

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*

**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.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Jonathan"/>	<input type="text" value="Nick"/>
Last Name	<input type="text" value="Dawes"/>	<input type="text" value="Billington"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>
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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	CL1	Policies Map	
Site ID	Site ID: 253				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X ¹	No	
(2) is Sound	Yes	X ¹	No	
(3) complies with the Duty to co-operate	Yes	X ¹	No	

NB 1 – subject to the changes proposed

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.

See covering letter

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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)

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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	EN5	Policies Map	X
Site ID	Site ID: 253				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X ¹	No	
(2) is Sound	Yes	X ¹	No	
(3) complies with the Duty to co-operate	Yes	X ¹	No	

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Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	EN6	Policies Map	X
Site ID	Site ID: 253				

4. Do you consider the Local Plan:

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(2) is Sound	Yes	X ¹	No	
(3) complies with the Duty to co-operate	Yes	X ¹	No	

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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	EN7	Policies Map	
Site ID	Site ID: 253				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X ¹	No	
(2) is Sound	Yes	X ¹	No	
(3) complies with the Duty to co-operate	Yes	X ¹	No	

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Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	H1	Policies Map	
Site ID	Site ID: 253				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X ¹	No	
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Name or Organisation:

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Site ID	Site ID: 253				

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Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

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

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We believe that the points we have set out will need additional reiteration, given detailed nature of the points we have made, the range of other proposals that are likely to have similar comments and the range of parties involved, to ensure a joined-up approach to the delivery of the policy.

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

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:

<https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official use
only)

**Name of the Local Plan to which
this representation relates:**

Rugby Borough Council Proposed Submission
Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 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*

**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.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Jonathan"/>	<input type="text" value="Nick"/>
Last Name	<input type="text" value="Dawes"/>	<input type="text" value="Billington"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>
Address Line 1	<input type="text" value=""/>	<input type="text" value=""/>
Line 2	<input type="text" value=""/>	<input type="text" value=""/>
Line 3	<input type="text" value=""/>	<input type="text" value=""/>
Line 4	<input type="text" value=""/>	<input type="text" value=""/>
Post Code	<input type="text" value=""/>	<input type="text" value=""/>
Telephone Number	<input type="text" value=""/>	<input type="text" value=""/>
E-mail Address (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>

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	Site ID: 253	Policies Map	X
Site ID	Site ID: 253				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X ¹	No	
(2) is Sound	Yes	X ¹	No	
(3) complies with the Duty to co-operate	Yes	X ¹	No	

NB 1 – subject to the changes proposed

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.

See covering letter

(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.

See covering letter

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

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

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

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We believe that the points we have set out will need additional reiteration, given detailed nature of the points we have made, the range of other proposals that are likely to have similar comments (particularly the highway/connectively points) and the range of parties involved, to ensure a joined-up approach to the delivery of the policy.

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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<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>



Representation Response

Rugby Borough Council – Regulation 19 Local Plan Consultation

Prepared on behalf of Tritax Park Rugby West Limited

Prepared by:

SLR Consulting Limited

Mountbatten House, 1 Grosvenor Square,
Southampton SO15 2JU

SLR Project No.: 416.066260.00001

11 March 2026

Revision: 02

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
01	3 March 2026	AWM	NB	NB
02	11 March 2026	AWM	NB	NB



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Appendix B.....	Detailed Assessment of Site ID 253: Lawford Fields Farm
Appendix C.....	Proposed tracked changes to policy Site ID 253: Lawford Fields Farm
Appendix D.....	Regulation 18 Representation

1.0 Introduction

- 1.1 This statement has been prepared by SLR Consulting Ltd on behalf of Tritax Park Rugby West Limited (“Tritax”) in respect of the Rugby Borough Local Plan 2025–2042 Regulation 19 Consultation. This representation focuses on the proposed housing allocation at Long Lawford Fields Farm for 250 new homes (Site ID 253).
- 1.2 By way of background, Tritax has an interest in Land at Long Lawford Fields Farm (‘the Site’), which is located to the south of Long Lawford and immediately west of Rugby, which is a proposed allocation for 250 new homes. The location of the site is shown in Appendix A.



2.0 Site Selection

- 2.1. Tritax welcomes and supports the council's allocation for 250 new homes on land known as Lawford Fields Farm.
- 2.2. These representations concentrate on the proposed allocation policy (Site ID: 253), but we also comment, where necessary, on other policies that affect the proposal on the Site.
- 2.3. Tritax supports and agrees with the allocation of 250 homes and believes that this represents an efficient use of the site (save the comments we have made further below). Policy S6 includes the allocation of the site for 250 homes, which is fully supported, although we propose that this is clarified as 'approximately 250 homes' to ensure there is some flexibility on the final numbers (both up and down). This then aligns with the 'circa 250' dwellings indicated on the site allocation pro-forma.
- 2.4. Tritax reaffirms that the Site is in a sustainable location, where it is both within easy access of Rugby town centre and also Long Lawford to the north and Cawston. Specifically, we support Policy S1 and the inclusion of Long Lawford as a Category 2 settlement/"Main rural settlement". The site, and Long Lawford, are within easy sustainable reach of Rugby town centre by foot, cycle and bus, where there is an existing bus stop and a footway/cycleway adjacent to the Site.
- 2.5. Whilst there are some matters of detail within the Green Belt review that we disagree with, Tritax are nonetheless pleased that the overall conclusion on the Green Belt Review, supported by our own Green Belt Review assessment submitted in summer 2025 (see previous reps at Appendix D), is that land here is suitable for removal from the Green Belt to assist in meeting RBC's acute housing needs.
- 2.6. The policy for Site ID: 253 Long Lawford Fields Farm sets out several bullet points setting out detailed requirements for the Site's development. We set out below, and at Appendix B, our commentary on those bullet points we request are changed. We also include our proposed tracked changes to the policy text at Appendix C.
- 2.7. In respect to the first bullet point, we question why the southern part of the residential allocation remains in the green belt. Whilst the open space/recreation uses proposed on this part of the site can sometimes be compatible with the green belt designation, this will limit the extent of works that can developed to support these uses, such as accommodation relating to the allotments and storage and changing facilities relating to the playing fields. In addition, any play equipment, hardstanding etc will also need to be assessed against green belt policy, adding an unnecessary policy burden, and potentially resulting in delay to the delivery of the scheme.
- 2.8. By retaining the green belt designation on this part of the site, this makes the use of this land overcomplicated, which will unnecessarily delay and potentially prevent desired



development (within the definition of the Act) for future occupiers and users of this land and we therefore object to this and propose that this part of the site is designated as open space instead.

- 2.9. In addition to the above point, there are several bullet points relating to sustainable connectivity between the site and Cawston to the south of the A4071 and north to Long Lawton. Whilst the delivery of transport and highway improvements is supported in principle to further enhance the sustainability of the site and surrounding area, the level of detail within the policy wording is unusually high and provides insufficient flexibility. For example, in the event a scheme is funded more quickly from elsewhere or, through further transport work at application stage, alternative equivalent improvements are identified.
- 2.10. We have appended (Appendix B) a detailed assessment of each bullet point, along with our comments and proposed changes. As stated above, we also include a fully tracked version of the policy text for the site at Appendix C.
- 2.11. However, overall, we believe the proposed details set out in the policy are too inflexible and could delay the delivery of the site and the new homes needed in Rugby. The precise works required can be better secured in detail at planning application stage.
- 2.12. We propose that a more simplified policy should be used, as we have set out (see Appendices B and C). This will ensure the overall aim of the policy, as currently written, will still be achieved and delivered, but the detail of how that is achieved can be left to the planning application to determine when all the technical information is available.

Other Policies

Policy H1: Housing Mix

- 2.13. The table at paragraph 6.1 includes for an element of social or affordable rent for over 65s. However, where there is clear guidance at Policy H2 as to the mix of social rent and shared ownership (70/30), there is no guidance how the rented element should be split between over and under 65-year-olds. As such, clarity is required as to what would be sought on this policy requirement before further comment can be made.

Policy H7: Housing Standard

- 2.14. Whilst Tritax supports in principle the provision of higher numbers of accessible units and is not averse to aiming to achieve M4(2) on as many plots as feasible, they are concerned that the current wording of policy H7 is too inflexible and does not consider the potential knock-on effects in terms of the efficient use of the site. By way of example, current M4(2) requirements would necessitate larger car parking spaces, likely larger building footprints and level access to every property, which in turn could have implications for site capacities and design, resulting in squeezed space for other important policy aspirations such as increased tree cover, as well as potentially having viability implications. The



supporting text at 6.25 is noted but is still deemed too restrictive and in any case is not then translated into the policy wording.

- 2.15. We also note the draft NPPF sets out at Policy HO5 that “requirements should reflect local levels of need, and should ensure that at least 40% of new housing delivered over the course of the plan”. Policy H7 creates a far higher burden on new development and does not match the local levels of need. It is suggested wording to the effect of ‘where technically and viably feasible’ is added to the policy wording.

Policy CL1: Net Zero buildings.

- 2.16. This policy goes beyond building regulations and has not been justified. A Court of Appeal judgment from July 2025 (R (Rights: Community: Action Ltd) v Secretary of State for Housing, Communities and Local Government [2025] EWVA Civ 990) confirmed that, whilst local authorities can set a higher requirement, this needs to be justified and viable. We do not believe that this policy has been justified and such a high requirement could affect the viability of the development.
- 2.17. The SA highlights that viability for higher levels of sustainability is often a problem, but the SA somehow concludes that this policy has a “neutral effect”. We do not agree with this conclusion and do not believe the viability issues have been sufficiently considered.

Policy EN5: Biodiversity Net Gain

- 2.18. We comment that the BNG hierarchy is already expressed in national policy and, as the NPPF sets out, shouldn’t be replicated. We would also note that it is the Government’s clear intention that this will be included as a national Development Management policy, as can be seen from the recent draft consultation. As such, this should be removed from the policy.

Policy EN6: Canopy Cover

- 2.19. This policy requires the final development scheme to have a 20% increase in tree canopy cover. Whilst the policy aims are laudable, this has the potential to make sites unviable.
- 2.20. There will need to be a sufficient buffer for new and existing trees. For new trees, this will need to be sufficient for future growth. This will likely result in a clash with BNG requirements, where there will be a double counting of land use, particularly where the trading rules apply to predominantly open Green Field sites where there may be minimal tree loss as a result of the development.
- 2.21. This will likely have an effect on the number of homes that can be delivered and therefore the viability of the sites and their capacity.
- 2.22. It is proposed that policy EN6 should therefore be removed to reflect the BNG that needs to be delivered. If it is not to be removed, then an alternative approach would be to amend the policy to require specific net gain in trees (including potentially specifying minimum sizes) which would in our view be more effective at balancing the need for new homes, making the most efficient use of the site, and improving environmental outcomes.
- 2.23. In respect to canopy cover, Tritax believes this is already being achieved by the NPPF’s introduction of street trees, which strikes a balance of development needs, open space and BNG requirements and new trees being additionally properly considered.



2.24. If the policy is to remain, criteria B should also be clarified to make it clear that it is the existing 'net' level of canopy cover that should be retained. Whilst we do not think it is its intention, the current policy wording could be inferred to mean no existing tree canopy can be lost, which is unrealistic, for example where some loss is required to achieve access.

Policy EN7: Flood Risk

- 2.25. We note that the policy does not reflect the latest government policy, as set out in the PPG. Specifically, where a site has been the subject of a SFRA, as in the case of the allocated site, including this site, a Sequential Test is not usually required (unless there are changes to national policy). As such this should be made clear in the policy text.
- 2.26. In addition, in relation to surface water, where post-mitigation measures can mitigate any impacts, this should be accounted for before the decision to apply the sequential test is made. As such this should be made clear in the policy text.



3.0 Conclusion

- 3.1. Tritax fully supports the Rugby Borough Local Plan and proposed allocation at Site ID: 253 – Lawford Fields Farm for 250 homes.
- 3.2. Tritax has set out some practical comments on the policy relating to this allocation and how it can be improved to ensure the delivery of these much needed 250 homes, alongside some constructive commentary of some other policies which have potential implications for the site’s development.
- 3.3. Overall, Tritax supports the site’s allocation and confirms the sustainability of the Site, given its location adjacent to Long Lawford, a Category 2 settlement/“Main rural settlement” and its proximity to Rugby town centre, which is accessible from the site by sustainable means including by foot, cycle and bus.





Appendix A Lawford Fields Farm, Long Lawford: Site Location Plan

Representation Response

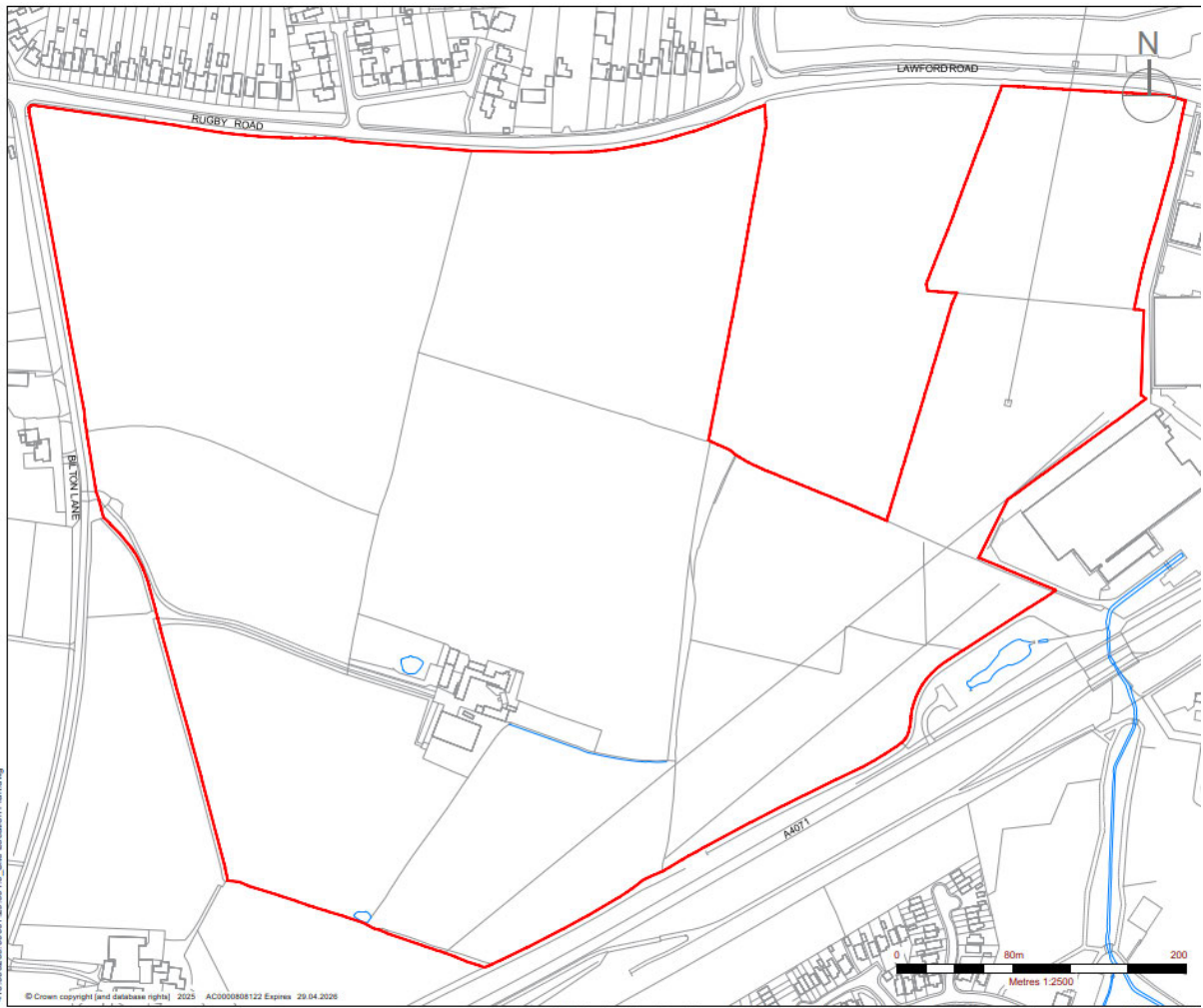
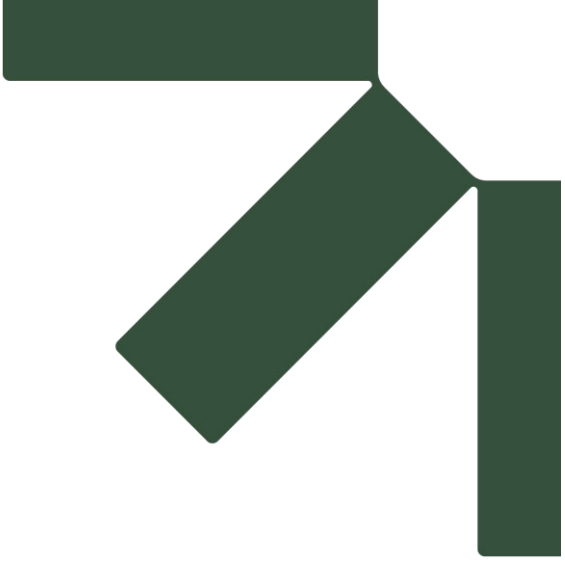
Rugby Borough Council – Regulation 19 Local Plan Consultation

Tritax Park Rugby West Limited

SLR Project No.: 416.066260.00001416.066260.00001

11 March 2026

Representation Response





Appendix B Detailed Assessment of Site ID253: Lawford Fields Farm

Representation Response

Rugby Borough Council – Regulation 19 Local Plan Consultation

Tritax Park Rugby West Limited

SLR Project No.: 416.066260.00001416.066260.00001

11 March 2026

Rugby Policy Comments

Long Lawford Fields Farm

Site ID: 253

Allocation for 250 homes

LP Development Requirements	SLR Comments	Action
<p>1. The Southern part of the site is not removed from the Green Belt. This part of the site shall be used for public recreational uses, for example sport pitches with a community use agreement, allotments or other public open space.</p>	<p>We do not believe it is a good idea, at face value, to leave the southern part for the site in the GB. Whilst some of these uses are acceptable/compatible use in the GB, this could be restrictive in the future. It would be better to remove the land from the green belt and designate it as open space as part of the site allocation policy which would provide a similar level of protection whilst providing flexibility for different open space uses.</p>	<p>Remove the open spaces element of the allocation from the green belt also. See proposed policy text changes at Appendix C.</p>
<p>2. The development of the site shall create a safe walking and cycling route linking the site with Cawston/Bilton to provide a safe walk to school route to Bilton School and Henry Hinde Juniors. The route should include a controlled crossing point or bridge over the A4071.</p>	<p>We believe that it is too early in the process to be as specific as the policy sets out. We believe that further detailed work is needed with the council and highway authority, along with the allocation to the west to find the best solution.</p> <p>As such, that the first part of this policy should remain, but the second sentence removed to be left to the planning application process.</p>	<p>Policy to read as follows: “The development of the site shall create a safe walking and cycling route linking the site with Cawston/Bilton to provide a safe walk to school route to Bilton School and Henry Hinde Juniors.” See proposed policy text changes at Appendix C.</p>

3. Creation of a strong southern landscape boundary to the developable part of the site to form a long-term defensible Green Belt boundary.	No comment.	
4. Built frontage along Rugby Road.	This is supported, but the local plan allocation diagram shows a “landscape edge to the development frontage”. As such these two policy requirements potentially work against each other i.e. is it landscaped edge to development frontage or a built development frontage to Rugby Road?	Confirmation on what is required, as there is currently potential conflict between policy wording/indicative site layout principles plan. We therefore propose that the landscape edge on the allocation diagram is removed.
5. No build area above underground pipeline to be integrated into the overall site layout to produce useable and attractive public space, overlooked by surrounding built form.	This is agreed in principle, but what can be done above the pipeline and standoff is often limited. This needs to be fully understood and signed off by the utility provider before it can be included in the policy.	We propose that the policy is updated to reflect that this needs to be subject to the utility provider’s requirements. See proposed policy text changes at Appendix C.
6. Strong network of active travel routes to and from Rugby Road, with a direct and legible link through the residential development to the southern recreational area.	Supported	None
7. Pedestrian crossing of Rugby Road to access bus stops.	Supported, subjected to highway support	Seek confirmation that WCC agree this is deliverable and supported.
8. Provision of links towards and contributions to the delivery of footpaths and cycle tracks along Coventry Road, including Local Cycling and Walking Infrastructure Plan (LCWIP) Route R63 (A428 Rugby Road, Long Lawford) which connects to Rugby town centre.	See comments on point 2 above.	See proposed policy text changes at Appendix C.
9. Contributions may be required towards the A4071/Potsford Dam scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is	See comments on point 2 above.	See proposed policy text changes at Appendix C.

<p>likely to involve further widening of the circulatory of the roundabout, widening of the A4071 North entry and exit arms, widening the A4071 South exit arm, and widening the Potsford Dam Link entry arm.</p>		
<p>10. Contributions may be required towards the A4071/B4112 Newbold Road scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve widening the circulatory on the northern/eastern section of the roundabout, alongside updating road markings to separate traffic flows on the B4112 Newbold Road approach.</p>	<p>See comments on point 2 above.</p>	<p>See proposed policy text changes at Appendix C.</p>



Appendix C Proposed tracked changes to policy Site ID253: Lawford Fields Farm

Representation Response

Rugby Borough Council – Regulation 19 Local Plan Consultation

Tritax Park Rugby West Limited

SLR Project No.: 416.066260.00001416.066260.00001

11 March 2026

Site ID: 253 (Lawford Fields Farm)

Development requirements:

- The Southern part of the site is not removed from the Green Belt and is allocated as open space. This part of the site shall be used for public recreational uses, for example sport pitches with a community use agreement, allotments or other public open space.
- ~~The development of the site shall create a safe walking and cycling route linking the site with Cawston/Bilton to provide a safe walk to school route to Bilton School and Henry Hinde Juniors. The route should include a controlled crossing point or bridge over the A4071.~~
- The development of the site shall create a safe walking and cycling route(s) linking the site to the surrounding area and community facilities. Such connectivity could include provision of a safe walking to school route to Cawston/Bilton and specifically Bilton School and Henry Hinde Juniors, the A4071/Potsford Dam scheme and the A4071/B4112 Newbold Road scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment, delivery of footpaths and cycle tracks along Coventry Road to Rugby town centre, including Local Cycling and Walking Infrastructure Plan (LCWIP) Route R63 (A428 Rugby Road, Long Lawford). The detailed routes and crossing points, and any financial contributions or their direct provision by the developer, will be agreed with the LPA and Highway Authority as part of the determination of a planning application.
- Creation of a strong southern landscape boundary to the developable part of the site to form a long-term defensible Green Belt boundary.
- Built frontage along Rugby Road.
- No build area above underground pipeline to be integrated into the overall site layout to produce useable and attractive public space, overlooked by surrounding built form subject to the utility provider's and or HSE approval.
- Strong network of active travel routes to and from Rugby Road, with a direct and legible link through the residential development to the southern recreational area.
- Pedestrian crossing of Rugby Road to access bus stops.
- ~~Provision of links towards and contributions to the delivery of footpaths and cycle tracks along Coventry Road, including Local Cycling and Walking Infrastructure Plan (LCWIP) Route R63 (A428 Rugby Road, Long Lawford) which connects to Rugby town centre.~~
- ~~Contributions may be required towards the A4071/Potsford Dam scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve further widening of the circulatory of the roundabout, widening of the A4071 North entry and exit arms, widening the A4071 South exit arm, and widening the Potsford Dam Link entry arm.~~
- ~~Contributions may be required towards the A4071/B4112 Newbold Road scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve widening the circulatory on the northern/eastern section of the roundabout, alongside updating road markings to separate traffic flows on the B4112 Newbold Road approach.~~
- The existing Public Right of Way (PRoW) must be maintained, and the design of the development must ensure it is pleasant to use. If possible, the PRoW should be routed through public open space. The PRoW shall be well overlooked. The PRoW should be maintained on its existing line if possible.

- Provision of a continuous non-vehicular route along the entirety of the northern edge of the site adjacent to Rugby Road.
- ~~No build area above underground pipeline to be integrated into the overall site layout to produce useable and attractive public space, overlooked by surrounding built form. –~~
This is a repeated bullet in the policy.



Appendix D Regulation 18 Representation

Representation Response

Rugby Borough Council – Regulation 19 Local Plan Consultation

Tritax Park Rugby West Limited

SLR Project No.: 416.066260.00001416.066260.00001

11 March 2026



Rugby Borough Council Local Plan Review – Preferred Options Consultation (March 2025)

**Consultation Response – Land at Lawford Fields Farm,
Long Lawford, Rugby (Site 253)**

Prepared on behalf of Tritax Park Rugby West Ltd

Prepared by:

SLR Consulting Limited

Mountbatten House, 1 Grosvenor Square,
Southampton SO15 2JU

SLR Project No.: 416.066260.00001

19 May 2025

Revision: 1

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
-	16 May 2025	LB/NB	NB	JR
1	19 May 2025	NB	NB	JR

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Tritax Park Rugby West Ltd (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.



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Appendices

Appendix A	Site Location Plan
Appendix B	Draft Local Plan Key Diagram
Appendix C	Landscape and Visual Overview Note



1.0 Introduction

- 1.1 This representation is prepared by SLR Consulting on behalf of our client, Tritax Park Rugby West Ltd in response to the Rugby Local Plan Review Preferred Options Consultation (March 2025).
- 1.2 Tritax Park Rugby West falls under the Tritax Group, which has a proven track record of delivering high quality, sustainable developments that add value to communities and local economies. Their forward-thinking approach to mixed use schemes integrates commercial viability with thoughtfully designed places, fostering inclusive design and development and creating local jobs. With a commitment to environmental stewardship and collaboration with local stakeholders, Tritax is well placed to support the aspirations of the Local Plan, ensuring that growth is not only strategic but also meaningful for the people who live and work in the area. The Tritax Group has a positive track record of delivering employment uses and associated infrastructure in and around Rugby.
- 1.3 Tritax Park Rugby West Limited owns the entire site which is 29.69 hectares.
- 1.4 This representation forms a response to the Preferred Options Consultation and the accompanying online questionnaire (sections 1(objectives), 2 (Strategy for Homes), 3 (Strategy for Employment) and 13 (Any Other feedback – in relation to site 253), which has been completed and submitted online alongside this representation.
- 1.5 The representation focuses on the areas of most relevance to our client’s interests, including sections 1, 2 and 3 of the questionnaire and draft policies S1, S2, S3 and S6 (and associated supporting text) of the consultation document. A description of the site, its potential for development and its benefits is also included in this representation at section 5.



2.0 Questionnaire Section 1

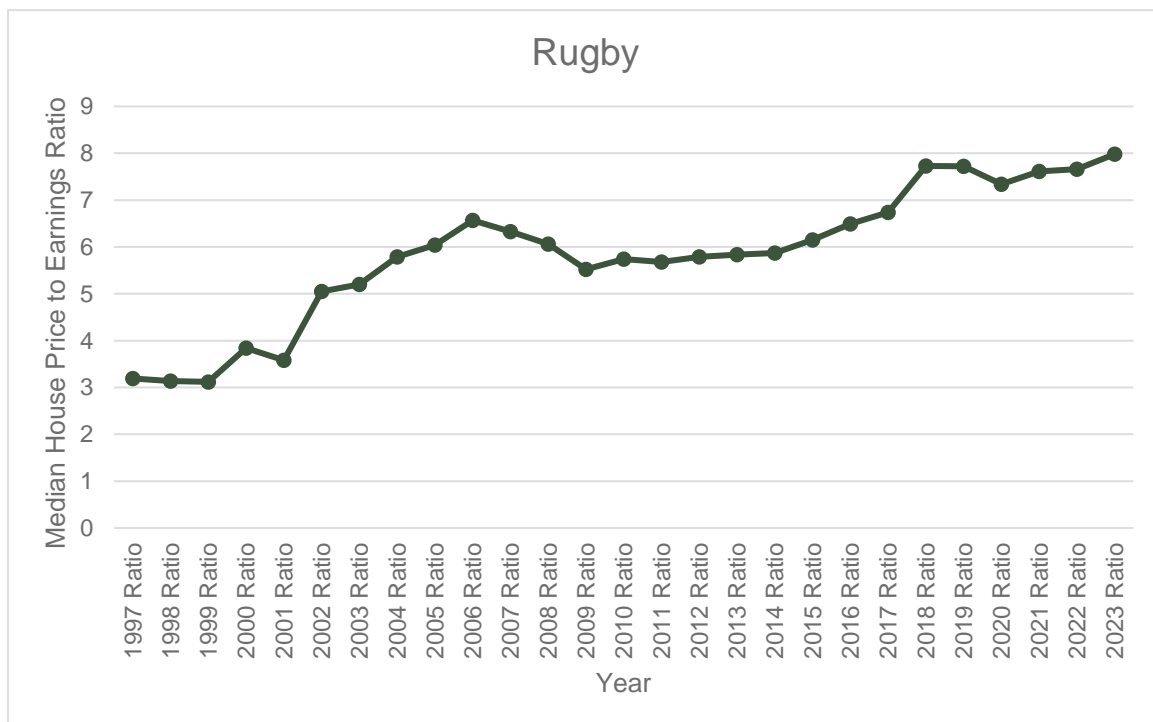
2.1 Section 1 of the questionnaire on the Consultation Document relates to the draft Plan’s six main objectives, which are:

1. Support the diversification and growth in sustainable locations of Rugby Borough’s economy in line with the Economic Strategy;
2. Support the revival of Rugby town centre;
3. Reduce emissions and adapt to climate change;
4. Raise design standards;
5. Deliver infrastructure-led growth; and
6. Facilitate a greener, more biodiverse borough and deliver new country parks.

2.2 Question 1 asks “to what extent to do you agree with the selection of these objectives?”, with answers ranging from ‘do not know’ and ‘strongly agree’.

2.3 Whilst the objectives 1-6 in themselves are not disputed, the lack of any clear and unambiguous objective in relation to the need to provide new homes to address the housing crisis is a disappointing omission.

2.4 Housing within Rugby Borough remains unaffordable for many, with the house price to earnings ratio of 7.98 higher than the regional average of 7.23. Furthermore, the ratio is worsening as indicated by the graph below:



- 2.5 The National Planning Policy Framework (NPPF) confirms that a key government object is to significantly boost the supply of new homes (NPPF paragraph 61), and this is underlined by their December 2024 updates to the NPPF and associated Standard Method for calculating housing need (hereafter the ‘SM’). The new SM results in an increased need of over 65,000 homes per annum across England, of which an additional 5,000+ per annum are to be delivered in the West Midlands.
- 2.6 Furthermore, there is a clear lack of affordable housing provision, with the latest HEDNA (November 2022) identifying a need for 407 rented affordable dwellings per annum (Table 8.45) and 88 new affordable homeownership homes. This equates to about 80% of the total SM housing need for the district.
- 2.7 More fundamentally, having a safe place to call home is a fundamental human right which is increasingly out of reach of more and more people. This is in large part due to the lack of new home provisions which is a key factor in the continued rise in house prices compared to earnings. National data indicates over one in ten 30 – 34-year-olds now live with their parents in England.¹
- 2.8 Having access to one’s own safe and secure place to call home leads to better outcomes all round; higher quality of life, better health, better able to positively contribute to the economy. In many ways, home ownership underpins the ability to achieve every other objective.
- 2.9 A 7th objective should therefore be added which unambiguously recognises the underlying importance of providing sufficient safe, high-quality homes. This proposed allocation could provide up to 300 much needed homes in a sustainable location, together with supporting employment uses and extensive parkland to the benefit of the wider Long Lawford community, which will also maintain a separate settlement identity and prevent Long Lawford merging with Rugby. .
- 2.10 Section 4 of this representation provides our commentary on the specific approach to housing in the district.

1

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/moreadultslivingwiththeirparents/2023-05-10>



3.0 Questionnaire Section 2

- 3.1 Section 2 of the questionnaire on the Consultation Document relates to the draft Plan’s strategy for homes and residential allocations (policies S2 and S6).
- 3.2 This section will firstly consider the overall quantum of housing planned for. It is noted that none of the questions specifically ask for views on the overall amount of housing planned for which is a significant omission given the importance of housing delivery to the overall plan and preferred approach. This is all the more surprising given the Sustainability Appraisal (March 2025 – hereafter the ‘SA’) *identifies a ‘high level case for remaining open to the possibility of higher growth scenarios’* – in other words, the final housing requirement for the Borough remains an open question. The omission of an invitation to comment on the housing need and requirement is disappointing.
- 3.3 The section will then go onto consider the spatial distribution of development proposed which is broadly supported but requires refinement where there are sustainable opportunities to focus additional homes in the most sustainable locations with the closest links to Rugby such as Long Lawford.

Housing Need and Requirement

- 3.4 Firstly, it is agreed that the minimum housing need should, in accordance with paragraph 62 of the NPPF, be established using the SM (as revised in December 2024). This provides, using the latest March 2025 affordability data, a need of 625 new dwellings per annum (dpa), or 13,125 dwellings for the period 2024-2045. This will need updating within the Plan as it progresses to reflect any further updates to the affordability ratio that occur before the Plan’s submission.
- 3.5 We support the confirmation in the SA that there is no justification for exploring a lower housing figure than that derived by the SM.²
- 3.6 The NPPF and associated guidance is also clear however that the SM derived figure is a minimum housing need figure. The NPPF goes onto confirm that in considering the housing need, the unmet needs of neighbouring areas should also be taken into account when establishing the housing to be planned for (paragraph 62). It also confirms that the need should be informed by the specific needs of different groups including the needs for affordable housing (paragraph 63). Paragraph 69 also confirms that other matters may result in a higher housing requirement, such as growth ambitions or infrastructure investment.
- 3.7 The Planning Practice Guidance (PPG) provides further confirmation regarding the SM derived need being a ‘minimum’ with the government supporting ‘ambitious authorities who want to plan for growth’ and ‘Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination’.³

² SA paragraph 5.2.6.

³ PPG <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [paragraph 40]



The Housing and Economic Needs Assessment and forecast household growth

- 3.8 As part of the evidence base for the Warwickshire authorities, a joint Housing and Economic Needs Assessment (HEDNA) was commissioned and published in 2022.
- 3.9 The HEDNA was undertaken and released at a time when the old SM applied which utilised 2014 based household projections to forecast housing need and it is recognised that the latest SM now uses housing stock rather than household projections to forecast need.
- 3.10 The HEDNA however undertook further analysis of the household formation projection in light of anomalies identified with Coventry’s projected household formation data which were acknowledged by the ONS. The HEDNA goes onto analyse what the housing need would be for Warwickshire based on newer and more household formation data. This decreased the need within Coventry but utilising the same methodology increased the need in Rugby given higher than anticipated household formation within the Borough. The resulted need recommended by the HEDNA was 735dpa, which would be equivalent to 15,435 for 2024-2045.
- 3.11 Whilst recognising that the new SM does not use household formation to ascertain housing need, and also recognising the HEDNA is now several years old, this is a clear indicator that the actual housing need in the Borough is likely higher than that derived by the new SM.
- 3.12 The SA provides no consideration or exploration of the discrepancy between the HEDNA derived need of 735dpa vs the SM derived need of 625. As a minimum the difference in conclusions should be assessed to understand if the difference in need deriving from the household formation-based data and the stock-based data points to a particular issue in Rugby Borough which suggests a higher housing requirement is necessary.

Affordable housing

- 3.13 The affordable housing need within the district also indicates a significant reason for further uplifts to the housing requirement.
- 3.14 The HEDNA confirms a need for 407 affordable rented dwellings per annum (Table 8.45) and 88 new affordable homeownership homes. This equates to about 80% of the total SM housing need for the district.
- 3.15 The HEDNA does rightly recognise however that it is highly unlikely an affordable housing requirement of 80% of new builds would be viable, bearing in mind the vast majority of new affordable housing provision arises from market led developments.
- 3.16 In any case, a lower level of affordable provision is already ‘baked in’ given the existing commitments based on a requirement of 20-30% affordable (adopted Policy H2). Furthermore, minor developments are except from providing affordable housing.
- 3.17 The surest way to create a step change in affordable housing delivery is to increase the overall housing requirement. The below table illustrates the amount of affordable housing that could be delivered per annum based on a range of potential alternative housing requirements, assuming an average 30% provision of affordable:



Housing Requirement	Affordable delivered (at 30% requirement)	Percent of affordable met	Potential cumulative deficit at 2045
1,650	495	100%	0
1,320	369	80%	-2,646
990	297	60%	-4,158
825	248	50%	-5,187
667 (forecast supply)	202	41%	-6,153
660	198	40%	-6,237
625 (SM need)	188	38%	-6,447

- 3.18 Whilst accepting that it may not be achievable to deliver 100% of the evidenced affordable housing need via an uplift to the housing requirement, the above illustrates that based on the proposed housing requirement and assuming 30% delivery on all sites delivered which is the maximum quantum currently required by policy H2, only 38% of the identified affordable housing need will be met.
- 3.19 This unmet affordable housing need rises to only 41% if the purposed supply of 14,134 homes comes forward (and they deliver on average 30% affordable). This is likely an optimistic figure given some of the issues with viability on committed sites in the supply.⁴
- 3.20 The SA tacitly acknowledges that affordable housing need may be a reason to explore a higher housing requirement:
- 5.2.11 Affordable housing need is understood to be high as a proportion of LHN, such that a housing requirement set at LHN would not provide for affordable housing need in full (recognising that affordable housing is delivered by market led housing schemes at a rate limited by development viability), and it should also be noted that Coventry’s affordable housing need is very high as a proportion of LHN.*
- 5.2.12 The implication is that affordable housing need does serve as a high level reason to remaining open to a housing requirement set above LHN.*
- 3.21 The SA goes onto suggest that the HEDNA itself does not provide sufficient evidence alone to justify a higher housing requirement. In our view, given the significant deficit in delivery of affordable vs affordable need, the HEDNA does provide a clear justification for a higher housing requirement.
- 3.22 As an absolute minimum it should prompt additional investigation into the affordable need in the Borough and the capacity to deliver additional houses above the SM to help meet that need.
- 3.23 The failure to deliver anywhere near sufficient affordable housing presents a significant risk to the Council’s ability to provide for peoples’ right to a safe and affordable place for people to call home.

⁴ Houlton and SW Rugby for example are likely to deliver significantly less than the policy requirement level of affordable given viability issues.



- 3.24 The pressing affordable housing need indicated by the HEDNA alone indicates a key reason to provide for a housing requirement above the SM.

Unmet housing needs

- 3.25 The position in respect of unmet needs is an evolving one and one that the LPA should remain alive to as other nearby LPAs plans evolve.
- 3.26 For example, and as the SA identifies, there are significant unmet needs arising from Leicester and they are required to undertake a local plan review which could result in further and increased levels of unmet need, which could have knock-on effects for the wider region.
- 3.27 Given Rugby Borough is relatively less constrained than many of its neighbours, the Council should be proactively engaging and cooperating with their neighbours to understand how any unmet needs that arise could be met. This will also be required to meet the duty to cooperate and the requirements of paragraph 27(b) of the NPPF. There is as yet little evidence of proactive engagement with Rugby Borough Council's neighbours. Paragraph 28 confirms Statements of Common Ground should '...be made publicly available throughout the plan-making process to provide transparency.'

The Housing Requirement and providing a suitable buffer

- 3.28 It is correct that Rugby Borough Council is considering the application of a buffer which is essential for ensuring their supply of sites is sound and to assist in meeting the rolling 5YHLS, accounting for the fact that an at least 5% buffer is applied to all 5YHLS calculations.
- 3.29 Consideration should also be given to historic lapse rates in delivery to help better quantify the extent of buffer needed. This may identify that a larger buffer is required to ensure that housing needs are being met.

Summary

- 3.30 For the reasons set out above there is a clear rationale for seriously exploring a housing requirement above the SM derived figure. The SM results in a minimum housing need. Evidence suggests there is likely to be reasons to deliver housing levels above the SM. Failure to fully explore opportunities to increase the housing requirement above the SM minimum housing need risks undermining the soundness of the plan, whilst denying those wanting to occupy their own home the chance to do so.

Spatial Strategy for Housing

- 3.31 In broad terms the preferred approach spatial strategy for housing is supported which recognises the need to disperse development to a range of settlements based on their sustainability. The provision of a higher level of housing at Long Lawford is therefore also sensible.
- 3.32 However, Long Lawford should be distinguished in the hierarchy by its excellent access to Rugby urban centre compared to other settlements and in particular the other settlements in the 'main rural settlements (tier 2)' settlement category.



- 3.33 From the edge of Long Lawford to the town centre and railway station is a single bus journey of circa 7 minutes. This compares to a longer journey time from the proposed allocation at Newton Manor Lane, nominally part of Rugby's allocation, of circa 20 minutes, including a 10-15 minute walk to the nearest bus stop. Similar differentials occur in relation to other modes of travel from Newton Manor Lane as well as other proposed allocations on the edge of Rugby.
- 3.34 Due to its proximity and the ease of access to Rugby town centre, Long Lawford is *more* accessible than allocations on the outer edges of Rugby. The particular unique features of Long Lawford relative to other settlements also categorised as 'tier 2' is not currently recognised. Its unique connection to Rugby provides an opportunity to allocate additional housing to Long Lawford.
- 3.35 It is recognised that Long Lawford (in common with a number of the settlements in the district) is surrounded by Green Belt. The NPPF is clear that to meet housing needs Green Belt should be considered for release, and Rugby's general approach whereby a number of sustainable Green Belt sites are proposed for release for development is welcomed. Paragraph 148 confirms in considering Green Belt review
- '...the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. 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.'*
- 3.36 Land south of Long Lawford is clearly an example where development at its southern edges aligns with the objective of prioritising sustainably located Green Belt release. This is further evidenced by the decision to propose the allocation of land at site 316 (land south of Coventry Road) which requires Green Belt release. Rugby's own evidence base suggests that there is very little, if any, difference between site 316 and site 253 in technical terms, or in the specific site constraints that would need to be considered through the detailed master planning process. Of note however is that site 253 actually performs better than site 316 in Rugby Borough's Landscape Sensitivity Assessment with an overall landscape sensitivity that is considered to be low (site 253) versus a moderate/low sensitivity (site 316).
- 3.37 There also remains considerable uncertainty in relation to other sites, for example site 122 (Old Laurentian Rugby Club) is proposed for allocation of 80 units, but is reliant on the site being vacated by the existing rugby club who remain active on site and require alternative provision before they can vacate. There may be opportunities at site 253 to provide replacement Rugby provision, alongside additional housing, enabling both sites to come forward.
- 3.38 It is also noted that 50dpa are expected from small site windfall, however, no evidence appears to have been presented to back up this allowance. NPPF paragraph 75 requires 'compelling evidence that they [windfall] will provide a reliable source of supply.' No such evidence looking at historic delivery and expected future trends has been set out. Furthermore, windfall allowance should be deducted from the first 3 years of the plan plus any past years at the point of likely adoption (equivalent to at least 150 homes) to avoid



double counting with those sites already benefitting from planning permission included in the 'other sites with planning permission' category of supply.



4.0 Questionnaire Section 3

- 4.1 Section 3 of the questionnaire on the Consultation Document relates to the draft Plan’s strategy for employment land and employment allocations (policies S3 and S7).
- 4.2 Question 7 asks “*to what extent do you agree with the strategy for employment land?*”, with answers ranging from ‘do not know’ and ‘strongly disagree’ to ‘strongly agree’.
- 4.3 Our response to this question is ‘disagree’ because there are additional locations, including the site at Lawford Fields Farm, that would be well suited to accommodate an employment site for small units to meet the identified needs of this market sector. This is discussed further in this section.
- 4.4 Five new employment land allocations are proposed in the draft Plan as set out within draft policy S7: Employment allocations, which include:
- Coton Park east – circa 115,000m²;
 - South West Rugby employment phase 2 – circa 130,000m²;
 - North of Ansty Park – circa 75,000m²;
 - Crowner Fields Farm and Home Farm, Ansty – circa 275,000m²; and
 - Prologis Park west and Mountpark, Ryton-on-Dunsmore – circa 350,000m².
- 4.5 The five proposed new employment allocations are for non-office employment use and provide a total floorspace of 945,000m². In addition, draft policy S3: Strategy for employment land proposes 272,975m² of employment floor space through expansion of existing employment sites and 14,012m² of employment floor space has been accounted for from employment planning permissions on small sites as at 1 April 2024. This forms part of the Borough’s need for employment land over the Plan period 2024 – 2045.
- 4.6 The West Midlands Strategic Employment Sites Study (August 2024) forms part of the evidence base to the draft Plan. In this, it explains that “*the market evidence points to a strong need for additional investment sites to be brought forward across the region to support growth*” and “*Coventry and Rugby continue to be the key markets in the Midlands and continue to see high levels of demand and resulting take-up. The market is positioned firmly within the “golden triangle” with immediate access to the M6/M1 interchange*”. This therefore highlights the importance of ensuring sufficient employment land provision is accounted for over the Plan period within the Borough.
- 4.7 The Sustainability Appraisal (March 2025) by Aecom (on behalf of Rugby Borough Council), acknowledges that the site is “*an option for a residential-led scheme but is also available for employment. A small extension to the Paynes Lane industrial estate could warrant further*



consideration, but the potential for a medium-sized scheme appears to be limited by land availability (a field excluded from Site 253)⁵”.

- 4.8 The Stage 2 Site Selection Report (March 2025) confirms that the site is a potential site option and that the landscape sensitivity is low. Furthermore, the site was considered a potential site option but has not been included within the draft Local Plan.
- 4.9 Some of the proposed employment allocations, such as Crouner Fields Farm (site 95) and North of Ansty Park (site 14), are also within the Green Belt and in the Stage 2 Site Selection Report (March 2025) it considers the former to be of ‘medium/low’ landscape sensitivity and the latter to be of ‘low’ landscape sensitivity. Both sites are considered to “*potentially provide a strong contribution to at least one green belt purpose*”. The Council is therefore proposing to make changes to the Green Belt to accommodate employment site allocations and the site at Lawford Fields Farm also falls within the same bracket as the two sites mentioned, scoring higher in terms of landscape sensitivity than the Crouner Fields Farm site.
- 4.10 The questionnaire for section 3 explains that the five employment land allocation sites have been selected because:
- They are expansions to or are well-related to existing successful employment areas and major road links;
 - They are close to the main centres of population in Coventry and Rugby, reducing commuting distances; and
 - They offer opportunities for diversification of the economy, a range of different scales of building and the delivery of other benefits including country parks/public open space and training facilities.
- 4.11 The site at Lawford Fields Farm is immediately adjacent to an existing strategic employment site (Paynes Lane), as covered under adopted policy ED1 and draft policy E1. It is therefore an ideal location for expansion to enable additional employment development. Approximately 3ha of the site at Lawford Fields Farm is proposed as land for employment use, as shown in the accompanying proposed Draft Local Plan Key Diagram below (Figure 1). It is bounded to the north by the A428 and to the south by the A4071, both major road links. This therefore accords with the first reason as set out above.
- 4.12 The site is located adjacent to the settlement boundaries of Long Lawford and Rugby town, the former being a growing settlement with an additional residential allocation proposed in the draft Plan for circa 400 dwellings (draft policy S6) and the latter being the largest settlement area in the Borough. The site is therefore within very close proximity of main centres of population and would therefore accord with the second reason.
- 4.13 The circa 3ha portion of the site proposed as land for employment use has the benefit of forming part of a wider site being put forwards for both residential and employment use, as outlined in this representation. It is therefore proposed that the wider site would provide large amounts of open space along the southern and western boundaries, as well as community

⁵ Paragraph 5.4.94



parkland and potential sports uses or community facilities. The area of the site proposed for employment use is also flexible in terms of what the precise use would comprise of and the building scales. This therefore accords with the third reason.

- 4.14 It is therefore evident that the north-eastern part of the site at Lawford Fields Farm is an ideal site for employment use development and would form an extension to the Paynes Lane existing strategic employment site.



5.0 Land at Lawford Fields Farm

- 5.1 Our client, Tritax Park Rugby West Ltd owns the land to the south of Coventry Road and east of Bilton Lane. The site has HELAA reference 253 and has been assessed in the HELAA and stage 2 Site Assessment Report. Prior to Tritax's ownership, it was also subject to a withdrawn planning application with reference R20/0134 for 351 residential units and associated open space and community facilities.
- 5.2 Since the site's previous promotion and the withdrawn application, a new project team has been appointed to review the site's potential for development afresh and ensure the site is considered sensitively adopting a truly landscape-led approach to protect the key characteristics of the site as well as the separate identifies of Long Lawford and Rugby.
- 5.3 This section provides an overview of our consideration of the key site constraints, focusing initially on the suitability of the site in principle, given its sustainable location, before providing an overview of the landscape, ecology, highways and drainage. It will also provide a brief review of initial findings on noise and air quality, confirming these are not a constraint to development.
- 5.4 Regard will also be had to the previous assessments of the site which have helped inform our own assessment.
- 5.5 A Draft Local Plan Key Diagram is included at **Appendix 2** of this representation which has been developed based on an initial technical review of the site as outlined below. An extract of the plan is provided below:

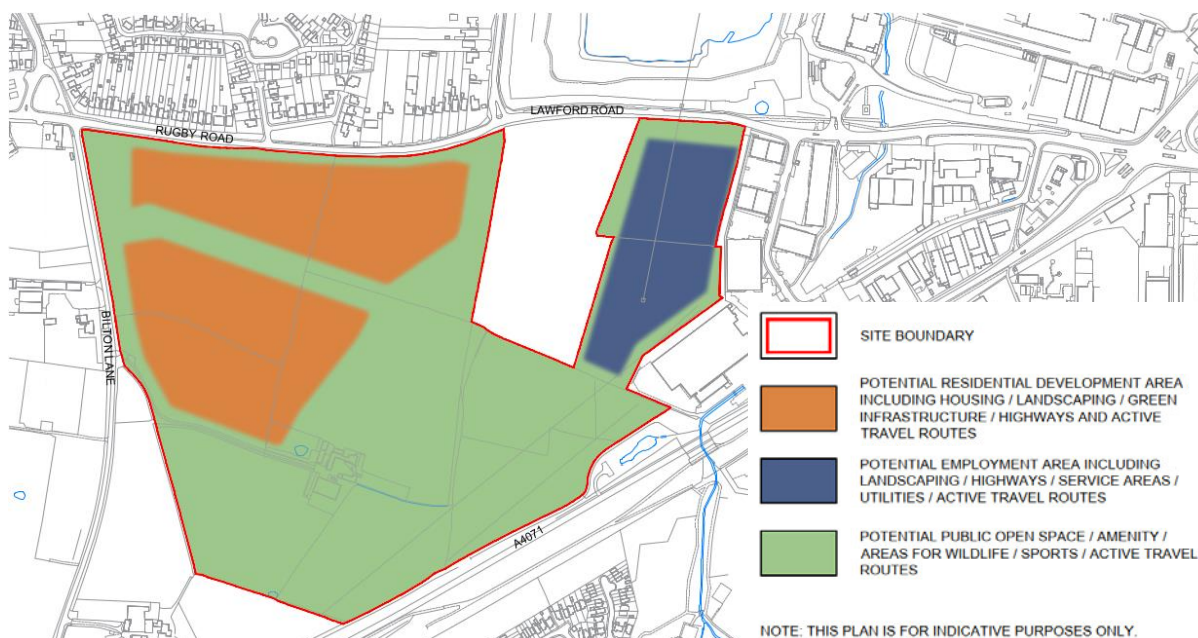


Figure 1 - Indicative Draft Local Plan Key Diagram showing Proposed Land Use



Highly Accessible Location

- 5.6 The site is located in a highly sustainable location lying closer to Rugby town centre than any other new greenfield residential site suggested for allocation. As identified in section 2 of this report, the site has better access to Rugby Town centre, and the many facilities it has to offer.
- 5.7 Rugby Railway Station is also located approximately 3.5km from the site frontage on the A428, which is accessible within a ~15-minute cycle. Alternatively, the rail station can be accessed in under 30 minutes through the use of public transport and walking. Rugby Railway Station provides direct services towards Birmingham and London, as well as Manchester and Crewe.
- 5.8 The site would form a modest extension of housing to Long Lawford to the south, coupled with extensive parkland spaces which could include sports pitches, allowing future and existing residents to benefit from additional local facilities and amenities. A safe and convenient pedestrian route from the north-western corner of the site into the centre of Long Lawford is available in the form of a recently installed signal-controlled crossing. Back Lane has been improved as part of the Phase 4 Long Lawford development north of the A428, improving the attractiveness of the route towards local amenities.
- 5.9 All of Long Lawford is located within a 2km walking distance of the site frontage on the A428, which includes a public house, multiple play areas and green spaces, convenience stores, takeaways, a primary school, a place of worship and access to active and public transport links such as bus stops and Public Rights of Way. The site affords opportunities to incorporate improved pedestrian/cycle connectivity to the A4071/Bilton Lane junction – currently there is no provision between Long Lawford and this junction – which provides onwards connection to additional primary education and secondary school (Bilton School) options.
- 5.10 Commencing just east of Briars Close, a shared footway / cycleway is present along the northern side of the A428, which allows for off-road cycle crossing facilities at the junction with the A4071. From here, cycleways extend to the north and south on the A4071, providing safe cycle routes to various areas of Rugby
- 5.11 The nearest bus stops to the site are the ‘Townsend Lane’ and ‘Rugby Road’ stops, located at the Townsend Lane / A428 junction. These stops are frequently served by the 86 bus, which routes from Rugby to Coventry, via Long Lawford. Due to the bus route through Long Lawford, it is not achievable to create new bus stops on the main site frontage on the A428; however, existing bus stops are conveniently located to be accessed by active travel links from the site. The 86 bus operates in each direction approximately once an hour.
- 5.12 The depth of the indicative residential area within the site is within 400m of the site frontage onto the A428, indicating that the majority, if not all, residents will be able to access a bus stop within 400-500m walking distance.
- 5.13 A vision-led approach to accessibility from and around the site will be adopted promoting active travel modes and based on Active Travel England guidance. The site’s location close to Rugby centre provides ideal opportunities to create a new neighbourhood where active travel modes are a genuine choice for future residents.



- 5.14 The site, whilst within the Green Belt, also aligns with the paragraph 148 requirements to consider how, when considering Green Belt release, a site’s location can promote sustainable modes of travel.

Green Belt Location

- 5.15 The site’s location in the Green Belt is recognised, as is the site’s position between Rugby and Long Lawford.
- 5.16 However, the proposals have been premised on maintaining the separation between settlements to protect their individual identities through the implementation of an in perpetuity green gap between the settlements. Whilst detailed proposals are still being developed, the intention is that this green gap will form a key part of the Green Infrastructure Network, preventing the settlements of Long Lawford and Rugby merging through public open space offered in perpetuity.
- 5.17 The delivery of a Green Corridor also aligns with paragraph 156(c) ‘Golden Rule’ in relation to the provision of new high quality public open space close to homes.
- 5.18 The development of the housing parcels to the west represents a natural extension of Long Lawford, similar in approach to preferred allocation for site 316 to the west of the site, and which will round off the settlement.
- 5.19 From initial reviews of the site, there is also no indication that the site’s development would adversely affect the historic setting or special character of Long Lawford or Rugby.
- 5.20 Initial landscape consideration of the site’s development relative to the Green Belt purposes is included within the Landscape Overview document appended to this report. A full LVIA and Green Belt assessment would be submitted with any future planning application.

Comparison to proposed allocation 316

- 5.21 Given the proximity of our site with the proposed allocation 316 to the west, which Rugby Borough Council is appropriate to allocate for development, it is considered helpful to undertake a brief comparison of the sites which confirms that site 253 is at least as suitable for allocation as site 316. The comparison is based on evidence presented by the Council in the site options assessment and the SA.

Category	Site 316 (Proposed Allocation)	Site 253 (Client’s site)
Accessibility [Stage 2 Site Options Assessment]	<i>The surrounding road network is relatively uncongested. The moderate score in the Vectos assessment based on MSOA-level accessibility does not pick up that the site lies on a good bus route and has potential for pedestrian routes into Long Lawford.</i>	<i>The surrounding road network has medium levels of congestion, and assessed accessibility is moderate, but this is influenced by MSOA-level assessment and the site could benefit from bus services on Lawford Road. However, pedestrian connectivity to the village centre is weaker than land to the west.</i>



Category	Site 316 (Proposed Allocation)	Site 253 (Client's site)
Green Belt [Stage 2 Site Options Assessment]	<i>The site is entirely within the Green Belt, potentially making a strong contribution to at least one purpose.</i>	<i>The site is entirely within the Green Belt, potentially making a strong contribution to at least one purpose. ...its development would coalesce Rugby and Long Lawford contributing to the sprawl of the Rugby built-up area.</i>
Landscape Sensitivity [Stage 2 Site Options Assessment and Landscape Sensitivity Assessment of Strategic Site Options]	Medium to low Landscape Sensitivity (performs worse in 6 out of 12 landscape criteria)	Low Landscape Sensitivity (performs worse in only 1 (scale and enclosure) of 12 landscape criteria)
Heritage [Stage 2 Site Options Assessment]	<i>The site is located at the southern edge of Long Lawford, and envelopes Avon Lodge, a grade II listed 18th-century farmhouse.</i>	<i>There were no designated heritage assets identified within 50 metres of the site.</i>
Flood Risk [Stage 2 Site Options Assessment]	<i>Constraints for foul water drainage are assessed as High, constraints for surface water drainage are assessed as Low. There is an area of Flood Zone 2 and 3 on the site's western boundary.</i>	<i>Constraints for foul water drainage are assessed as High, constraints for surface water drainage are assessed as Low</i>
Stage 2 options Assessment conclusion	<i>The site is a potential site option.</i>	<i>... the site is a potential site option.</i>

- 5.22 The comparison shows that our site performs demonstrably better, or at least comparably, in many regards based on the Council's own assessment.
- 5.23 The key negative differentiator in the Council's assessment is site 253's location between Rugby and Long Lawford. However, the indicative land use proposals demonstrate how an in perpetuity green gap can be provided between the settlements to guard against the future merging of settlements.
- 5.24 In respect of accessibility, the site has comparable levels of access to Long Lawford settlement centre, with signalised pedestrian crossing infrastructure across the A428 already in place providing a safe route towards local shops. It is also located closer to Rugby town centre and close to public transport provision.
- 5.25 The site therefore demonstrably performs at least as well as site 316 proposed for allocation and in a number of ways is more suitable for development. It can also help deliver both commercial and residential development helping meet a range of district needs.



Landscape and Visual

- 5.26 An initial landscape visual review of the site has been undertaken to help lead the proposed land uses on site. The Landscape Overview note is appended to this report.
- 5.27 The review confirms the Council’s own finding that the site has ‘low’ overall landscape sensitivity. This compares to a moderate to low sensitivity given to the proposed site allocation to the west by the Council (site 316). It is recognised however that landscape mitigation will be necessary, and this has informed the proposed location of development parcels on the site as well as the proposed Green Corridor through the site’s centre along the higher ridgeline that runs approximately north-south through the site.
- 5.28 The resulting development areas adopt a more conservative approach than the previously withdrawn proposals, pulling the residential development parcels away from the south and south-east to provide a greater separation to the A4071.
- 5.29 The appended Landscape and Visual Context plan provides initial analysis of the landscape constraints and opportunities which have informed the masterplan for the site.

Achievable Access

- 5.30 Due to the extent of frontage available, multiple access options are achievable at the site. Figure 2 shows an indicative preferred access strategy, based on previous comments raised by WCC.

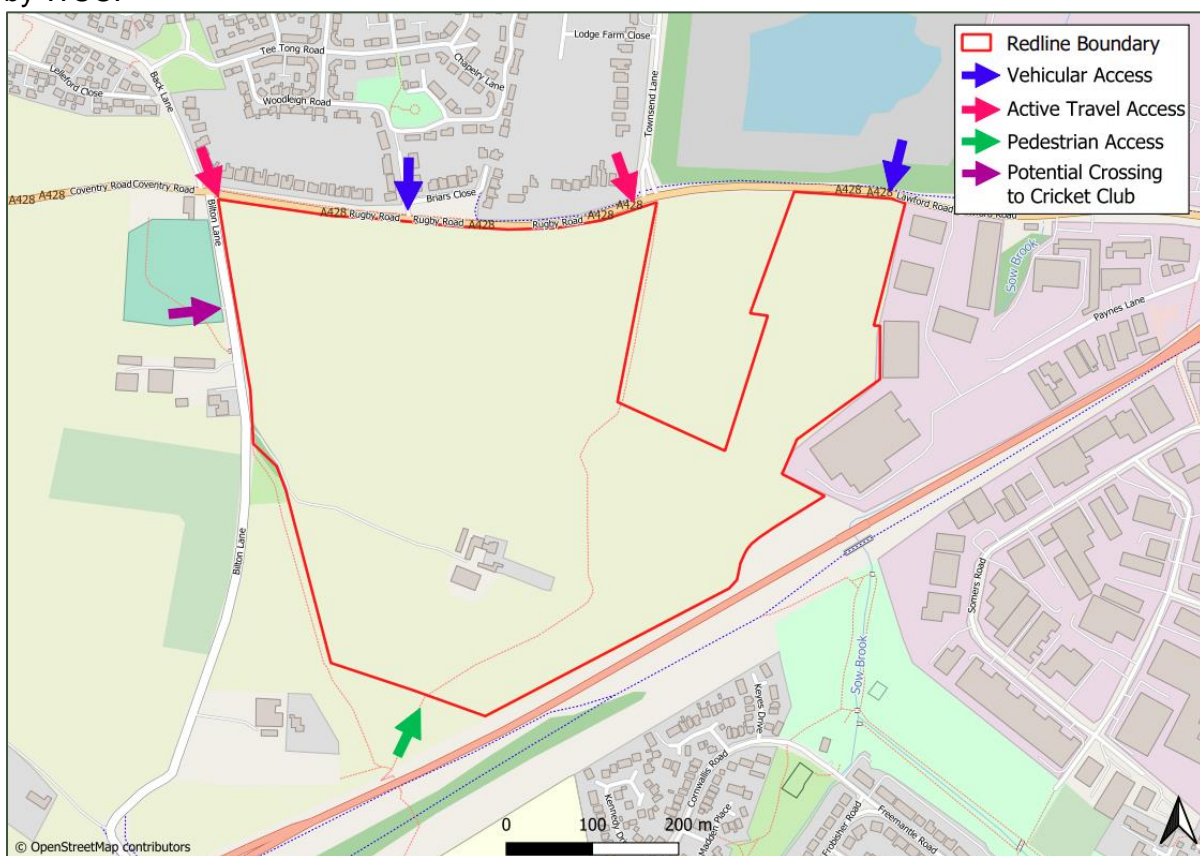


Figure 2 - Indicative Access Strategy



- 5.31 Whilst a final access design has not yet been arrived at, various options are being explored including a roundabout onto the A428 and a dual access option using Bilton Lane and a right turn priority lane access from the A428. We are confident a suitable vehicular access can be provided without the need to use Bilton Lane for vehicle access.
- 5.32 Pedestrian access is also being carefully considered to maximise the opportunities provided by the site's highly accessible location. This includes exploring off-highway pedestrian and cycle routes within the site to allow access to the existing and potential new facilities along Bilton Lane, and active travel routes across the proposed Green Corridor to provide links towards Rugby, including potential to the south to provide improved active travel routes to Bilton Secondary School and Henry Hinde Junior School to the south. .

Biodiversity

- 5.33 To date, a relatively limited range of ecological receptors have been identified on-site, albeit the site will be subject to further ecological surveys.
- 5.34 The site offers opportunities for significant biodiversity enhancement which could build on key features already present or in the wider area, notably the mature hedgerow and tree network and populations of species including bats and amphibians. Land use plan proposals would seek to maintain existing field boundaries whilst providing, via the proposed Green Corridor, significant opportunities to enhance onsite ecology.
- 5.35 As master planning work progresses, integrating biodiversity into the design process will be an integral part of the site design, to protect species identified on site and accord with the mitigation hierarchy and trading rules that apply to BNG, to most effectively and appropriately deliver at least 10% BNG.

Flood Risk and Drainage

- 5.36 The site is at the lowest risk from Fluvial Flooding according to the latest EA flood risk mapping for planning. The vast majority of the site is also at the lowest risk of surface water flooding based on EA mapping. Development will be directed away from the small, isolated areas at heightened surface water risk.
- 5.37 The proposals would incorporate SuDs features within the site to manage surface water risk over the lifetime of the development and to avoid increased flood risk off-site.

Air Quality and Noise

- 5.38 In respect of Air Quality, it is recognised that the site is in an AQMA, together with the whole urban area of Rugby and surrounds. However, an initial review identifies air pollutant concentrations (principally as annual mean nitrogen dioxide (NO₂) concentrations, for which the Rugby Air Quality Management Area (AQMA) was previously declared) are below the relevant AQAL. On this basis, there is considered to be no baseline air quality constraint to the Site coming forward for residential use during the Local Plan period.
- 5.39 In respect of noise, the main potential source of noise disturbance is from traffic associated with surrounding roads on new residential receptors. However, with appropriate offsets from



these roads, as already incorporated into the indicative land use plan, it is not anticipated noise will result in an overriding issue for development of the site.

Summary

- 5.40 Whilst further site assessment work remains ongoing to inform detailed site master planning, the initial site studies, supplemented by the Council’s own assessments, indicate that the site is in an ideal location for residential development to the north-west, acting as an organic extension to Long Lawford to ‘round off’ the settlement, and commercial development to the eastern edge as a modest extension to the successful Paynes Lane employment area.
- 5.41 Delivery of high-quality housing, employment, and open space uses, together with contributions and infrastructure improvements through a planning consent and subsequent delivery, would enable the Council to deliver against its social, environmental and economic objectives. This would boost the Borough’s supply of housing, including affordable housing, deliver additional commercial space, and provide a unique opportunity to deliver a long-term green infrastructure link through the site to benefit biodiversity and maintain the permanent separation between Long Lawford and Rugby.
- 5.42 Consequently, Rugby Borough Council should re-consider including the site in the Local Plan as a sustainable development.



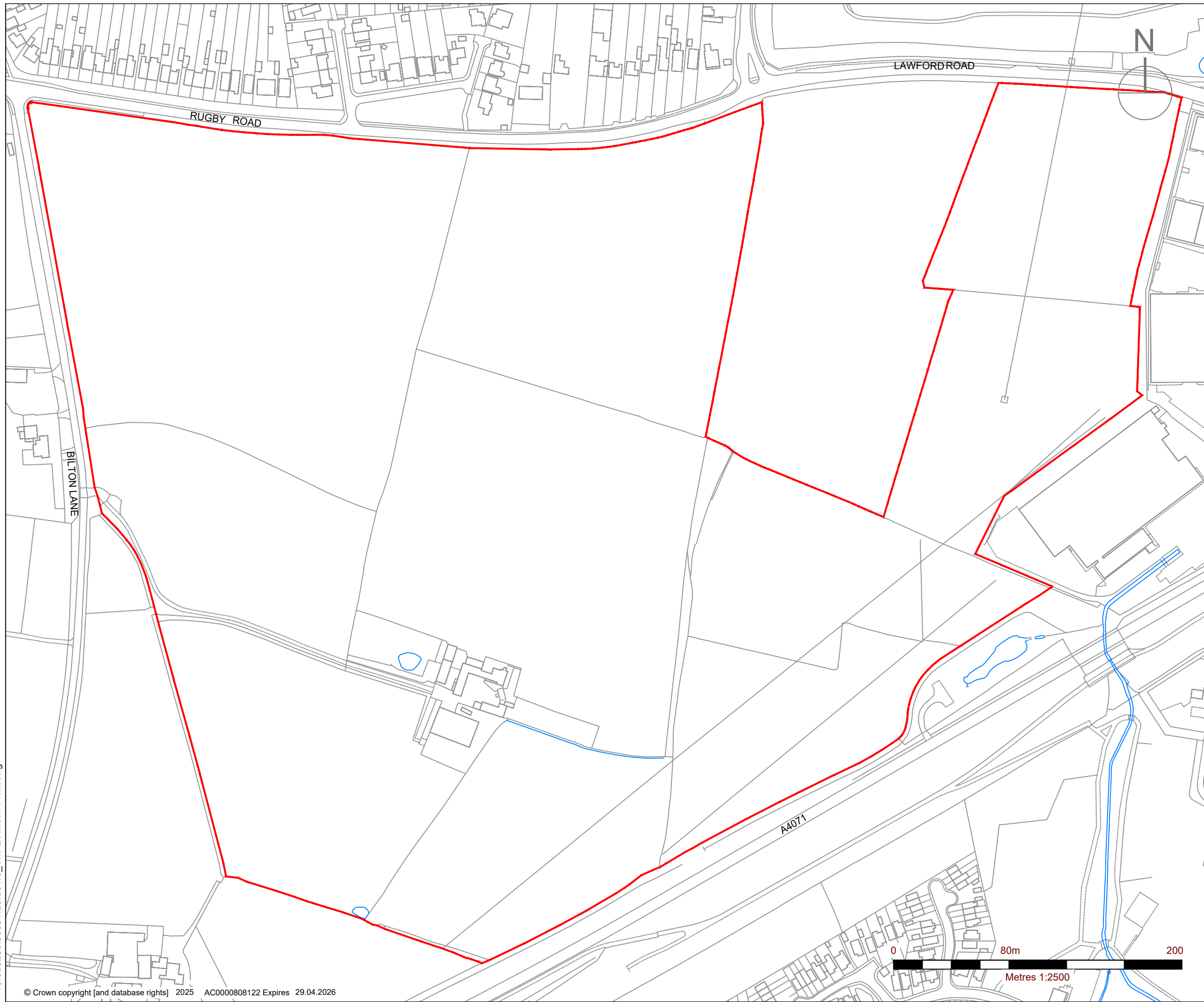
6.0 Conclusion

- 6.1 We welcome the opportunity to provide feedback on the Regulation 18 Preferred Options consultation and are pleased to see Rugby Borough Council progressing a new plan.
- 6.2 This response to the Regulation 18 consultation provides feedback on the plan objectives, employment and housing policies, as well as presenting our case for the inclusion of site 253 in the plan as a mixed use commercial and residential allocation.
- 6.3 We would welcome a dialogue with the Council regarding the allocation of the site and would be happy to provide additional information to demonstrate the suitability of the site if required.





Appendix A Site Location Plan



LEGEND

 INDICATIVE SITE BOUNDARY

416.066260.00001.29.001.0_Site Location Plan.dwg

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LAND AT LAWFIELDS FARM
 LONG LAWFORD
 TRITEX PARK RUGBY WEST LIMITED
 SITE LOCATION PLAN

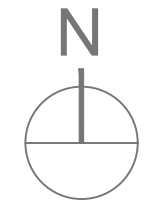
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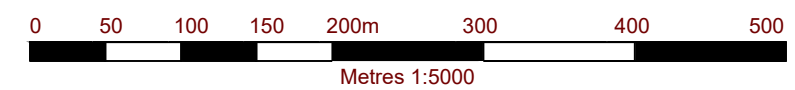
Appendix B Draft Local Plan Key Diagram



LEGEND

-  SITE BOUNDARY
-  POTENTIAL RESIDENTIAL DEVELOPMENT AREA INCLUDING HOUSING / LANDSCAPING / GREEN INFRASTRUCTURE / HIGHWAYS AND ACTIVE TRAVEL ROUTES
-  POTENTIAL EMPLOYMENT AREA INCLUDING LANDSCAPING / HIGHWAYS / SERVICE AREAS / UTILITIES / ACTIVE TRAVEL ROUTES
-  POTENTIAL PUBLIC OPEN SPACE / AMENITY / AREAS FOR WILDLIFE / SPORTS / ACTIVE TRAVEL ROUTES

NOTE: THIS PLAN IS FOR INDICATIVE PURPOSES ONLY.



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DRAFT LOCAL PLAN KEY DIAGRAM

416.06620.00001.29.004.0

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Appendix C Landscape and Visual Overview Note

Tritax Park Rugby West Limited

SLR Project No.: 416.066260.00001

15 May 2025

Revision: Issue

RE: Land at Lawford Fields Farm - Landscape Overview

Landscape and Visual Baseline

An initial high-level landscape and visual review of the site and the surrounding landscape has been undertaken in May 2025. This high-level review helped to identify the features that define the landscape and visual context of the site and its surroundings. This review is supported by illustrations – Figure 1 and Views (photographs from key locations within and around the site).

Landscape Context

It is noted that the parcels within the site are predominantly in pastoral use, with some agricultural uses and largely, free from existing development with the exception of buildings associated with Lawford Fields Farm.

As illustrated in Figure 1, Landscape Context, a ridgeline runs south-west to north-east through the site. The land reaches a high point of over 100m AOD in the south-western corner, with the ridgeline extending to the north-east from this point, and the topography sloping down to the west and east on either side. The landform is lowest at the eastern edge of the site. Vegetation within the site and within the wider context is largely defined by the gappy low managed hedgerow with intermittent mature trees. The southern boundary features acoustic fencing and mature trees/vegetation along the A4071. The northern boundary along the A428 Lawford Road features low, somewhat gappy hedgerows, creating a relatively porous boundary along this edge. The western boundary is defined by a hedgerow along Bilton Lane at its northern extent. The hedgerow extends south along the PRoW forming the southern extent of the boundary to the west.

Aesthetic and Perceptual Features

Perceptually, through the site being in pastoral uses, it is simple in form. However, it forms part of a landscape pattern that is dominated by built-up presence wrapping the site on three sides - north, east and south (infrastructure associated with the busy road network and the coarse grained warehouse/industrial development to the east, and the settlement edge of Rugby to the south and Long Lawford). This busy visual and auditory context on three sides, is in contrast to the open countryside landscape to the west, and introduces a degree of diversity within the baseline landscape and visual context.

Visual Context

As a result of the topographical, vegetation and aesthetic and perceptual context outlined above, the site has a visual relationship with built form to the north, east and south, with localised intervisibility with the development to the north along Long Lawford Road. Owing to the ridgeline running diagonally through the site, the east and southeast and southern facing aspect of the site allows medium distance intervisibility with existing development in these directions. This is illustrated in Figure 1, and the Views 3, 5 and 6. The development within Rugby set within a vegetated backdrop forms part of the elevated skyline seen from this eastern part of the site.



Figure 1: Views across to the south and southeast towards Rugby



Figure 2: Views to the north-east towards industrial development and development within Rugby seen on higher ground

The western sloping aspect allows for views (Views 2 and 4) across open fields and built up context within Long Lawford and to elevated ground in the horizon.



Figure 3: Views across open countryside extending to higher ground in the long distance

Green Belt

The site is located within the Birmingham Green Belt. The Green Belt boundary follows the A4071 to the immediate south of the site, and the A428 to the north, as well as passing along the eastern boundary of the site adjacent to the industrial estate east of the site, as illustrated in Figure 1 – Landscape Context Plan.

In terms of openness, the site is predominantly free from development within its boundaries, with the exception of Lawford Fields Farm. There is a strong influence of built development and associated urban activity (roads, noise, lighting) on the northern, eastern and southern boundaries. To the west, the landscape is more open and there are visual connections with the open countryside.

In terms of sprawl and encroachment, the site is located on the edge of the built-up area, visually and perceptually influenced by commercial development along the eastern boundary, residential development within Rugby extending south beyond the A4071, which forms the southern boundary, and residential development within Long Lawford forming the



north-western boundary. The western edge is bounded by Bilton Lane with open space amenities such as the cricket club and grounds, allotments and dog park located along this edge. Therefore, there is an opportunity for a strong edge definition in the form of a green corridor, promoting improved access to these open space amenities.

In terms of coalescence, owing to the industrial development to the north east and east of the site visually and perceptually, development is perceived to be extending between the two settlements, with a limited sense of separation in the baseline landscape. Therefore, there is an opportunity to reinforce a sense of separation through green corridors/green gap along the centre extending to the eastern edge of the site.

Though elevated sections within the site are visible from some elevated areas within the development in Rugby (View 10), there is limited/no intervisibility between the site and the historic central part of Rugby and the conservation areas, with views of the site generally being restricted to more recent development on the south-western edge of Rugby.

A more detailed review of the Green Belt in conjunction with the NPPF (December 2024) and landscape and visual matters (LVIA/LVA¹) would be undertaken to accompany any future planning application.

Summary

Landform within the site and the contextual relationship and intervisibility of the site with wider countryside to the west and built form within Rugby to the east and south and Long Lawford to the north are key considerations, in landscape and visual terms. The Site Options report² identifies the site (253) as Low overall landscape sensitivity with *a patchwork of arable and pastoral fields of various shapes and sizes, divided and bounded with hedgerows, which are well maintained and cut short* and *“surrounded by development within the town of Rugby to the north, east and south.”*, and in Green Belt terms, development within the site *“would coalesce Rugby and Long Lawford contributing to the sprawl of the Rugby built-up area”*.

Therefore, to integrate new development into the local landscape, visual and Green Belt context, appropriate mitigation measures in the form of landscaped ‘green’ corridors and careful consideration to the positioning and density of development within this site will be important in the masterplanning process.

This understanding of the site and its context have helped to identify the areas with potential for development within the site, as illustrated on Drawing 416.06620.00001.29.004.0 Draft Local Plan Key Diagram.

¹ Landscape and Visual Impact Assessment/Appraisal in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA3), published by the Landscape Institute and Institute of Environmental Management and Assessment, and Green Belt Review in accordance with the recently published NPPF (December 2024) and Green Belt Guidance (27 February 2025).

² Rugby Borough Stage 2 Site Options Assessment March 2025





Legend:

KEY FEATURES

- PRoWs within site running along ridgelines

LANDFORM

- Contours
- Sloping landform
- Ridgeline landform

VEGETATION

- Gappy low managed hedgerow with intermittent mature trees

KEY VIEWS

- Key viewpoint locations
- Key views out from site
- Key views into site
- Key landmark in views - tall cement factory infrastructure

0	Issue	8/5/25	GK	CKJR
Rev	Amendments	Date	By	Chk Auth



Client
Tritax Park Rugby West Limited

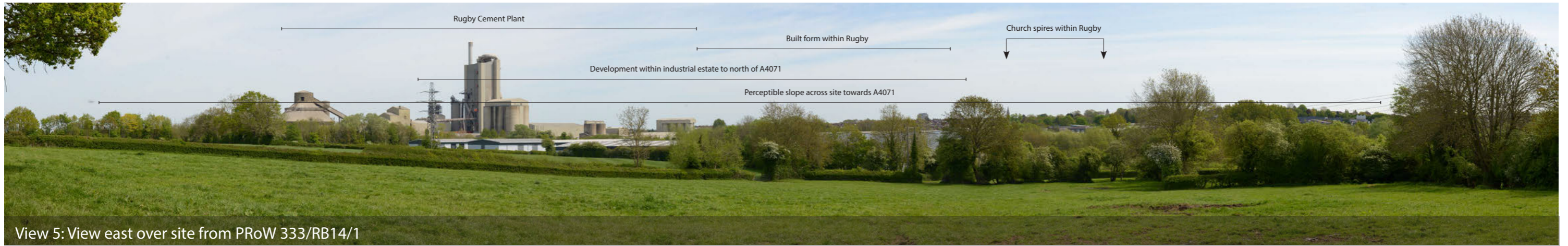
Project
Land at Lawford Fields Farm

Figure Title
Landscape and Visual Context

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View 5: View east over site from PRoW 333/RB14/1



View 6: View east over site from PRoW 333/RB14/1



View 7: View south towards eastern part of site from Lawford Road



View 8: View south towards central part of site from Lawford Road at pedestrian entrance to Briars Close



