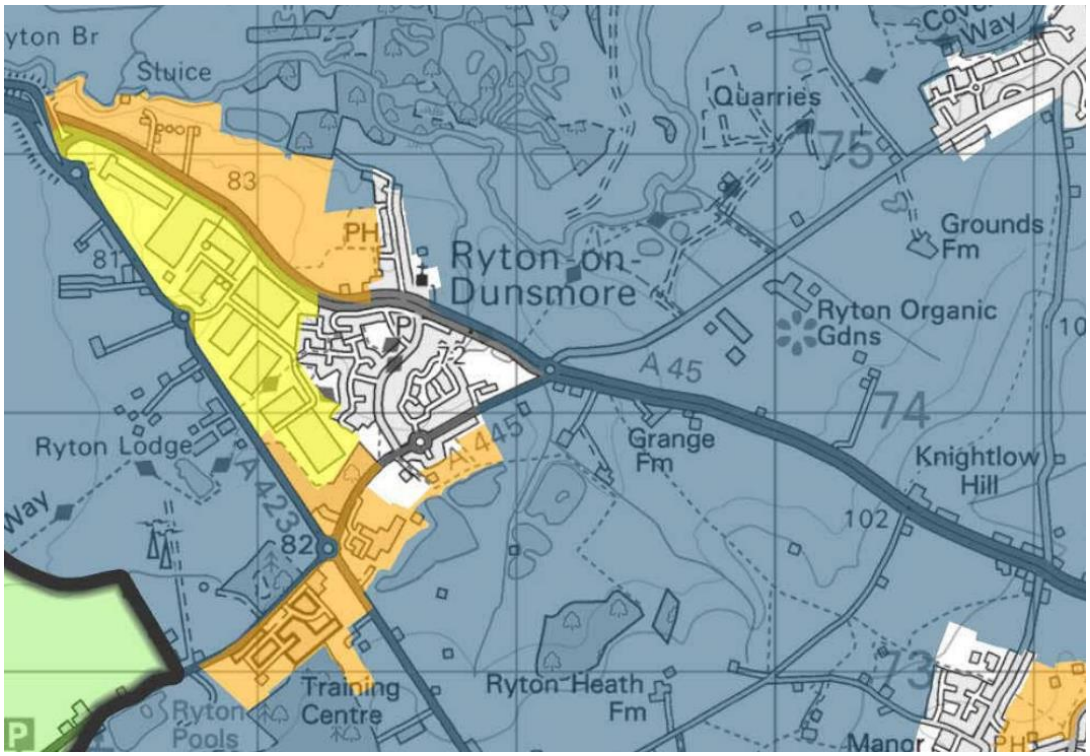
Figure 3: Extract from Figure 4.2 of the Green Belt Contribution Study



Source: *Green Belt Contribution Study (2024)*

7.14 Similarly, given the development of the farm and B2/B8 uses on the site, and Coventry University surrounding the site, it is unclear as to why the contribution to Purpose C (assisting in safeguarding the countryside from encroachment) is defined as strong. We propose a more justified and effective way of evaluating the site would be to define a finger of moderate contribution on the, again, similar to how south west Ryton has been defined. While not determinative to its classification as Grey Belt this would reinforce that the location is not one where development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan or in the vicinity of the site itself.

Figure 4: Extract from Figure 4.4 of the Green Belt Contribution Study



Source: *Green Belt Contribution Study (2024)*

7.15 There are several other soundness concerns regarding the site assessments of the Ryton Fields Farm site. One of the Council's principal reasons for not progressing the site was a lack of proximity to the existing built development. Considered alone, the assessment is inaccurate as the site lies directly east of the A45 and just across from the settlement boundary. Immediately adjacent to the site is Ryton Organic Gardens, which has been operated by Coventry University since September 2019 as a teaching and research facility. The site accommodates a significant level of daily activity with an estimated 50–90 staff and students regularly present, as well as a shuttle bus service operating from Coventry University. This further demonstrates that the area already accommodates active institutional uses and regular transport movements, undermining the suggestion that the site is isolated from existing development.

7.16 However, this evaluation is also not consistent with the NPPF. Paragraph 89 states that *"planning policies and decisions should recognise that sites to meet local businesses and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport."* This means that even if the site was not located adjacent to the settlement boundary or near existing development, as the Council's assessment states, it would be unjustified and unsound to exclude the site on the basis of this criteria, particularly given the existing commercial uses within buildings at the site.

7.17 Several elements of the assessment outcome are not consistent with the Council's own evidence. Ecology is also listed as a principal reason for not progressing the site. However, the evaluation summary within the ecology topic area states that the site has the potential to be taken forward for development subject to demonstrating that there would be no adverse

effects upon Brandon Marsh SSSI or the LWS through sensitive site design and the adoption of appropriate mitigation measures. Therefore, ecology is not a key constraint on the site as it could be subject to mitigation. It is unreasonable and unjustified to treat ecology as a principal reason for exclusion. The Ecology Statement attached at **Appendix 7** evidences this point.

7.18 The Highways Deliverability Summary is attached at **Appendix 8** and addresses the Council's concerns regarding access and sustainable transport.

7.19 To conclude, the reasons for which the site was not progressed beyond the Stage 2 Site Assessment are not justified. Several of the principal reasons for not progressing the site are not consistent with NPPF Paragraph 155 in relation to Grey Belt development and Paragraph 89 in relation to business and community development in rural areas. The Stage 2 Site Assessment Report is therefore found **unsound**.

7.20 Were the assessment conclusions found to be consistent with national policy and justified, the site may have been carried through to allocation, providing much needed skilled jobs for Ryton-on-Dunsmore, which currently has no allocated employment sites.

7.21 Given the conclusions set out above, a proportionate and effective modification to the Draft Local Plan would be the allocation of the Ryton Fields Farm site for employment development. This would address the deficiencies identified in the spatial distribution of employment land, provide additional provision for SME-scale units, and ensure that the Plan includes a wider portfolio of deliverable employment sites capable of responding to changing market conditions.

8.0 ADDITIONAL SOUNDNESS CONCERNS

8.1 The definition of employment use within the Glossary of the Plan is *"use within Use Classes B2, B8, E(g)(ii) and E(g)(iii) of the Town and Country Planning (Use Classes) order 1987 (as amended). Subject to compliance of the proposed use with Policy C2 (Main town centre uses) use class E(g)(i) will also be an employment use."*

8.2 Policy C2 Main Town Centre Uses is not applicable to sites outside of a defined settlement boundary, and so this suggests that office floorspace is not classified as an employment use at these locations. The definition of employment use is therefore unsound as it is not consistent with national policy. Paragraph 88a of the NPPF requires planning policies to enable the sustainable growth and expansion of all types of business in rural areas.

8.3 The Office Needs Assessment (2025) also sets out a requirement for 5.4 ha of E(g)(i) office employment land whilst only 3.95 ha is included within he proposed employment allocations. Due to not meeting minimum requirements and the lack of positive planning, office floorspace should be supported rather than limited by not including this type of floorspace within the definition of an employment use.

8.4 In order for the definition to be found sound, it should be expanded to additionally include E(g)(i) office floorspace regardless of whether a site is found within or outside of a settlement boundary.

9.0 CONCLUSION AND REQUESTED MODIFICATIONS

9.1 The analysis presented in this submission demonstrates that the Draft Rugby Local Plan (Regulation 19) is **unsound** in several respects. In particular:

- The employment land strategy does not provide sufficient flexibility to respond to economic growth or local market demand.
- The spatial distribution of employment allocations is heavily concentrated in the north-west of the Borough, leaving the Ryton-on-Dunsmore area without any new employment allocation despite significant housing growth.
- The proposed allocations provide only a very limited proportion of floorspace capable of accommodating small and medium-sized enterprises, despite SMEs comprising over 99% of businesses within the Borough.
- The site selection process does not appear to have consistently applied national policy in relation to the prioritisation of Grey Belt land.
- The reasons given for the exclusion of the Ryton Fields Farm site within the Stage 2 Site Assessment are not justified by the evidence and are inconsistent with national planning policy.

9.2 In order for the Local Plan to be found sound, it is therefore recommended that the Council modifies the Plan to include the allocation of the Ryton Fields Farm site for employment development. The site represents a suitable, available and achievable location capable of delivering approximately 63,000 sqm of employment floorspace, including a significant proportion of smaller units suitable for SMEs.

9.3 The allocation of Ryton Fields Farm would provide a more balanced spatial distribution of employment land, support the needs of the local business community and ensure the Local Plan is positively prepared, justified and consistent with national policy.

9.4 Given the evidence presented within these representations, the allocation of the Ryton Fields Farm site represents a proportionate and effective modification to the Draft Local Plan. The site would provide additional SME-focused employment floorspace, improve the spatial balance of employment provision across the Borough and ensure that the Plan includes a wider portfolio of deliverable employment sites capable of responding to changing market conditions.

Appendix 1 Executive Summary

[redacted]

Ryton Fields Farm

Regulation 19 Representation – Executive Summary

1. Introduction

Ryton Fields Farm comprises approximately 56 acres of land located adjacent to the A45 corridor between Coventry and Rugby.

This Executive Summary sets out the key reasons why the site should be reconsidered as a deliverable employment allocation within the emerging Rugby Borough Local Plan.

The site is:

- In single ownership;
- Independently valued on an existing use basis;
- Actively promoted by an experienced development partner;
- Commercially viable;
- Technically deliverable;
- Strategically located within an established employment corridor.

It represents a credible, market-backed opportunity capable of making a meaningful contribution to the Borough's employment land supply.

2. Strategic Location

The site occupies a highly accessible position:

- Immediately adjacent to the A45 dual carriageway;
- Direct connectivity to the A46 and M6;
- Located within the established A45 employment corridor;
- Positioned between the Coventry and Rugby labour markets.

Recent Department for Transport traffic data confirms that the A45 accommodates approximately 32,000 vehicles per day, including nearly 3,000 HGV movements, reinforcing its established freight and employment function.

For B2 and B8 uses, proximity to the strategic road network is a primary locational requirement. In commercial and operational terms, the site is well placed to accommodate employment development.

[redacted]

[redacted]

3. Employment Need and Market Demand

Independent commercial agents active within the Coventry and Warwickshire industrial market confirm:

- Continued undersupply of mid-sized B2 and B8 accommodation;
- Limited availability of freehold industrial opportunities;
- Ongoing demand along the A45 corridor.

Recent strategic allocations have predominantly served large-scale logistics operators. There remains a demonstrable gap in provision for flexible industrial development capable of serving regional businesses.

Ryton Fields Farm is capable of meeting this need and diversifying the Borough's employment land portfolio.

4. Availability and Delivery Structure

The site is held in single freehold ownership. The landowners have confirmed their willingness to bring the site forward for employment development.

The holding was independently valued in November 2025 at £4,000,000 on an existing use basis, confirming a clear commercial baseline and demonstrating informed landowner commitment.

Complex Development Projects Ltd (CDP) is engaged as development partner and has established a clear and realistic delivery strategy:

- Submission of outline planning application within 6–9 months of allocation;
- Disposal of the site with planning consent;
- Single-phase sale to an established regional or national industrial developer;
- Commencement of development within approximately 18–24 months of allocation.

This represents a commercially credible programme consistent with market practice for employment land delivery.

[redacted]

[redacted]

5. Technical Deliverability

Preliminary technical review confirms:

- Compliant vehicular access can be delivered from Wolston Lane;
- No third-party land is required;
- National Highways' recorded level of concern is Low;
- The site lies within Flood Zone 1;
- Ecological considerations are capable of mitigation through layout and buffering.

The site already accommodates established commercial activity, including lawful B2 and B8 uses operating from purpose-built structures accessed from Wolston Lane. Associated vehicular movements are therefore established.

Development would represent consolidation and formal allocation of an existing employment cluster rather than first introduction of industrial activity.

There are no identified abnormal infrastructure requirements that would prevent development.

Transport modelling, drainage strategy and ecological assessment will be undertaken in full at outline stage.

6. Green Belt / Grey Belt Context

Approximately 60% of the site has been provisionally identified as Grey Belt within the Council's Stage 2 assessment.

The site:

- Is contained by existing infrastructure, including the A45;
- Comprises established built form and hardstanding;
- Accommodates lawful employment uses;
- Sits within a strategic transport corridor.

The presence of existing development and operational commercial activity materially reduces the site's contribution to openness. In this context, allocation would represent rationalisation and consolidation of an established cluster rather than encroachment into undeveloped countryside.

The site therefore presents a logical and contained opportunity for employment growth without undermining the wider function of the Green Belt.

[redacted]

7. Scale of Opportunity

It is anticipated that approximately 30–35 acres could comprise net developable employment land following allowances for landscape buffers, drainage infrastructure and ecological mitigation.

At current market levels, consented employment land in comparable strategic roadside locations is achieving in the order of £700,000–£800,000 per acre.

This suggests potential gross land values in the region of £21 million–£28 million and delivery of approximately 600,000–700,000 sq ft of employment floorspace.

The scale of potential private investment and employment generation would make a meaningful contribution to the Borough's economic strategy and employment land supply.

8. Conclusion

Ryton Fields Farm satisfies the key tests of:

- **Availability** – single ownership and committed landowners supported by an independently confirmed existing use value baseline;
- **Achievability** – commercially viable and market supported;
- **Deliverability** – technically feasible and capable of progressing to outline submission within 6–9 months of allocation.

The site is not speculative in nature. It is independently valued, actively promoted and underpinned by a clear and realistic delivery programme.

There is no technical, ownership or commercial barrier preventing allocation and timely delivery.

In the event that additional employment capacity is required through the Examination process, Ryton Fields Farm represents a deliverable, market-supported and strategically located opportunity that should be reconsidered as a sustainable employment allocation within the Regulation 19 Local Plan.

Appendix 2 Bromwich Hardy Marketing Letter

BROMWICH HARDY
CHARTERED SURVEYORS
COMMERCIAL PROPERTY ADVISORS

Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR

[redacted]

Dear Sir/Madam,

Re: Ryton Fields Farm – Support for Employment Allocation (Regulation 19)

We write in support of the proposed allocation of Ryton Fields Farm for employment use within the emerging Rugby Borough Local Plan.

Bromwich Hardy is an established commercial property consultancy active across Coventry, Warwickshire and the wider Midlands region, advising developers, landowners, occupiers and investors in the industrial and logistics sectors.

Based on our market knowledge and current transactional activity, we consider there to be a continued requirement for additional employment land within the borough, particularly sites capable of delivering flexible B2 and B8 accommodation in well-connected strategic locations.

Strategic Corridor Logic

Ryton Fields Farm occupies a prominent position adjacent to the A45 corridor between Coventry and Rugby, with direct connectivity to the A46 and M6. From a commercial perspective, this represents a highly desirable location for industrial and logistics development.

Employment sites in strategic roadside locations of this nature are attractive to a broad spectrum of occupiers, particularly those requiring efficient regional distribution and strong access to the motorway network. In our experience, accessibility to the strategic road network is a primary driver of demand for modern industrial uses.

Market Demand and Absorption

Whilst significant logistics development has occurred within Rugby, much of this has focused on larger-scale national distribution units. There remains ongoing demand for:

- Mid-sized industrial and warehouse units;
- Flexible B2 space;
- Opportunities capable of phased delivery;
- Sites suitable for speculative development supported by regional developers and institutional capital.

We are confident that, subject to allocation and planning consent, Ryton Fields Farm would attract meaningful developer interest and could be brought forward in a commercially viable and phased manner.

Deliverability

The scale, configuration and strategic location of the site provide the flexibility necessary to respond to changing market requirements. In our professional opinion, the site is capable of delivering a marketable employment scheme and would contribute positively to the borough's economic growth strategy.

Conclusion

Given its strategic position, commercial viability and ability to meet identifiable market demand, we support the inclusion of Ryton Fields Farm as an employment allocation within the Regulation 19 Local Plan.

Yours faithfully,

[redacted]

[redacted]

[redacted]

[redacted]

Appendix 3 Holt Marketing Letter

Our Ref: NPH/DS/03032026.01

3 March 2026

Rugby Borough Council
Town Hall
Evreux Way
RUGBY CV21 2RR

Dear Sir/Madam

RYTON FIELDS FARM – REGULATION 19 REPRESENTATION (EMPLOYMENT ALLOCATION)

We write in support of the proposed allocation of Ryton Fields Farm for employment use within the emerging Rugby Borough Local Plan.

Holt Commercial is an established commercial property agency operating across Coventry and Warwickshire, advising occupiers, developers and investors within the industrial and logistics sectors. Based on our active involvement in the local market, we consider there to be a clear and ongoing shortfall of deliverable employment land within the borough, particularly for B2 and B8 uses.

Recent strategic allocations within Rugby have predominantly catered for large-scale logistics operators. However, there remains a pronounced lack of:

- Mid-sized industrial accommodation (approximately 2,000 - 10,000 sq m);
- Flexible B2/B8 premises for growing regional businesses;
- Freehold opportunities for owner-occupiers;
- Strategically located sites capable of serving both Rugby and Coventry markets.

We regularly receive enquiries from occupiers seeking growth space along the A45 corridor who are unable to secure suitable accommodation within existing allocations. The limited availability of appropriately sized employment land is constraining business expansion and, in some cases, displacing occupiers outside the borough.

Strategic Location and Accessibility

Ryton Fields Farm occupies a highly accessible position adjacent to the A45 dual carriageway, providing immediate connectivity to the A46, M6 and wider strategic road network. From a commercial perspective, this level of accessibility is a significant advantage and aligns with the operational requirements of modern B2 and B8 occupiers.

While the site lies outside the immediate built-up area, employment development in strategic corridor locations such as this is consistent with market demand and operational efficiency. For industrial and logistics uses in particular, direct access to primary road infrastructure is often of greater commercial relevance than proximity to town centres.

Deliverability and Market Attractiveness

In our professional opinion, subject to allocation and planning consent, the site would be attractive to both developers and occupiers. The scale of the site allows for flexibility in unit configuration and phasing, enabling delivery of a range of employment typologies in response to market demand.

Given the current supply-demand imbalance in the local industrial market, we consider Ryton Fields Farm to be a viable and deliverable employment location capable of making a meaningful contribution to the borough's economic objectives.

Conclusion

In light of sustained occupier demand, constrained supply and the site's strong strategic accessibility, we support the inclusion of Ryton Fields Farm as an employment allocation within the Rugby Borough Local Plan.

Yours faithfully

[redacted]

Appendix 4 Deliverability and Programme Statement

[redacted]

Complex Development Projects Ltd
Deliverability and Programme Statement

Ryton Fields Farm – Regulation 19 Representation

---

1. Introduction

This statement is prepared by Complex Development Projects Ltd ("CDP") in its capacity as development partner to the landowners of Ryton Fields Farm and confirms our intention and capability to deliver the site in accordance with the programme set out below.

Its purpose is to demonstrate that the site is:

- Available
- Achievable
- Deliverable within a realistic commercial timeframe

In accordance with the National Planning Policy Framework tests of soundness.

---

2. Land Ownership and Availability

Ryton Fields Farm extends to approximately 56 acres and is held in single freehold ownership.

The landowners have confirmed:

- Their willingness to bring the site forward for employment development;
- Engagement with CDP as development partner;
- Commitment to progressing allocation and planning.

The holding was independently valued in November 2025 at £4,000,000 on an existing use basis, confirming a clear commercial baseline. The site is held under registered freehold title with no known restrictive covenants preventing development.

There are no legal, ownership or operational constraints that would prevent development.

The site is therefore fully available for delivery within the plan period.

[redacted]

[redacted]

3. Development Strategy

CDP's agreed strategy is to:

1. Secure allocation within the Local Plan;
2. Prepare and submit an outline planning application for employment uses (primarily B2 and B8, with appropriate Class E uses where justified);
3. Obtain implementable outline planning permission;
4. Market the consented site in a single phase to a regional or national industrial developer;
5. Facilitate early commencement of development following disposal.

CDP's intention is to dispose of the site with outline planning consent in place, ensuring:

- Certainty for purchasers;
- Accelerated delivery;
- Reduced planning risk for the market.

This represents a conventional and proven route for employment land delivery within the Coventry and Warwickshire market.

4. Technical Deliverability

Preliminary technical review confirms:

- Vehicular access can be delivered from Wolston Lane via a compliant ghost island right-turn arrangement;
- No third-party land is required to facilitate access;
- The Stage 2 Site Assessment records National Highways' level of concern as Low;
- The site lies within Flood Zone 1;
- Ecological considerations are capable of mitigation through design and buffering;
- There are no identified abnormal infrastructure requirements.

The site currently accommodates established commercial activity, including lawful B2 and B8 uses operating from purpose-built structures accessed from Wolston Lane. Associated vehicular movements are therefore already established.

The proposal represents consolidation and formal allocation of an existing employment cluster rather than the first introduction of industrial activity. This materially reduces the delivery risk profile typically associated with new employment allocations.

Transport modelling, ecological assessment and drainage strategy will be undertaken in full at planning application stage.

There is no technical evidence to suggest the site is undeliverable.

[redacted]

5. Programme

The anticipated programme following allocation is as follows:

0–6 months post-allocation
- Commission updated technical surveys;
- Undertake pre-application engagement with the Local Planning Authority;
- Finalise outline masterplan and supporting documentation.

6–9 months post-allocation
- Submission of outline planning application.

9–15 months post-submission
- Determination period including statutory consultation.

Immediately following resolution to grant
- Targeted marketing campaign to regional and national industrial developers.

Within 18–24 months of allocation
- Site disposal with outline consent;
- Commencement of development by purchaser.

This programme is consistent with industry norms for employment land delivery and reflects a commercially credible pathway from allocation to implementation.

6. Scale of Opportunity

Based on the gross site area of approximately 56 acres, it is anticipated that approximately 30–35 acres could comprise net developable employment land following allowances for landscape buffers, drainage infrastructure and ecological mitigation.

At current market levels along the A45 corridor, consented employment land is achieving in the order of £700,000–£800,000 per acre, subject to specification and planning certainty.

On a conservative basis, this suggests potential gross land values in the region of £21 million–£28 million and delivery of approximately 600,000–700,000 sq ft of employment floorspace.

This represents a significant private sector investment opportunity within the Borough, capable of generating substantial employment, construction activity and long-term economic benefit.

7. Market Deliverability

Independent commercial agents active within the Coventry and Warwickshire industrial market confirm:

- Continued undersupply of mid-sized B2 and B8 accommodation;
- Ongoing demand along the A45 corridor;
- Commercial confidence in the site's strategic positioning.

The site's scale, configuration and frontage to the strategic road network make it suitable for single-phase disposal to an established industrial developer capable of delivering at pace.

Given current market conditions, CDP considers the site capable of being brought forward promptly following consent.

8. Conclusion

Ryton Fields Farm satisfies the NPPF tests of:

Availability – single ownership and committed landowners supported by a confirmed existing use value baseline;

Achievability – commercially viable with demonstrable market demand and a clear disposal strategy;

Deliverability – technically feasible, free from abnormal constraints, and capable of progressing to outline submission within 6–9 months of allocation.

The site is not speculative in nature. It is independently valued, actively promoted and supported by an experienced development partner with a defined and realistic delivery programme.

There is no technical, ownership or commercial barrier preventing allocation and timely delivery.

In the event that additional employment capacity is required through the Examination process, Ryton Fields Farm represents a deliverable and market-supported opportunity capable of being brought forward without delay.

Appendix 5 Land Availability Statement

[redacted]

[redacted]

[redacted]

3rd March 2026

Rugby Borough Council,

Town Hall,

Evreux Way,

Rugby, CV21 2RR

Dear Sir/Madam,

Re: Ryton Fields Farm, Ryton-on-Dunsmore

Land Availability Statement (Regulation 19 Representation)

We write as the freehold owners of Ryton Fields Farm, Ryton-on-Dunsmore (approximately 56 acres), in support of its promotion for employment development within the emerging Rugby Borough Local Plan.

We confirm the following:

1. Ownership and Control

We are the freehold owners of the site and have full authority to promote the land for development.

2. Willingness to Develop

We are willing landowners and confirm that the site is available for employment development. There are no legal, operational or ownership constraints that would prevent the land from being brought forward.

3. Development Partner

We are working with *Complex Development Projects Ltd (CDP)* as our development partner to promote the site through the Local Plan process and to pursue outline planning permission for employment uses (including B2, B8 and appropriate Class E uses).

[redacted]

Ryton Fields Farm
Wolston Lane
Ryton-on-Dunsmore
COVENTRY CV8 3ES

[redacted]

4. Deliverability

We are committed to progressing the site in a timely manner, including the preparation of technical studies and submission of a planning application, subject to allocation within the Local Plan.

5. Timescale

Subject to allocation and planning consent, the site could be brought forward for development within a normal commercial timescale.

Ryton Fields Farm occupies a sustainable and strategically accessible location adjacent to the A45 corridor, and we are committed to working constructively with the Council to facilitate its delivery as a high-quality employment scheme.

We respectfully request that the site be given full consideration as a deliverable and available employment allocation within the Regulation 19 Local Plan.

Yours faithfully,

[redacted]

[redacted]

Appendix 6 Planning History & Established Commercial Use Statement

[redacted]

Planning History & Established Commercial Use Statement

Ryton Fields Farm

Ryton Fields Farm has a longstanding and evolving planning history demonstrating a transition from purely agricultural use toward mixed agricultural and commercial employment activity.

Key milestones include:

- 2003 – Change of use of agricultural building to B8 warehouse/distribution use
- 2018 – Change of use of agricultural building to B2 (commercial servicing and repairs)
- 2019 – Retrospective permission for CHP installation
- Multiple prior approvals for agricultural buildings and storage
- 2024–2025 continued development including agricultural and ancillary uses

The site therefore:

- Contains established commercial floorspace
- Accommodates lawful B2/B8 activity
- Has experienced consistent operational vehicle movements
- Has not been a purely undeveloped greenfield holding for over two decades

This established employment footprint supports the site's suitability for formal allocation for employment use.

[redacted]

Appendix 7 Ecology Statement

[redacted]

Ecology Position Statement

Ryton Fields Farm – Regulation 19 Representation

The Stage 2 Site Assessment identifies medium ecological constraints arising from the presence of a Local Wildlife Site (LWS) within the wider landholding and potential hydrological pathways to Brandon Marsh SSSI.

It is acknowledged that ecological matters will require detailed assessment at outline planning stage. However, the identified constraints arise primarily from proximity rather than from evidence of direct ecological harm or confirmed protected species presence.

The site comprises an established farmstead and employment cluster, including longstanding built form, hardstanding and operational commercial activity. Development proposals would be focused on consolidating and rationalising this developed area rather than extending into undisturbed ecological corridors.

The site lies within Flood Zone 1 and there is no evidence of fluvial flood risk. Any future development would incorporate:

- A Preliminary Ecological Appraisal and targeted species surveys as required;
- Defined ecological buffers to any Local Wildlife Site areas;
- Sustainable drainage systems designed to prevent adverse hydrological connectivity to Brandon Marsh SSSI;
- Retention and reinforcement of boundary vegetation;
- Delivery of measurable Biodiversity Net Gain in accordance with statutory requirements.

With appropriate layout, buffering and drainage design, there is no technical basis at this stage to conclude that development would result in adverse effects on Brandon Marsh SSSI or the Local Wildlife Site.

Ecological considerations are capable of being fully assessed and appropriately mitigated through the planning application process and do not render the site undeliverable.

[redacted]

Appendix 8 Highways Deliverability Summary

[redacted]

HIGHWAYS DELIVERABILITY SUMMARY

Ryton Fields Farm – Access and Transport Deliverability Statement

1. Introduction

This statement addresses transport matters raised within the Stage 2 Site Assessment and confirms that highways considerations do not present a barrier to allocation of Ryton Fields Farm for employment development.

The site already accommodates established commercial activity, including lawful B2 and B8 uses accessed from Wolston Lane. Vehicular movements associated with employment activity are therefore already an established characteristic of the site.

This note demonstrates that future development can be delivered in accordance with highway design standards and without abnormal infrastructure requirements.

2. Strategic Road Network Context

The site is located immediately adjacent to the A45 dual carriageway, a principal east–west strategic corridor connecting Coventry, Rugby and the wider motorway network.

Latest Department for Transport traffic count data (Warwickshire, 2024) records:

- 32,064 motor vehicles per day;
- 2,954 HGV movements per day;
- HGVs representing approximately 9% of total traffic flow.

This confirms that:

- The A45 functions as an established freight and logistics corridor;
- Heavy goods vehicle movements are a defining characteristic of the route;
- Employment uses, including B2 and B8, are contextually appropriate in transport terms.

The site benefits from immediate connectivity to:

- A46 (approximately 3 km);
- M6 (J2 and J4 via A46);
- M45 (via A45 eastbound).

This level of accessibility aligns directly with the operational requirements of modern industrial and logistics occupiers.

[redacted]

[redacted]

3. Vehicular Access Feasibility

An Access Appraisal (WA5331-1PD) confirms that:

- A compliant vehicular access can be provided from Wolston Lane;
- A ghost island right-turn lane arrangement is feasible;
- The design can meet DMRB CD123 geometric standards;
- Appropriate visibility splays can be achieved;
- No third-party land is required;
- Detailed junction capacity modelling would be undertaken at planning application stage.

Importantly, the appraisal demonstrates that a standards-compliant access can be delivered without abnormal engineering works, land assembly complications or strategic infrastructure intervention.

The access strategy is therefore technically feasible and deliverable within normal development management parameters.

4. Strategic Highway Impact

The Stage 2 Site Assessment identifies the potential requirement for modelling of the A45 and associated junctions at application stage.

However, the assessment records the current level of concern in relation to strategic highway mitigation as **Low**.

This indicates that:

- No fundamental capacity constraints have been identified;
- No severe impact threshold concerns have been raised;
- Mitigation requirements, if necessary, are anticipated to fall within conventional development management responses.

Traffic modelling and mitigation design are standard components of an outline planning application and do not represent allocation-level constraints.

There is no evidence at this stage to suggest that development would give rise to severe residual cumulative impacts.

[redacted]

5. Sustainable Transport

In addition to strong strategic road connectivity, the site benefits from:

- An existing shared pedestrian and cycle route along Wolston Lane;
- Existing bus services (25, 25A and 25X) connecting Coventry and Rugby;
- Opportunities to enhance pedestrian crossings at Ryton Roundabout;
- Potential to introduce improved bus stops and service enhancements.

Such measures can be secured through planning obligations and incorporated into a comprehensive Transport Strategy at outline stage.

The scale and nature of employment development proposed are consistent with the site's strategic road location and freight function.

6. Conclusion

Having regard to:

- Immediate adjacency to a principal freight corridor;
- Established commercial vehicle movements;
- Feasible and standards-compliant access design;
- No third-party land requirements;
- Low recorded concern from National Highways;
- Scope for proportionate mitigation at application stage;

Highways considerations do not present a barrier to allocation.

The site's location adjacent to the A45 strategic road network positively supports its suitability for employment development, particularly B2 and B8 uses.

Bedford
Planning | Research & Analysis | Transport & Infrastructure
[redacted]

Bristol
Planning | Transport & Infrastructure
[redacted]

Liverpool
Planning
[redacted]

London
Planning
[redacted]

Nottingham
Planning | Transport & Infrastructure
[redacted]

Rugby
Planning
[redacted]

Sheffield
Planning | Research & Analysis | Transport & Infrastructure
[redacted]

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 & Mrs	[redacted]
First Name	[redacted]	[redacted]
Last Name	[redacted]	[redacted]
Job Title (where relevant)		[redacted]
Organisation (where relevant)		[redacted]
Address Line 1		[redacted]
Line 2		[redacted]
Line 3		[redacted]
Line 4		
Post Code		[redacted]
Telephone Number		[redacted]
E-mail Address (where relevant)		[redacted]

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

Name or Organisation:

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

Local Plan Paragraph	Glossary	Local Plan Policy		Policies Map	
Site ID	2				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.

Please see **Section 8.0 Additional Soundness Concerns** in attached report (Rugby Local Plan Regulation 19 Consultation Response – DLP Ryton Fields Farm).

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see **Section 8.0 Additional Soundness Concerns** in attached report (Rugby Local Plan Regulation 19 Consultation Response – DLP Ryton Fields Farm).

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

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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)	X	**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:

DLP Planning Ltd have significant experience both in plan making and local plan examinations, especially in terms of the tests of soundness so their experience on these matters will be of assistance to the Inspectors.

The soundness issues raised in this objection are not stand alone but must be regarded as part of a wider objection to the Local Plan.

In order to full demonstrate the arguments raised in this objection and to appropriately test the soundness of the Local Plan, this will require attendance of suitably knowledgeable persons at the hearings.

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.

N/A

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

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	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 & Mrs	[redacted]
First Name	[redacted]	[redacted]
Last Name	[redacted]	[redacted]
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Line 3		[redacted]
Line 4		
Post Code		[redacted]
Telephone Number		[redacted]
E-mail Address (where relevant)		[redacted]

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	E2	Policies Map	
Site ID	2				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.

Please see **Section 5.0 - Policy E2 Employment Development** in attached report (Rugby Local Plan Regulation 19 Consultation Response – DLP Ryton Fields Farm).

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see **Section 5.0 - Policy E2 Employment Development** in attached report (Rugby Local Plan Regulation 19 Consultation Response – DLP Ryton Fields Farm).

(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)	X	**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:

DLP Planning Ltd have significant experience both in plan making and local plan examinations, especially in terms of the tests of soundness so their experience on these matters will be of assistance to the Inspectors.

The soundness issues raised in this objection are not stand alone but must be regarded as part of a wider objection to the Local Plan.

In order to full demonstrate the arguments raised in this objection and to appropriately test the soundness of the Local Plan, this will require attendance of suitably knowledgeable persons at the hearings.

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.

N/A

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Representation Form for Local Plans

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Name of the Local Plan to which this representation relates: Rugby Borough Council Proposed Submission Local Plan

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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.

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Part A

	1. Personal Details*	2. Agent's Details (if applicable)
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Title	Mr & Mrs	[redacted]
First Name	[redacted]	[redacted]
Last Name	[redacted]	[redacted]
Job Title (where relevant)		[redacted]
Organisation (where relevant)		[redacted]
Address Line 1		[redacted]
Line 2		[redacted]
Line 3		[redacted]
Line 4		
Post Code		[redacted]
Telephone Number		[redacted]
E-mail Address (where relevant)		[redacted]

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	E3	Policies Map	
Site ID	2				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.

Please see **Section 6.0 – Policy E3 Rural Economy** in attached report (Rugby Local Plan Regulation 19 Consultation Response – DLP Ryton Fields Farm).

(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.

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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)	X	**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?

Local Plan Paragraph		Local Plan Policy	S3	Policies Map	
Site ID	2				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.
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Please see **Section 3.0 – Policy S3 Strategy for Employment Land** in attached report (Rugby Local Plan Regulation 19 Consultation Response – DLP Ryton Fields Farm).

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see **Section 3.0 - Policy S3 Strategy for Employment Land** in attached report (Rugby Local Plan Regulation 19 Consultation Response – DLP Ryton Fields Farm).

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	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

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Post Code		[redacted]
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E-mail Address (where relevant)		[redacted]

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	S7	Policies Map	
Site ID	2				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.
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Please see **Section 4.0 – Policy S7 Employment Allocations** in attached report (Rugby Local Plan Regulation 19 Consultation Response – DLP Ryton Fields Farm).

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see **Section 4.0 – Policy S7 Employment Allocations** in attached report (Rugby Local Plan Regulation 19 Consultation Response – DLP Ryton Fields Farm).

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

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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?

Local Plan Paragraph		Local Plan Policy		Policies Map	
Site ID	ID 2 – Site Assessment Report				

4. Do you consider the Local Plan:

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Please see **Section 7.0 – Stage 2 Site Assessment Report** in attached report (Rugby Local Plan Regulation 19 Consultation Response – DLP Ryton Fields Farm).

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

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Please see **Section 7.0 – Stage 2 Site Assessment Report** in attached report (Rugby Local Plan Regulation 19 Consultation Response – DLP Ryton Fields Farm).

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

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[redacted]

From: [redacted]
Sent: 11 March 2026 16:50
To: Local Plan
Subject: Proposed Submission Consultation
Attachments: Rugby Local Plan Regulation 19 Consultation Response - DLP Ryton Fields Farm.pdf; Representations Form - Glossary - DLP Ryton Fields Farm.pdf; Representations Form - Policy E2 - DLP Ryton Fields Farm.pdf; Representations Form - Policy E3 - DLP Ryton Fields Farm.pdf; Representations Form - Policy S3 - DLP Ryton Fields Farm.pdf; Representations Form - Policy S7 - DLP Ryton Fields Farm.pdf; Representations Form - Site Assessment - DLP Ryton Fields Farm.pdf

Categories: [redacted] dealing with

Dear Sir/Madam,

Please find attached our response to the Regulation 19 Consultation on the Proposed Submission Local Plan, submitted on behalf of S & D Postlethwaite.

I would be grateful if you could confirm receipt of this submission.

Thanks,

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Established in 1991 | Employee Owned Trust

Research & Analysis

[redacted] s a limited company registered in England and Wales. Registered number: 2604863, Registered office: [redacted]

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