

BLADE

LANDSCAPE TECHNICAL NOTE

LAND AT HOMESTEAD FARM, COVENTRY ROAD,
DUNCHURCH, CV22 6RE

ON BEHALF OF

WARWICKSHIRE PROPERTY DEVELOPMENT LTD

MARCH 2026

V2

BIODIVERSITY
LANDSCAPE
ARBORICULTURE
DESIGN
ECOLOGY

Report Data	
Title	Landscape Technical Note
Site Address	Land at Homestead Farm, Coventry Road, Dunchurch, CV22 6RE
Client	Warwickshire Property Development Ltd
Blade Reference	L-1930
Date Created	02/03/2026
Author	James Bullock

Version	Document Note	Author	Date Issued
V1	Draft for Client and Planning Team review	James Bullock	12/03/2026
V2	Update for issue	James Bullock	12/03/2026

Disclosure:

This document has been prepared by BLADE Landscape Architects Ltd for the sole use of the commissioning client/s. It has been provided in accordance with the agreed scope and intended purpose. No other warranty is made as to the professional advice included in this document. It does not purport to give legal advice.

This report should not be copied or relied upon by any third party without the express prior written agreement of BLADE Landscape Architects Ltd and the commissioning client/s.

Where any appraisal is based upon information provided by third parties, it is assumed that this information is relevant, correct and complete; there has been no independent verification of information obtained from third parties unless otherwise stated.

Where field investigations have been carried out these have been appropriate to the agreed scope of works and carried out to a level of detail required to achieve the stated objectives.



CONTENTS

1.0	INTRODUCTION	4
	Introduction	4
	The Promotion Site	4
	The Purpose of this Landscape Position Note.....	4
2.0	RELEVANT PLANNING POLICY	6
	Landscape-related Designations and Other Considerations.....	6
	National Planning Policy Framework	6
	Adopted Local Plan.....	7
	Rugby Borough Council Local Plan Proposed Submission 2025-2042 (issued January 2026)	10
	Summary of the Rugby Borough Council's Area of Separation Study (published November 2025)	11
3.0	REVIEW OF THE LPA'S AREA OF SEPRATION STUDY METHODOLOGY.....	13
4.0	THE RUGBY-DUNCHURCH-THURLASTON AREA OF SEPARATION	17
	Introduction	17
	Site-Specific Appraisal	17
	Settlement Identity	17
	Physical and Visual Separation.....	21
	Urbanising Influences.....	22
5.0	THE CURRENT FUNCTION OF THE PROMOTION SITE	24
6.0	CONCLUSION	26
	 APPENDIX BLADE 1	 28
	Site Location Plan	28

1.0 INTRODUCTION

Introduction

- 1.1. BLADE Landscape Architects Limited ('BLADE') were commissioned on behalf of Warwickshire Property Development Ltd (the 'Promotor') to appraise the landscape baseline for land at Homestead Farm. This land is located on the western edge of Dunchurch, CV22 6RE. This appraisal demonstrates the suitability of this land for a new employment development.
- 1.2. This appraisal facilitates an independent technical evidence base for the Site's promotion through the Local Plan process. The assessment was informed by a desk-based review of available data, policy, landscape character publications and mapping, as well as the Area of Separation Study published by Rugby Borough Council in November 2025. A site visit was undertaken by a member of BLADE's Landscape Team in February 2026.

The Promotion Site

- 1.3. The land is situated at Homestead Farm, situated south of the Coventry Road on the western edge of Dunchurch (the 'Promotion Site'). The site is located at OS Grid Reference: SP 46124 71382 (site centre); see Appendix BLADE 1.
- 1.4. The Promotion Site is made up of two interconnecting fields which are managed for equestrian pasture. The Coventry Road runs to and from Dunchurch along the northern edge of the Site, whereby field access is afforded. The land is enclosed by existing residential development at Done Cerce Close (east) and residential dwellings on the Coventry Road to the west.
- 1.5. Homestead Farm is situated to the south of the Coventry Road, with open fields to the south, beyond which is the M45 Motorway. The wider village of Dunchurch extends easterly along the Coventry Road, which is one of the main vehicle routes into the centre of the village where it meets the Daventry Road, Southam Road and the Rugby Road along which are extensive residential development and village related land uses, with residential streets thereof.
- 1.6. Symmetry Park, a collection of distribution and employment buildings and land uses are located circa 1.25km west of this location.
- 1.7. The Promotion Site is located within the administrative area of Rugby Borough Council (the 'LPA').

The Purpose of this Landscape Position Note

- 1.8. This document is primarily focused in responding to the proposed Policy EN 4 of the Rugby Borough Council Local Plan Proposed Submission 2025-2042 (issued January 2026), and the inclusion of the Promotion Site within Area of Separation between Rugby-Dunchurch

-Thurlaston, and examines the site's suitability for future development to demonstrate that the development of this land is both sustainable and appropriate.

- 1.9. The whole quantum of the Promotion Site is within the control of the Promotor and forms the basis of the site representation to the Local Planning Authority as part of their 'Call for Sites'. The location of this land is shown on the Site Location Plan contained within Appendix BLADE 1 of this document.
- 1.10. Rugby Borough Council's Local Plan has reached Regulation 19, the final stage before government examination. Linked to this, the LPA are proposing a policy area called Area of Separation, which is contained within their Regulation 19 Policy EN4.
- 1.11. Policy EN4 is titled 'Areas of Separation' which has the aim of 'protecting the identity and distinctiveness of settlements and preventing their coalescence', whereby development in these areas will only be permitted that do not have a 'significant adverse impact, either alone or in combination with other existing or proposed development'. The policy is supported by an evidence base prepared by Rugby Borough Council titled the 'Area of Separation Study', which this Landscape Technical Note considers.

2.0 RELEVANT PLANNING POLICY

2.1. The findings of the relevant environmental and planning designations are summarised in this section. The following documents are relevant and will be discussed as appropriate later in this section:

- National Planning Policy Framework Revision (revised December 2024);
- Rugby Borough Council Local Plan 2011-2031 (adopted June 2019);
- Rugby Borough Council Local Plan Proposed Submission 2025-2042 (issued January 2026)
- Rugby Borough Council's Area of Separation Study (published November 2025).

2.2. The location of the Promotion site is situated outside of an adopted and made Neighbourhood Plan; therefore, on this occasion, the Promotion Site cannot be reviewed against pertinent policies and design codes that might be presented by the Parish Council.

Landscape-related Designations and Other Considerations

2.3. With consideration of the Rugby Borough Council's Local Plan 2011-2031 (adopted June 2019), BLADE finds the following:

- *National landscape designations:* The site does not lie within, adjoin, or is close to a Nationally designated landscape such as a National Landscape (formerly an Area of Outstanding Natural Beauty) or National Park. The site is not situated within the Green Belt.
- *Local landscape designations:* The site does not lie within, adjoin, or is close to a locally designated landscape, such as a Green Space or Special Landscape Area.

2.4. Consequently, given the foregoing the site is not afforded elevated protection under National and local planning policy (in landscape terms).

National Planning Policy Framework

2.5. The NPPF was updated in December 2024 and sets out the Government's planning policies for England and how these should be applied. At the heart of the NPPF is a presumption in favour of sustainable development.

- 2.6. The NPPF Para 131 states that *"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities"*.
- 2.7. Para. 136 states that *"new streets [should be] tree-lined", and "that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible"*.
- 2.8. Paragraph 187 notes that the *"intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services"* should be recognised. Paragraph 188 makes it clear that there is a hierarchy to the importance and value attributed to landscapes, and that the development plans should distinguish between these and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.
- 2.9. Relevant Planning Policy Guidance that accompanies the NPPF includes that relating to Green Infrastructure, Landscape, and Design (including the National Design Guide).

Adopted Local Plan

- 2.10. The Rugby Borough Council Local Plan outlines planning policies and proposals for new development to ensure that Rugby is a great place to live, work, and do business. The plan is prepared in consultation with residents and stakeholders, and councils must review their Local Plan every five years.
- 2.11. The current Local Plan covers the period from 2011 to 2031 and includes strategic planning policies and detailed development management policies. Additionally, a recent 'issues and options' consultation was conducted to gather views on key issues and options for new policies.
- 2.12. Their Local Plan was adopted in June 2019 with the aim of providing a clear vision for how new development can address challenges and identifies where, when, how much and how new development will take place in the district up to 2031, and these policies are afforded appropriate weight.

Policy NE3

- 2.13. The main Landscape-derived policy is the Policy NE3 which is entitled 'Landscape Protection and Enhancement.' The purpose of Policy NE3 is to ensure that 'significant landscape features are protected and enhanced and that landscape design is a key component in the design of new development'.

2.14. This policy states the following:

- *'New development which positively contributes to landscape character will be permitted. Development proposals will be required to demonstrate that they:*
- *Integrate landscape planning into the design of development at an early stage;*
- *Consider its landscape context, including the local distinctiveness of the different natural and historic landscapes and character, including tranquillity;*
- *Relate well to local topography and built form and enhance key landscape features, ensuring their long term management and maintenance;*
- *Identify likely visual impacts on the local landscape and townscape and its immediate setting and undertakes appropriate landscaping to reduce these impacts;*
- *Aim to either conserve, enhance or restore important landscape features in accordance with the latest local and national guidance;*
- *Address the importance of habitat biodiversity features, including aged and veteran trees, woodland and hedges and their contribution to landscape character, where possible enhancing and expanding these features through means such as buffering and reconnecting fragmented areas; and*
- *Are sensitive to an area's capacity to change, acknowledge cumulative effects and guard against the potential for coalescence between existing settlements.'*

2.15. Consequently, Policy NE 3 is the main engaged Landscape-derived policy by which the proposed development would be assessed against. Further pertinent policies include:

Policy NE 2

2.16. Policy NE2 is entitled ' Strategic Green and Blue Infrastructure', and states the following:

- *'The Council will work with partners towards the creation of a comprehensive Borough wide Strategic Green and Blue Infrastructure Network which is inclusive of the Princethorpe Woodland Biodiversity Opportunity Areas (also known as the Princethorpe Woodlands Living Landscape), as shown on the Green and Blue Infrastructure Policies Map. This will be achieved through the following:*

- *The protection, restoration and enhancement of existing and potential Green and Blue Infrastructure assets within the network as shown on the Policies Map; and*
- *The introduction of appropriate multi-functional corridors between existing and potential Green and Blue infrastructure assets.*
- *Where appropriate new developments must provide suitable Green and Blue Infrastructure corridors throughout the development and link into adjacent strategic and local Green and Blue Infrastructure networks or assets where present.*
- *Where such provision is made a framework plan should be produced as part of the planning application demonstrating the contribution to the overall achievements of the multi-functional strategic Green and Blue Infrastructure network. A management plan, based on delivering the framework plan and detailing how the infrastructure will be managed, may be required by condition.'*

2.17. In support of this Policy, supplementary wording is provided by the LPA at paragraph 9.10 onwards of the adopted Local Plan, and states:

'Where new multi-functional corridors between existing Green and Blue Infrastructure (GI) assets are made from a development site a framework plan will be required which addresses how to achieve the balance of public access and the protection of the existing Green/Blue Infrastructure site's asset. The framework plan should be informed by the GI Study and factor in the following:

- *Indicative buffers for the important Green and/or Blue Infrastructure corridors which form part of the strategic networks such as watercourse corridors and disused railway lines;*
- *Retain sites of historic environmental value;*
- *Indicative buffers where required to protect important Green/Blue Infrastructure against adjacent developments;*
- *Retain valued semi natural habitats; and*
- *Set out the local network of Green/Blue Infrastructure and how it will be managed and developed.'*

Policy SDC 2

2.18. Policy SDC2 is entitled 'Landscaping' and states the following:

'The landscape aspects of a development proposal will be required to form an integral part of the overall design. A high standard of appropriate hard and soft landscaping will be required. All proposals should ensure that:

- Important site features have been identified for retention through a detailed site survey;*
- Features of ecological, geological and archaeological significance are retained and protected and opportunities for enhancing these features are utilised (consideration will also be given to the requirements of policies NE1 and SDC3 where relevant);*
- Opportunities for utilising sustainable drainage methods are incorporated;*
- New planting comprises native species which are of ecological value appropriate to the area;*
- In appropriate cases, there is sufficient provision for planting within and around the perimeter of the site to minimise visual intrusion on neighbouring uses or the countryside; and*
- Detailed arrangements are incorporated for the long-term management and maintenance of landscape features.'*

Rugby Borough Council Local Plan Proposed Submission 2025-2042 (issued January 2026)

Policy EN2

2.19. EN 2 is titled 'Landscape protection' and states the following (N.B. Underlining added by BLADE for emphasis):

A. Development shall avoid significant adverse impacts on landscape character and significant adverse visual impacts.

B. Development proposals must be located and designed to respect scenic quality and maintain a distinctive sense of place.

C. Development proposals must avoid detrimental impacts on landscape features which make a significant contribution to the character of the area or to the setting of a heritage asset or settlement'.

Policy EN 4

- 2.20. Policy EN 4 is titled 'Areas of Separation' and states the following (N.B. Underlining added by BLADE for emphasis):

'A. Areas of Separation are defined on the policies map between Rugby town and the settlements of Clifton upon Dunsmore, Dunchurch and Thurlaston.

B. Development will only be permitted in these areas when it will not have a significant adverse impact, either alone or in combination with other existing or proposed development, on the effectiveness of an Area of Separation in protecting the identity and distinctiveness of settlements and preventing their coalescence.

C. Developments that diminish physical and visual separation, have an urbanising influence, or which adversely impact settlement identity should be deemed as having an adverse impact on the effectiveness of an Area of Separation.

D. Applicants proposing development that may have an adverse impact on an Area of Separation must demonstrate that they have considered this impact and have incorporated appropriate mitigatory measures into their proposal'.

Summary of the Rugby Borough Council's Area of Separation Study (published November 2025)

- 2.21. In the foregoing, the LPA finds the Promotion Site to be located within the area referred to as the 'Rugby-Dunchurch-Thurlaston'; see Image BLADE 2.1:

Image BLADE 2.1: Extract from the Rugby Borough Council's Area of Separation Study (published November 2025), PDF page 20, Figure 5: Rugby-Dunchurch-Thurlaston assessment area. N.B. BLADE has marked the approximate location of the Site with a solid red circle



2.22. In their commentary of this area, the LPA states this area is considered as the '*separation between Rugby town and Dunchurch and Thurlaston*', which lies '*between the town and the two villages and is outside of the settlement boundaries as defined by the adopted local plan.*',

2.23. Within the area which the LPA are proposing for this Area of Separation, the LPA breaks the land down into a northern, central and southern area; which it refers to as Section A, B and C respectively. For the southern area (Section C), the LPA comments (N.B. Underlining added by BLADE for emphasis):

'Section C: The largest section of the assessment area is that to the west of Dunchurch and north of Thurlaston. This is comprised of farmland, allotments, isolated homes, and a garden nursery to the north of Coventry Road; dwellings, a church, farmland and paddocks to the south of Coventry Road; and Barnwells farm and a golf club driving range to the northwest of Thurslaston. It is intersected by the M45 and Coventry Road'.

2.24. Overall, the LPA does not afford a clear and direct conclusion on the importance of the proposed Rugby-Dunchurch-Thurlaston Area of Separation. However; in the absence of a clear conclusion, it is assumed that the LPA consider that the quantum of this area performs a significant role against the objectives of Policy EN 4 of the Rugby Borough Council Local Plan Proposed Submission 2025-2042 (issued January 2026).

3.0 REVIEW OF THE LPA'S AREA OF SEPRATION STUDY METHODOLOGY

- 3.1. Having reviewed the LPA's methodology contained in their Area of Separation Study (November 2025), BLADE considers that their methodology is rather 'wishy-washy' and lacking clarity and definition.

- 3.2. In terms of policy – the pertinent (adopted) policy is Policy NE3: Landscape Protection and Enhancement for which the LPA states at paragraph 4.1 of the Area of Separation Study, the following:

'The adopted Rugby Borough Council Local Plan does not contain any policies that are intended to maintain designated areas of separation between the town and nearby villages. However, Policy NE3: Landscape Protection and Enhancement (p.76) does require development proposals to "guard against the potential for coalescence between existing settlements" and "aim to either conserve, enhance or restore important landscape features", which, in the case of areas between the town and nearby villages may potentially include landscape features that contribute towards the degree of settlement separation'.

- 3.3. Notwithstanding this, the Local Plan Proposed Submission, Policy EN4 Areas of Separation does not rule out new development within an Area of Separation, allowing for development to be mitigated – see section d of this policy which states:

'D. Applicants proposing development that may have an adverse impact on an Area of Separation must demonstrate that they have considered this impact and have incorporated appropriate mitigatory measures into their proposal'.

- 3.4. Consequently, development could be permitted so long as it does not have a detrimental effect on the sense of separation, and/or this development could be mitigated through a well-design scheme, and so the identify of settlements can remain whilst the function of the area of separation remain functional.

- 3.5. Given this, BLADE considers that the Local Plan Proposed Submission, specifically Policy EN4 is focussed on avoiding coalescence and retaining the separate identity of settlements; rather than protecting high quality landscapes on the urban fringe and provide access to the countryside – this is reflected by Point B of the policy which states:

'B. Development will only be permitted in these areas when it will not have a significant adverse impact, either alone or in combination with other existing or proposed development, or the effectiveness of an Area of Separation in protecting the identity and distinctiveness of settlement and preventing their coalescence'.

- 3.6. It is appreciated that there is no Nationally adopted methodology for such a study, and this is recognised by the LPA in their Area of Separation Study (Nov 2025); see paragraph 3.4.

- 3.7. However, there is a lack of defining the scope and purpose of the study. Having reviewed the Method for the Aea of Separation, BLADE considers that this study lacks the following:

The Qualifications and Experience of who undertook the Study and its Field-Based Work

- 3.8. The Methodology and Approach does not confirm who undertook the assessment and field-based assessment, their qualifications and experience i.e., Planner, Masterplanner, Landscape Architects?

When was the Field-Based Assessment undertaken.

- 3.9. The Methodology and Approach does not confirm Time of year when the field-based assessment was undertaken.

Lack of Assessment Criteria

- 3.10. The methodology does not provide an assessment criteria for the '*identity and distinctiveness of settlement*' – only asserting that the evaluation of settlement identity 'primarily relies upon information drawn from conservation area appraisals and parish or neighbourhood plans' (paragraph 5.6). This approach lacks clarity and transparency and does not provide a criterion for an independent assessment of higher function to lower function land.
- 3.11. Whilst, the LPA does go on to list a criterion by which land within an assessment area is deemed to make a stronger contribution to settlement identity'. The following is the only criteria which they list:
- *'It is an important part of a settlement's setting;*
 - *It features prominently in the views to and from the settlement;*
 - *It provides a clear sense of arrival to or departure from the settlement; or,*
 - *It contributes positively to a conservation area'.*
- 3.12. However, this approach lacks transparency and a scoring mechanism for examination. This is a deficiency i.e., how did the LPA, or an independent assessor, define less than a 'stronger contribution'.
- 3.13. Unfortunately, this situation further replicated through the LPA's methodology for examining the Physical and Visual Separation and Urbanising Influences. Again, the LPA attempt to only define 'stronger contribution'.

- 3.14. Given this, it is clear there is a lack of clarity and the methodology is inadequate in its breadth and definition to only support not stronger or stronger contributions. Consequently, the methodology does not demonstrate how the relative importance of land parcels have been defined through a lack of terms.

Lack of Clear Conclusion – Broad Area

- 3.15. The LPA identifies larger, broad areas of land which it is recommended form part of the Aea of Separation. From reviewing the Section 7, the LPA provide no clear analysis for the scoring of the land's importance, and consequently conclusion of its justification to include the relative land within the Aea of Separation. For instance; why does this land make a 'stronger contribution'. This is a deficiency.

Lack of Clear Conclusion – Smaller Land Parcels within the Broader Area

- 3.16. Within the larger, broad areas, the LPA identified a number of small land parcels, which it refers to Section A, B and C, and then reduces the scale of these further with smaller areas, which it provides a numerical reference for. For instance; why does this land make a 'stronger contribution'. This is a deficiency.
- 3.17. However, the LPA provides no evidence of an assessment of these areas, which combined with the lack of any clear conclusion for the broader Area of Separation, makes the study confusing an clacking in evidence. This is a deficiency.
- 3.18. In summary, the following deficiencies are noted within the LPA's methodology for their Area of Separation:
- The published Methodology/Approach is deficient, lacking in the definition of terms, and their detail of terms.
 - The LPA's methodology is insufficiently explained and lack clarity for an independent assessment.
 - The use of the published Methodology/Approach in the 2025 seems to have been used to only support higher contribution land (in order to support their justification of the enforcement of the Area of Separation advocated by the LPA).
 - The Methodology lacks detail and appears to be poorly explained and is insufficiently robust.
 - There is a lack of defining the scope and purpose of the study.

- Who undertook the assessment and field-based assessment, their qualifications and experience i.e., Planner, Masterplanner, Landscape Architects?
 - Time of year when the field-based assessment was undertaken?
 - Lack of any clear conclusive statement relative to the broad area of land within the proposed Area of Separation, the smaller Section A, B and C areas, as well as the smaller land areas numerically referenced.
- 3.19. Overall, BLADE concludes that the LPA does not provide a fully detailed Methodology with individual criterion for assessing land within the proposed Areas of Separation, and fails to provide a scoring mechanism for its contributions. Given this, BLADE considers that the LPA's methodology is rather 'wishy-washy' and lacking clarity and definition, and its application is not transparent in its judgement.

4.0 THE RUGBY-DUNCHURCH-THURLASTON AREA OF SEPARATION

Introduction

- 4.1. The Promotion Site is situated within the proposed Rugby-Dunchurch-Thurlaston Area of Separation to the western edge of Dunchurch village.
- 4.2. Given that the LPA has not published its appraisal of smaller land parcels, or the southern part of this area (Section C) individually, we must consider that the stated level of contribution is that of the broad area.

'The role that the area between Rugby and Dunchurch and Thurlaston plays in separating the settlements will be diminished once the South West Rugby urban extension is built. Nevertheless, substantial open areas remain which are important for maintaining some degree of separation'.

- 4.3. In their description, the LPA recognise a number of existing urban, developed land and infrastructure features; which influence the setting of the Promotion Site; these include:
 - A45 Coventry Road;
 - Thurlaston Interchange on the A45 Coventry Road with Symmetry Park situated off with extensive employment and distribution built form and infrastructure;
 - Symmetry Park with its extensive distribution and employment buildings and land uses with its road infrastructure;
 - Neighbouring residential dwellings, and the wider village of Dunchurch.
- 4.4. From the Area of Separation Study (November 2025), the LPA consider the proposed Rugby-Dunchurch-Thurlaston Area of Separation makes a 'stronger contribution' for i). Settlement Identity; ii). Physical and Visual Separation; and iii). Urbanising Influences.

Site-Specific Appraisal

- 4.5. From our field-based assessment, BLADE considers each one of these categories as follows:

Settlement Identity

- 4.6. The Promotion Site neighbours the western edge of Dunchurch village, situated off the main roadway running to and from the village to its west. The land is located between existing residential development with further residential development located to the south (beyond the Site) along Brook View, with a village school (Dunchurch Boughton Church of England School) situated to the southeast.

- 4.7. Under the heading of Settlement Identity (for Dunchurch), the LPA states N.B. Underlining added by BLADE for emphasis):

'Dunchurch is a historic village with a conservation area that covers around a quarter of the settlement area and consists of three sub areas: a historic core centred around the village crossroads, a northern section comprising historic and modern development combined with areas of open space, and a small group of cottages located on 'The Heath'. The conservation area encompasses 35 listed buildings and numerous other non-designated buildings of historic importance. Outside of but in close proximity to the boundaries of both the settlement and the conservation area there are numerous other heritage assets, most notably the registered parks and gardens of Bilton Grange School and Dunchurch Lodge and their associated buildings.

The village has grown substantially in the last 100 years, with modern housing developments being constructed to the south (Sandford Way and The Hall Close), to the west (Done Cerce Close and Adkinson Avenue), and to the north (Bilton Lane and the roads branching off it).

As a result of modern development, there is no intervisibility between the conservation area and the open countryside that lays to the west and north of the village (towards Rugby town and Thurlaston). Nevertheless, the presence of rural surroundings on all approaches to the conservation area is considered to be of importance to its setting'.

- 4.8. This appraisal is made by the LPA for the whole of the southern part of the Rugby–Dunchurch and Thurlaston Area of Separation; rather than providing a site-specific assessment. The Section C area is a broad, tract of land, and whilst the LPA do not provide a map or plan defines each of Section A, B and C, Section C covers an extensive area.

- 4.9. BLADE notes the following from the LPA's assessment:

It is an important part of a settlement's setting

- 4.10. The LPA states the following:

'As a result of modern development, there is no intervisibility between the conservation area and the open countryside that lays to the west and north of the village (towards Rugby town and Thurlaston). Nevertheless, the presence of rural surroundings on all approaches to the conservation area is considered to be of importance to its setting'

- 4.11. The Promotion Site lies on land that is directly adjacent to multiple neighbouring residential curtilages. When on Site, especially in winter time, one is aware of the presence of the surrounding village related land uses, albeit on the edge of village, rather than feeling divorced from it in the open countryside

- 4.12. In a landscape and village character sense, this built form, and the wider village environment which can be seen from the site area which reinforces the peri-urban/village edge location. This is particularly the case, when one considers the limited visual envelope for the land. The site is enclosed by this residential development and robust field hedgerows.
- 4.13. Consequently, the Promotion Site is not prominent in views to and from the village or seen from the wider village. Given this, BLADE judges that the land at the Promotion Site is not an important part of a settlement's setting.

It features prominently in the views to and from the settlement

- 4.14. BLADE notes that the LPA provide no direct appraisal of how the proposed Area of Separation influences views to and from the settlement, or how intervisible this area is from the village.
- 4.15. From our field-based assessment, BLADE would agree that there would be no intervisibility between the Promotion Site and the central areas of the village (around the Conservation Area). Additionally, the land is situated between residential development and the existing village school (to its east and southeast) with the Site enclosed by housing to the west on the Coventry Road.
- 4.16. From our field-based assessment, there is a limited visual envelope for the land. The site is enclosed by this residential development and robust field hedgerows. The countryside beyond the village further along the Coventry Road and along its western edge between Dunchurch and Thurlaston is experienced as broad and open with a much larger scale than the site area. This contrast reinforces the site's village edge location, but is not a significant roadside location on the approach to and from the village along the Coventry Road.
- 4.17. The Site is experienced as open land managed for equestrian activities to the village edge, yet set within housing; rather than isolated in open countryside between Dunchurch and Symmetry Park.

It provides a clear sense of arrival to or departure from the settlement

- 4.18. BLADE notes that the LPA provide no direct appraisal of how the proposed Area of Separation would be experienced passing to and from Dunchurch along the Coventry Road, or when walking along the local Public Right of Way network.
- 4.19. From our field-based assessment, BLADE notes the following:
- Generally, the Promotion Site is not seen when travelling along the A45/M45 route passing east to west (south of the Site). This is due to the enclosed nature of this route with extensive belts of trees lining its route, as well as the linear woodland blocks on the northern side off the route, intervening field hedgerows, hedge line trees and the well tree'd edge to the southwest-western village edge.

- Main Street travelling north from Thurlaston village is the only one entrance into and out of the village. This route passes via the bridge across the A45/M45. When passing along Main Street through the village, there is little if any opportunity to look across to the Promotion Site. The Thurlaston Conservation Area is situated in the core of the village, and is compacted and has an enclosed and restricted nature due to the linear arrangement of built form along Main Street. To the north, there is a short section of Main Street running beyond the village and across the A45/M45. This route is enclosed by lines of extensive trees restricting direct views across to the Promotion Site.
 - Toft Hill traveling northwards to the village of Dunchurch is a route frequently enclosed by extensive roadside hedgerows and hedge line trees as well as small woodland clumps/blocks aligned to the roadway, as well as existing dwellings wayside to the route. The southern edge of Dunchurch is further enclosed by tree group and woodland blocks within the short distance between the village and the A45/M45 route.
 - Windmill Lane travels northwards from the Coventry Road and passes to the northwest-northern edge of Dunchurch. National Cycle Route 41 passes along this narrow lane, and then along Coventry Road. This route is enclosed by lines of extensive trees, robust hedgerows and numerous hedge line trees restricting direct views across to the Promotion Site.
- 4.20. Given the foregoing, it is only users of the Coventry Road who would experience the Promotion Site as they pass to and from the village. However, the Promotion Site sits comfortably between existing residential dwellings and Coventry Road with further residential development projecting further west, and enclosing the Promotion Site on this side.
- 4.21. In combination, these features help to define a perceived transition from open countryside (in a landscape sense) to the built core of the village. Along the Coventry Road, this land is experienced as being on the village edge but sandwiched between existing residential development, and it is seen fleetingly by road users.

It contributes positively to a conservation area

- 4.22. BLADE notes that the LPA appraisal states:

'As a result of modern development, there is no intervisibility between the conservation area and the open countryside that lays to the west and north of the village (towards Rugby town and Thurlaston). Nevertheless, the presence of rural surroundings on all approaches to the conservation area is considered to be of importance to its setting'.

- 4.23. Given this, BLADE judges that the Promotion Site is not prominent in its position relative to the Conservation Area, and views to the Promotion Site are not intrinsically important to the character of the Conservation Area.

Physical and Visual Separation

- 4.24. From the observations of the whole area, the LPA states the following N.B. Underlining added by BLADE for emphasis):

'The gap between Rugby town and Dunchurch and Thurlaston varies in length and will be significantly changed once the South West Rugby urban extension is built out. Presently, there is around 300m between the north of Dunchurch (Northampton Lane) and the south of Rugby (Montague Road) which will be reduced to around 100-150m once South West Rugby is constructed. Thurlaston is currently around 1.6km from the settlement boundary of Rugby at its nearest point (between Main Street and Cawston Lane) but is only c. 350m from the Symmetry Park industrial estate which forms part of the South West Rugby allocation'.

- 4.25. Owing to the Promotion Site's location development would not foreshorten the anticipated gap between Dunchurch and South West Rugby urban extension. Additionally, the Site is enclosed by existing residential development along its western edge, which also extends along the Coventry Road. Consequently, development at the Site would not foreshorten the existing gap between Dunchurch and Symmetry Park as one travels along this route to and from the village.

- 4.26. The LPA continues:

'Dunchurch is very well connected to Rugby via three roads: the A426/Rugby Road (connecting to Dunchurch Road and Ashlawn Road), Alwyn Road and Cawston Lane. Rugby Road is a busy A road (A426) that features a designated cycle track, is on the route of bus services, and acts as the primary vehicular connection'.

- 4.27. The aforementioned routes are situated on the northern and eastern side of Dunchurch, and development to the west of Dunchurch on the Coventry Road (within the Promotion Site) is considered by BLADE to be indiscernible due to the intervening village related built form and land uses. Development at the Promotion Site would not foreshorten the existing gap between Rugby and Dunchurch in this regard.

- 4.28. The LPA continues and states:

'Given that the land between Dunchurch and Rugby is reasonably flat, intervisibility between the two settlements is limited to the vantage points which are not obscured by vegetation. These are primarily found in the area that lays between the western half of Northampton Lane in the north of the village (between Cawston Lane and Alwyn Road) and the southernmost parts of the town (along Alwyn Road and Montague Road). Once South West Rugby is built the areas of intervisibility may be expanded, depending on how the urban extension is landscaped and screened'.

4.29. Given our field based assessment, we note that the Promotion Site is situated to the western edge of the village and away from these locations.

4.30. From our field-based assessment, we note the following relative to the LPA's criteria:

It contributes to a broad gap between settlements

4.31. No, the Promotion Site does not contribute to the broad gap between settlements. The Site is enclosed by existing residential development, which extends further west along the Coventry Road, and it is generally indiscernible to road users passing along other roads locally between Rugby and Dunchurch and Dunchurch and Thurmaston.

It has land cover or a topography which restricts intervisibility between the settlements

4.32. BLADE notes the LPA's own conclusion that *'to the north of Northampton Lane (Section B), the only physical feature separating the village (Dunchurch) from the town (Rugby) are the mature trees and vegetation that run along the field boundaries. Once the Homestead Link Road has been constructed, it is expected that this, and the landscaping and planting around it, shall also act as a physical feature of separation'*. The Site is located beyond this area within the western approach to the village, and is enclosed by residential development.

4.33. Additionally, the LPA notes *'as a result of modern development, there is no intervisibility between the conservation area and the open countryside that lays to the west and north of the village (towards Rugby town and Thurlaston)'*; therefore, there is no intervisibility between the village and the Site on its western edge.

4.34. The route of the A45/M45 routes is well enclosed by extensive tree groups along its route, as well as tree groups and woodland to the north of this route.

It does not contain direct vehicular links between settlements

4.35. The Promotion Site does not direct vehicular links between settlements. A future development at the Promotion Site would not necessitate a new roadway. The Site adjoins the Coventry Road, which would be utilised for a new access for future development.

Urbanising Influences

4.36. From the observations of the whole area, the LPA states the following N.B. Underlining added by BLADE for emphasis):

'There is little sense of departure and arrival when travelling between Dunchurch and Rugby along Alwyn Road, given that residential dwellings of both settlements can be seen at nearly all times, and it is expected that the situation shall be similar for Cawston Lane once South West Rugby is built out. There is a clearer sense of departure and arrival when travelling along the A426, although the edges of at least one of the two settlements can be seen at all times.'

The land to the west of Dunchurch and north of Thurlaston (Section C) is primarily occupied by farmland, paddocks, allotment gardens, and areas of low-density housing of a rural or semi-rural character. However, there are also significant urbanising influences, including the M45, Coventry Road, and the warehouses of Symmetry Park.

There is a reasonably clear sense of departure and arrival when travelling between Thurlaston and Dunchurch, enhanced by the enclosure of the northern part of Main Street and much of Coventry Road by open countryside. However, the ribbon development that is encountered to the west of the boundary of Dunchurch (on the southern side of Coventry Road) has a minor urbanising influence and weakens the clarity of the village boundary'.

- 4.37. BLADE observes the following from our field-based assessment:

It lacks any development, or the development which exists is rural in character

- 4.38. The Site is experienced as open land managed for equestrian activities to the village edge, yet set within housing; rather than isolated in open countryside between Dunchurch and Symmetry Park.
- 4.39. Development at the Site would be experienced as contained within the existing residential development to the western edge of the village, and would be extending beyond the existing built form further west along the Coventry Road. This enclosure would contain development and not lead to ribbon form along the roadway away from the village in the wider open countryside setting to Dunchurch.

It lacks infrastructure associated with human activity

- 4.40. The Site is managed for equestrian pasture. The Site does not contain development or previous built form. However, the Site is enclosed by residential development to two of its boundaries, as well as main vehicle route to its northern edge with residential development along.

It has natural or semi-natural land uses, such as woodland or wetlands

- 4.41. The Promotion Site is managed for equestrian pasture, and is enclosed by a combination of native field hedgerows with hedge line trees, as well as residential curtilage to its east and western edge. The field scale is smaller than those found outside of the village and Dunchurch and Thurlaston and Dunchurch and Symmetry Park to the southwest and west.

5.0 THE CURRENT FUNCTION OF THE PROMOTION SITE

- 5.1. The Site is situated within the proposed Rugby-Dunchurch-Thurlaston Area of Separation which covers the wedge of land between Rugby town and Dunchurch and Thurlaston and consists of the entirety of the area that lays between the town and the two villages; see Image BLADE 2.1 and 4.1 above.
- 5.2. The evidence base makes it clear that Thurlaston and Dunchurch are not physically and perceptually connected to Rugby in the north, with these villages located outside of the town's settlement boundaries as defined by the adopted Local Plan – excluding the South West Rugby urban extension allocation (which has yet to be built out).
- 5.3. The additional development at the South West Rugby urban extension allocation to the north of the A45/M45 and Symmetry Park within its extensive employment and distribution buildings will result in the extent of the urban area projecting beyond the town edge of Rugby and extend south towards Symmetry Park.
- 5.4. The Area of Separation Study (November 2025) Green Gap Study highlights the gap between Rugby-Dunchurch-Thurlaston is *'relatively weak due to the proximity of the settlements and the presence of urbanising influences within the assessment area. Furthermore the construction of the South West Rugby urban extension is likely to diminish the gap further'*.
- 5.5. The evidence base highlights the importance of the land to the north of the A45/M45, and whilst the Promotion Site is located within this (albeit on the peripheral edge), it lies on land that is directly adjacent to multiple neighbouring residential built form and curtilages which enclose the Site.
- 5.6. From a landscape and village character perspective, the domestic curtilages (Coventry Road) contribute to the village character and are perceived as part of the village. Additionally, the Coventry Road is not an unbreeched boundary. Development is already present on the northern boundary of the road to create an established collection of houses, a large public allotment, as well a small number large, detached dwellings with domestic curtilages aligned to this roadway
- 5.7. Additionally, the evidence also highlights that this *'open countryside to the north of Coventry Road and the mature trees along the field boundaries which shall act to separate Dunchurch and Thurlaston from the South West Rugby urban extension'*.
- 5.8. However, the Promotion Site is situated within a pocket of open land which is enclosed by residential development, and within man-made and natural features which the LPA considered to be important in their review to define the Area of Separation and ensure that existing settlements retain their own identity and do not coalesce.

- 5.9. Given the foregoing, and how the Promotion Site is essentially locked inside existing built form and the Coventry Road, this land is not experienced as part of the wider open countryside within the proposed Area of Separation, and is not prominent in views of, or travelling into and out of Dunchurch, or is it important to the setting of the village.
- 5.10. Consequently, it is considered that the land at the Promotions makes a negligible contribution to the function of the much wider proposed Area of Separation.

6.0 CONCLUSION

- 6.1. Policy EN4 of the Rugby Borough Council Local Plan Proposed Submission 2025-2042 (issued January 2026), states that there are two purposes to the proposed Areas of Separation; those being:
- Protecting the identity and distinctiveness of settlements; and
 - Preventing the coalescence of settlements.
- 6.2. Policy EN 4 'Areas of Separation' states that development proposals will only be considered favourably where:
- It will not have a significant adverse impact, either alone or in combination with other existing or proposed development, on the effectiveness of an Area of Separation.
 - It will not diminish physical and visual separation, have an urbanising influence, or which adversely impact settlement identity.
- 6.3. It is noted that Policy EN 4 does recognise that Applicants proposing development '*that may have an adverse impact on an Area of Separation must demonstrate that they have considered this impact and have incorporated appropriate mitigatory measures into their proposal*'.
- 6.4. Notwithstanding concerns expressed earlier in this Landscape Technical Note regarding the LPA's Methodology, BLADE has examined the Promotion Site against the LPA's Methodology criteria, and so determine the likely impacts from the development of the Site upon the potential function of the proposed Area of Separation. This is set out below:
- 6.5. It is judged by BLADE, that development at the Promotion Site would not result in the physical, visual or perceptual merger of Rugby- Dunchurch – Thurlaston, and would still enable the meaningful performance of the wider Area of Separation as being proposed, and compliance with Policy EN4.
- 6.6. As demonstrated, a future development at the Promotion Site would not result in the physical or visual merger of the settlements and there will remain a clear experience of leaving one settlement before entering the other, as well as maintaining the character of each settlement.
- 6.7. As demonstrated above, the land at the Promotion Site has limited relevance to the wider proposed Area of Separation; being locked inside multiple residential curtilage and at the main western approach road into the village.

- 6.8. However, if developed, the new built form would be retained within these robust edges and would not extend along the Coventry Road into the open countryside beyond and so not lead to ribbon type development beyond the perceived built limits of the village. Consequently, the land's purpose to prevent settlements coalescing is limited to benign in its contribution.
- 6.9. Whilst, a future development would result in a physical encroachment into the area surrounding the village, as would be expected with greenfield development. However, landscapes are not experienced in two dimensions on mapping, but on the ground when passing through the area. A future development at the Promotion Site can be designed to set new built form within its extensive boundaries, retaining, bolstering and enhancing existing landscape fabric.
- 6.10. In conclusion, the Promotion Site affords little, if any contribution to the provision of the proposed Rugby-Dunchurch-Thurlaston Area of Separation. Moreover, the control of new development at the Promotion Site can be controlled through the landscape pertinent policies of the engaged local planning policy, as well as through the adoption of policy EN2 of the Rugby Borough Council Local Plan Proposed Submission 2025-2042 (January 2026).
- 6.11. In this Landscape Technical Note, we have expressed our concerns on the Methodology and Approach of the Rugby Borough Council's Area of Separation Study (published November 2025), which seem poorly explained, lacking in clarity and deficient, lacking in the definition of terms, and their detail of terms.
- 6.12. In any case, it is clear that the Promotion Site provides little if anything to preventing the coalescence of Rugby-Dunchurch-Thurlaston relative to Policy EN 4 of the Rugby Borough Council Local Plan Proposed Submission 2025-2042. Consequently, the omission of the land at the Promotion Site as part of the proposed Area of Separation would not impact the ability of the Area of Separation to function well.

APPENDIX BLADE 1

Site Location Plan



Warwickshire
County Council

1:1,250 at A4

Property Management, Resources Directorate
Warwickshire County Council, Shire Hall Warwick CV34 4RL

© Crown Copyright and database right 2026. Ordnance survey AC000019520

0 20 40 m

3029 - Land at Homestead Farm (South)



11.03.2026

User: DMIL5

QGIS 3.40.5-Bratislava

30 ST GEORGES SQUARE
WORCESTER
WR1 1HX

01905 947558
info@weareblade.co.uk
www.weareblade.co.uk

BLADE Ecology Ltd. Registered in England and Wales Number 13084460. VAT 384 3366 75.
BLADE Landscape Architects Ltd. Registered in England and Wales Number 11068394. VAT 288 9595 14.
BLADE Trees Ltd. Registered in England and Wales Number 13385589. VAT 387 2462 66.
Registered Office: 30 St Georges Square, Worcester, WR1 1HX.

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		Mrs
First Name		Sandra
Last Name		Ford
Job Title (where relevant)		Planning Director
Organisation (where relevant)	Warwickshire Property
and Development Group	Marrons
Address Line 1		Bridgeway House
Line 2		Bridgeway
Line 3		Stratford-upon-Avon
Line 4		Warwickshire
Post Code		CV37 6YX
Telephone Number		
E-mail Address		Sandra.Ford@marrons.co.uk

(where relevant)

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

Name or Organisation:

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

Paragraph

Policy

S2

Policies Map

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

No

(2) is Sound

Yes

No

(3) complies with the
Duty to co-operate

Yes

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.

1. Not sound

2. The housing requirement and supply within Policy S2 is not positively prepared, justified, effective, or consistent with national policy having regard to the following evidence.

3. In respect of Policy S2 Part A. Housing Requirement, the Plan fails to identify an appropriate housing requirement for the following reasons:

Plan Period

4. The Plan period to 2042 will not look ahead over a minimum of 15 years from adoption. The LDS assumes adoption by June 2027. 15 years from June 2027 is June 2042. Rugby undertakes its housing monitoring in April of each year, and its housing trajectory therefore only projects and plans for housing delivery until March 2042. There will not therefore be a 15 year plan period.

Local Housing Need

5. National planning practice guidance is clear that the Local Housing Need derived from the Standard Method may only be relied upon for a period of two years from the time the Local Plan is submitted for Examination. It would therefore be prudent for the Council to review the housing requirement calculated utilising the Local Housing Need derived from the Standard Method prior to Submission.

Unmet Housing Needs

6. The Council needs to ensure they have considered accommodating unmet housing needs arising from outside of the Borough to ensure compliance with the Duty to Cooperate and to ensure that the New Local Plan can meet the positively prepared soundness test set out in Paragraph 36 of the Framework.
7. The adopted Rugby Local Plan provides 2,800 dwellings to meet the unmet needs of Coventry until 2031. Whilst the emerging Coventry Local Plan Review is not envisaging declaring unmet needs for housing, this will need to be monitored prior to submission of the Plan and through the Examination.

Demographic Growth

8. The first Office for National Statistics (ONS) local authority household projections (2022-based) in over five years were published on 28th October 2025, based on the 2022-based Sub National Population Projections (SNPP, 24th June 2025).
9. As they are linked to the 2021 Census the projections are not affected by the overestimating issues identified for the 2014-based household projections which formed the baseline need of the 2023 NPPF's standard method.
10. In the context of the NPPF and emerging NPPF stating how the housing requirement could exceed standard method need, and these projections being the most recent, there is justification to consider them in respect of Rugby

2022-based ONS Household Projections – Rugby

11. The 2022-based household projections incorporate several variant projections, and we consider these below. It should be noted that ONS recommend use of the ‘migration category variant’ projections scenario. This is because the ONS explain that it better reflects international migration patterns.

12. The additional variant projections are as follows:

- a five-year migration variant (consistent with the national population projections principal projection)
- a 10-year migration variant
- a high international migration variant
- a projected household representative rates (HRR) variant, projected throughout
- a low international migration variant
- a zero net migration variant

13. Table 3.1 lists the projections for Rugby over the proposed Plan period.

Table 3.1: 2022 Household Projections for Rugby, 2025-2042

Variant Projection	2025 Households	2042 Households	Households 2025-2042 (per annum)	Dwellings 2025-2042 (per annum)
High international migration	50,004	65,107	15,103 (888)	15,556 (915)
Five-year migration	49,982	62,406	12,424 (731)	12,797 (753)
Migration variant	49,887	61,781	11,894 (700)	12,251 (721)
Ten-year migration	49,858	61,117	11,259 (662)	11,597 (682)

Low international migration	49,955	59,207		9,252 (544)	9,600 (561)
HRRs projected throughout	49,537	59,056		9,519 (560)	9,805 (577)

Source: ONS

14. ONS' preferred projection is highlighted yellow and projects 700 households per annum (hpa), 2025-2042. A vacancy rate of 3% in Rugby is applied to arrive at 721 dwellings per annum (dpa), 2025-2042. This would equate to 85 additional dpa, and 1,445 additional dwellings over the proposed Plan period.
15. However, the five-year migration trend scenario would lead to an additional 1,989 dwellings over the Plan period, and the high international migration scenario, 4,743 additional dwellings.
16. The 10-year migration scenario is lower than the ONS' preferred migration variant but would still require an uplift of 782 dwellings over the Plan period.
17. Only the low international migration variant, and the variant where household representative rates (an unlikely scenario) show a lower need than the 636 dpa proposed as the housing requirement in the Draft Plan.
18. The low international migration variant assumes positive net international migration of 108,500 people per annum across the country from the year ending 2030. This should be considered in the context of net international migration to the UK which has only ever been recorded at that number or below in three quarters since 2012. All three quarters where the figure was lower included the COVID-19 Pandemic period when international travel was severely restricted.
19. Furthermore, since the end of the COVID-19 Pandemic net international migration has been a minimum of 204,000 people and a maximum of 944,000 people. The average has been 610,000 people.

20. Since 2012 the average has been approximately 370,000 people per annum on average.
21. The ONS' preferred migration variant is underpinned by only 306,600 people per annum from 2030 onwards, and the high international variant based on 476,500 people per annum from 2030 onwards.
22. In the context of the average net international migration being recorded at an average of 610,000 people per annum since the end of COVID-19 restrictions, the preferred household projection and the high international migration variant are both considered more realistic than the low international migration variant.
23. It is also imperative to consider that these are baseline projections. They make no further adjustment for affordability, as was applied in the previous standard method and the current standard method. This would increase all these figures even further.

Summary

24. In summary this section has illustrated how the most up-to-date baseline demographic projections indicate that household growth in Rugby will exceed the 636 dpa housing requirement being proposed in the Draft Plan.
25. The preferred variant of the 2022-based household projections indicates an increase of approximately 1,500 homes over the Plan period based on a conservative estimate of international net migration to the country.
26. This increases to nearly 2,000 additional dwellings under the variant historically preferred by the ONS (five-year migration) and nearly 5,000 based on the high international migration variant which is underpinned by a level of net international migration which has been regularly exceeded recently and is therefore considered realistic.

Housing Requirement

27. On the evidence outlined above, there is a clear need to increase the housing requirement beyond the Standard Method to at least 721 dpa, albeit 1,000 dpa is realistic in the context of past delivery rates. Housing delivery in Rugby has averaged 965dpa since 2018/19,

despite the national slowdown experienced during the COVID-19 pandemic. In 2022/23 net completions, reached 1,349 dwellings.

Sustainability Appraisal

28. The Sustainability Appraisal fails to adequately test higher growth options in terms of housing. It has only tested higher growth scenarios aligned to three strategic options, and should have considered an alternative scenario that provided for higher growth dispersed to the main rural settlements.
29. In respect of Policy S2 Part B. Sources of Supply, the Plan fails to demonstrate a sufficient supply of sites to meet the housing requirement or specific deliverable sites for the first 5 years of the Plan period.
30. Policy S2 B. places over reliance on larger sites. Over 60% of the housing need to be met within the new Local Plan is to come from the three strategic housing allocations adopted through the current Local Plan (South West Rugby, Houlton and Eden Park). If for any reason these sites do not come forward at pace over the Plan period (particularly South West Rugby delivering over 300 dpa for three consecutive years and an average of over 200 dpa across the Plan period), the Plan will fail in so far as meeting housing need and delivering a five year supply on adoption.
31. Notwithstanding the housing trajectory provided, there is an absence of evidence to demonstrate the housing delivery rates on South West Rugby and Houlton will be achieved within the Plan period.
32. In respect of other sources of supply, it is noted that the housing trajectory relies on 850 dwellings from windfalls (50 dwellings per annum). The inclusion of a windfall allowance for each year of the Plan period is unsound given the likelihood of double counting with sites with planning permission also taken into account in the supply. The windfall allowance should therefore be reduced by 150 dwellings to remove the first three years of the plan period to avoid double counting.

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.

33. Policy S2 Part A. and the housing requirement should be amended to reflect an extended plan period to provide a minimum of 15 years, and to provide at least 721 dwellings per annum.

34. Policy S2 Part B. and the housing supply should be amended to increase the supply from allocations under Policy S6 to meet the amended housing requirement with a buffer of at least 10%.

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:

35. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

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.

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from

businesses addresses), but not names, will be redacted before representations are published.

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

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

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

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

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official use
only)

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

Rugby Borough Council Proposed
Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 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		Mrs
First Name		Sandra
Last Name		Ford
Job Title (where relevant)		Planning Director
Organisation (where relevant)	Warwickshire Property and Development Group	Marrons
Address Line 1		Bridgeway House
Line 2		Bridgeway
Line 3		Stratford-upon-Avon
Line 4		Warwickshire
Post Code		CV37 6YX
Telephone Number		
E-mail Address		Sandra.Ford@marrons.co.uk

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

Name or Organisation:

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

Paragraph	Strategic Priorities – Page 7	Policy		Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

1. Not sound.
2. The third strategic priority ‘overall pattern and scale of development and conservation’ is not consistent with national policy. The wording is not clearly written and is ambiguous as to what it means.

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.

3. The strategic priority should be re-written to make it clear what the strategic priority of the Local Plan is.

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:

4. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

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.

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>

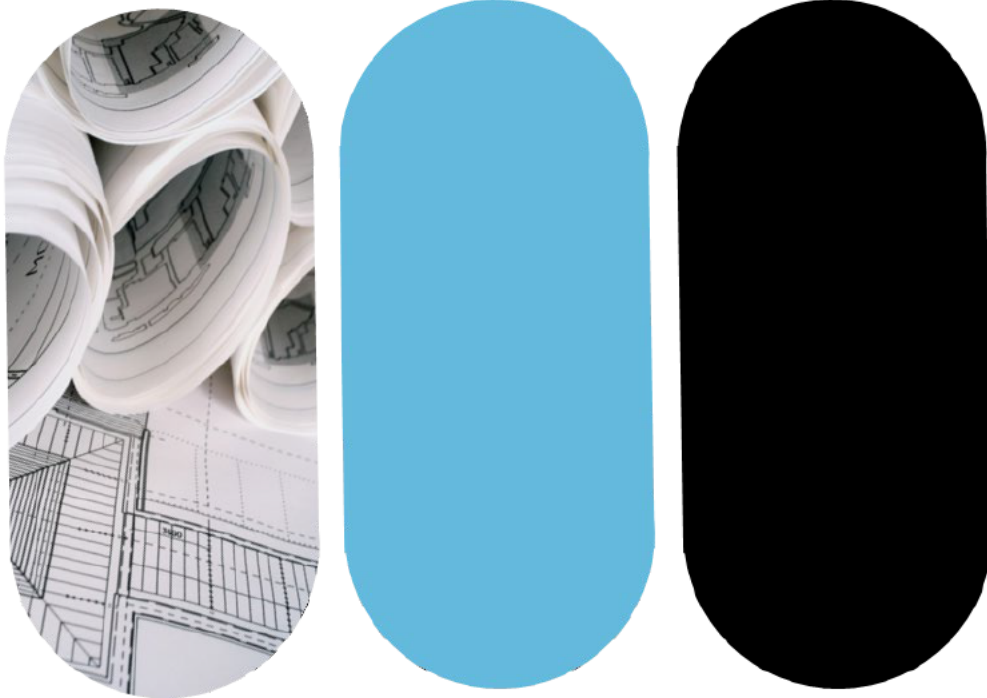
Warwickshire Property and Development Group

Homestead Farm (Site ID 90)

Rugby Local Plan

Proposed Submission Local Plan Consultation (Regulation 19)

March 2026



1. Introduction

1. The following representations are made in response to the Rugby Proposed Submission Plan Consultation (Regulation 19) on behalf of Warwickshire Property and Development Group in respect of their land Homestead Farm (Site ID 90).
2. These representations are made on behalf of Warwickshire County Council (WCC) as land owner by Warwickshire Property and Development Group (WPDG) which was launched by Warwickshire County Council to contribute positivity to the delivery of its Commercial Plan priorities through delivery of a range of commercial and mixed-use development and through delivering new affordable and market priced homes.

Objectives

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

Paragraph	Objectives – Page 6
Policy	
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

4. Not sound.

5. The Plan Objectives are not justified or consistent with national policy as they fail to include an objective related to meeting housing needs, particularly affordable housing. The Government's objective is to significantly boost the supply of homes and housing affordability is a key issue in the Borough as evidenced in the HEDNA. Whilst the provision of homes is a strategic priority, the failure to have meeting needs as an objective of the Plan means the Plan is not sound.

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.

6. An objective of the Plan should be to meet the housing needs of the Borough.

☐

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

☒

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

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

7. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

Strategic Priorities

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

Paragraph	Strategic Priorities – Page 7
Policy	
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

8. Not sound.

9. The third strategic priority 'overall pattern and scale of development and conservation' is not consistent with national policy. The wording is not clearly written and is ambiguous as to what it means.

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.

10. The strategic priority should be re-written to make it clear what the strategic priority of the Local Plan is.

☐

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

☒

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

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

11. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

2 Strategy for Homes

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

Paragraph	
Policy	S2
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

12. Not sound

13. The housing requirement and supply within Policy S2 is not positively prepared, justified, effective, or consistent with national policy having regard to the following evidence.

14. In respect of Policy S2 Part A. Housing Requirement, the Plan fails to identify an appropriate housing requirement for the following reasons:

Plan Period

15. The Plan period to 2042 will not look ahead over a minimum of 15 years from adoption. The LDS assumes adoption by June 2027. 15 years from June 2027 is June 2042.

Rugby undertakes its housing monitoring in April of each year, and its housing trajectory therefore only projects and plans for housing delivery until March 2042. There will not therefore be a 15 year plan period.

Local Housing Need

16. National planning practice guidance is clear that the Local Housing Need derived from the Standard Method may only be relied upon for a period of two years from the time the Local Plan is submitted for Examination. It would therefore be prudent for the Council to review the housing requirement calculated utilising the Local Housing Need derived from the Standard Method prior to Submission.

Unmet Housing Needs

17. The Council needs to ensure they have considered accommodating unmet housing needs arising from outside of the Borough to ensure compliance with the Duty to Cooperate and to ensure that the New Local Plan can meet the positively prepared soundness test set out in Paragraph 36 of the Framework.
18. The adopted Rugby Local Plan provides 2,800 dwellings to meet the unmet needs of Coventry until 2031. Whilst the emerging Coventry Local Plan Review is not envisaging declaring unmet needs for housing, this will need to be monitored prior to submission of the Plan and through the Examination.

Demographic Growth

19. The first Office for National Statistics (ONS) local authority household projections (2022-based) in over five years were published on 28th October 2025, based on the 2022-based Sub National Population Projections (SNPP, 24th June 2025).
20. As they are linked to the 2021 Census the projections are not affected by the overestimating issues identified for the 2014-based household projections which formed the baseline need of the 2023 NPPF's standard method.

21. In the context of the NPPF and emerging NPPF stating how the housing requirement could exceed standard method need, and these projections being the most recent, there is justification to consider them in respect of Rugby

2022-based ONS Household Projections – Rugby

22. The 2022-based household projections incorporate several variant projections, and we consider these below. It should be noted that ONS recommend use of the 'migration category variant' projections scenario. This is because the ONS explain that it better reflects international migration patterns.

23. The additional variant projections are as follows:

- a five-year migration variant (consistent with the national population projections principal projection)
- a 10-year migration variant
- a high international migration variant
- a projected household representative rates (HRR) variant, projected throughout
- a low international migration variant
- a zero net migration variant

24. Table 3.1 lists the projections for Rugby over the proposed Plan period.

Table 3.1: 2022 Household Projections for Rugby, 2025-2042

Variant Projection	2025 Households	2042 Households	Households 2025-2042 (per annum)	Dwellings 2025-2042 (per annum)
High international migration	50,004	65,107	15,103 (888)	15,556 (915)

Five-year migration	49,982	62,406	12,424 (731)	12,797 (753)
Migration variant	49,887	61,781	11,894 (700)	12,251 (721)
Ten-year migration	49,858	61,117	11,259 (662)	11,597 (682)
Low international migration	49,955	59,207	9,252 (544)	9,600 (561)
HRRs projected throughout	49,537	59,056	9,519 (560)	9,805 (577)

Source: ONS

25. ONS' preferred projection is highlighted yellow and projects 700 households per annum (hpa), 2025-2042. A vacancy rate of 3% in Rugby is applied to arrive at 721 dwellings per annum (dpa), 2025-2042. This would equate to 85 additional dpa, and 1,445 additional dwellings over the proposed Plan period.

26. However, the five-year migration trend scenario would lead to an additional 1,989 dwellings over the Plan period, and the high international migration scenario, 4,743 additional dwellings.

27. The 10-year migration scenario is lower than the ONS' preferred migration variant but would still require an uplift of 782 dwellings over the Plan period.

28. Only the low international migration variant, and the variant where household representative rates (an unlikely scenario) show a lower need than the 636 dpa proposed as the housing requirement in the Draft Plan.

29. The low international migration variant assumes positive net international migration of 108,500 people per annum across the country from the year ending 2030. This should be considered in the context of net international migration to the UK which has only ever been recorded at that number or below in three quarters since 2012.

All three quarters where the figure was lower included the COVID-19 Pandemic period when international travel was severely restricted.

30. Furthermore, since the end of the COVID-19 Pandemic net international migration has been a minimum of 204,000 people and a maximum of 944,000 people. The average has been 610,000 people.
31. Since 2012 the average has been approximately 370,000 people per annum on average.
32. The ONS' preferred migration variant is underpinned by only 306,600 people per annum from 2030 onwards, and the high international variant based on 476,500 people per annum from 2030 onwards.
33. In the context of the average net international migration being recorded at an average of 610,000 people per annum since the end of COVID-19 restrictions, the preferred household projection and the high international migration variant are both considered more realistic than the low international migration variant.
34. It is also imperative to consider that these are baseline projections. They make no further adjustment for affordability, as was applied in the previous standard method and the current standard method. This would increase all these figures even further.

Summary

35. In summary this section has illustrated how the most up-to-date baseline demographic projections indicate that household growth in Rugby will exceed the 636 dpa housing requirement being proposed in the Draft Plan.
36. The preferred variant of the 2022-based household projections indicates an increase of approximately 1,500 homes over the Plan period based on a conservative estimate of international net migration to the country.
37. This increases to nearly 2,000 additional dwellings under the variant historically preferred by the ONS (five-year migration) and nearly 5,000 based on the high

international migration variant which is underpinned by a level of net international migration which has been regularly exceeded recently and is therefore considered realistic.

Housing Requirement

38. On the evidence outlined above, there is a clear need to increase the housing requirement beyond the Standard Method to at least 721 dpa, albeit 1,000 dpa is realistic in the context of past delivery rates. Housing delivery in Rugby has averaged 965dpa since 2018/19, despite the national slowdown experienced during the COVID-19 pandemic. In 2022/23 net completions, reached 1,349 dwellings.

Sustainability Appraisal

39. The Sustainability Appraisal fails to adequately test higher growth options in terms of housing. It has only tested higher growth scenarios aligned to three strategic options, and should have considered an alternative scenario that provided for higher growth dispersed to the main rural settlements.
40. In respect of Policy S2 Part B. Sources of Supply, the Plan fails to demonstrate a sufficient supply of sites to meet the housing requirement or specific deliverable sites for the first 5 years of the Plan period.
41. Policy S2 B. places over reliance on larger sites. Over 60% of the housing need to be met within the new Local Plan is to come from the three strategic housing allocations adopted through the current Local Plan (South West Rugby, Houlton and Eden Park). If for any reason these sites do not come forward at pace over the Plan period (particularly South West Rugby delivering over 300 dpa for three consecutive years and an average of over 200 dpa across the Plan period), the Plan will fail in so far as meeting housing need and delivering a five year supply on adoption.
42. Notwithstanding the housing trajectory provided, there is an absence of evidence to demonstrate the housing delivery rates on South West Rugby and Houlton will be achieved within the Plan period.

43. In respect of other sources of supply, it is noted that the housing trajectory relies on 850 dwellings from windfalls (50 dwellings per annum). The inclusion of a windfall allowance for each year of the Plan period is unsound given the likelihood of double counting with sites with planning permission also taken into account in the supply. The windfall allowance should therefore be reduced by 150 dwellings to remove the first three years of the plan period to avoid double counting.

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.

44. Policy S2 Part A. and the housing requirement should be amended to reflect an extended plan period to provide a minimum of 15 years, and to provide at least 721 dwellings per annum.

45. Policy S2 Part B. and the housing supply should be amended to increase the supply from allocations under Policy S6 to meet the amended housing requirement with a buffer of at least 10%.

☐

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

☒

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

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

46. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

S6 Residential Allocations

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

Paragraph	
Policy	S6
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

47. Not sound.

Site 90 Homestead Farm, Dunchurch

48. The HELAA Stage 2 Site Options Assessment confirms that there are no technical constraints to which would prohibit the development of the site. The main reasons for not allocating the site relates to the amount of development already taking place within the area and the inclusion of the site within the newly introduced Areas of Separation Policy. These matters, alongside the benefits of the Site, are addressed below:

Delivering a sufficient supply of homes (Section 5 of the Framework)

49. The allocation of small and medium sized sites is directly supported by Paragraph 73 of the National Planning Policy Framework. The Framework recognises the importance of small and medium sized sites in helping meet the housing requirement, and the need to assist SME housebuilders.
50. Small and medium sized sites within urban areas, such as Homestead Farm, contribute towards creating sustainable communities and are inherently sustainable due to the promotion of walking and cycling and the existing services and facilities in close proximity. Furthermore, new development within urban areas helps contribute towards the vitality and viability of existing services and facilities by providing increased footfall and local spending, as per Paragraph 90(f) of the Framework.
51. The Site is a logical location for housing due to its context. Residential development surrounds the site to the east and west, and the South West Rugby allocation opposite, brings substantial highways improvements to Coventry Road, further lending this location to the development proposed.
52. As acknowledged in the Stage 2 Site assessment Report the Site is free from any physical or environmental constraints that would prevent development. The Site is not designated or recognised for its landscape or heritage significance, and development would continue the urban form and pattern of development seen along Coventry Road, without further extending Dunchurch into the countryside.
53. Rapid and frequent existing public transport options are available nearby, with bus routes to Rugby, Southam, Leamington Spa, and the surrounding towns and villages available within walking distance. Furthermore, the Homestead Link Road, to be delivered early in the Plan period, will bring further walking, cycling and other transport options to the surrounding area
54. Dunchurch is ranked as the most sustainable settlement in the Rural Sustainability Study and therefore is the most appropriate location in the Borough (outside of Rugby town) to locate development. This is a result of Dunchurch hosting multiple schools,

healthcare and sports facilities, alongside a number of retail, leisure, entertainment, and other services that can meet the daily needs of residents.

55. The Homestead Farm, Dunchurch was previously proposed and an allocation within the Preferred Options consultation version of the Plan, the site can deliver approximately 30 dwellings in a highly sustainable location, on a site that is free of known constraints. The concern that the development of the site, of an additional 30 dwellings would lead of overdevelopment of the settlement is therefore refuted.
56. In terms of the objection to the site being allocated as a result of now falling with the newly proposed Area of Separation Policy, this is dealt with in more detail in response to Policy EP4.

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.

57. Site 90 Homestead Farm, Dunchurch should be included as a residential allocation within the Local Plan.

☐

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

☒

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

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

58. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

EN4 Areas of Separation

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

Paragraph	
Policy	EN4
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

Overall Policy.

59. Within the Proposed submission version of the Plan a new policy is proposed, EN4 Areas of Separation. The purpose of this policy is to protect the identify and distinctiveness of settlements and prevent their coalescence. The National Planning Policy Framework 2024 (NPPF) at Paragraph 16 criterion c) advises that Plan-making should “be shaped by early, proportionate and effective engagement between plan-makers and communities, businesses”. To support the inclusion of the new policy, new studies have been commissioned which are available for review as part of the consultation.

60. It is considered that the late inclusion of this Policy, at the submission version of the Plan, does not allow for sufficient time or provide the opportunity to undertake

meaningful engagement with the Council and is therefore contrary to the advice set out in the NPPF.

61. The policy is not justified as it is not supported by proportionate evidence, which is clear and fails to provide a robust justification for the policy.
62. The policy is a criteria-based policy, setting out the criteria by which development will be assessed and considered acceptable.
63. The policy appears to be focused on avoiding coalescence and retain the separate identity of settlements; rather than protecting high quality landscapes in the urban fringe and provide access to the countryside. However, within the Areas of Separation Report, 2025, which it is understood to be the main technical evidence base to justify the new policy there is no reference or a list of criterion by which to assess the “identify and distinctiveness of settlements”. Only an assertion that the evaluation of settlement “primarily relies upon information drawn from conservation appraisals and parish or neighbourhood” (paragraph 5.6). As a result, it is considered that the approach adopted lacks clarity and transparency and does not provide a criterion for an independent assessment. This is a fundamental flaw within the evidence to justify the policy’s inclusion within the Plan and this therefore Not Sound.
64. There is a lack of definition of terms relating to the evidence base for the policy. Paragraph 5.7 of the Areas of Separation Report 2025, advises that land within an assessment area is deemed to make a stronger contribution to settlement identify and lists four criteria, however, there is no methodology to determine how “Strong contribution” is defined or indeed any information to say what less than a strong contribution means.
65. The same lack of definition relates to how “*important part*” of settlements have been defined, along with “*it features prominently in the views to and from the settlement*” and how prominent and positive contributions have been arrived at, without this information it is not possible to understand how this has been judged.

66. Concern is also raised over the criteria assessing the nature of arriving and departing to and from the settlement, it is not known where this is being assessed from, for example what types of routes would the receptor be passing along.
67. In addition, there is also a lack of definition in terms of the approaches taken for the physical and visual separation and the urban influences, with only a definition given for *stronger contribution*.
68. The methodology used to inform the policy is insufficient as it is inadequate and lacks clarity. The methodology does not demonstrate how the relative importance of the land parcels has been defined.
69. It is unclear as to what specialist technical input has been utilised in the preparation of the report, for example, heritage, conservation officer, landscape architect. The methodology section refers to a desk top based exercise being undertaken supplemented by planning officers have walked through and around the assessment area.
70. In summary the policy is Unsound as it is not justified for the following reasons.
- The published Methodology/Approach is deficient, lacking in the definition of terms, and their detail of terms.
 - The LPA's methodology is insufficiently explained and lack clarity for an independent assessment.
 - The use of the published Methodology/Approach in the 2025 seems to have been used to only support higher contribution land (in order to support their justification of the enforcement of the Area of Separation advocated by the LPA).
 - The Methodology lacks detail and appears to be poorly explained and is insufficiently robust.
 - There is a lack of defining the scope and purpose of the study.
 - Who undertook the assessment and field-based assessment, their qualifications and experience i.e., Planner, Masterplanner, Landscape Architects?
 - Time of year when the field-based assessment was undertaken?

71. As a result the policy and the evidence base used to support the policy is not justified as it fails to take into account reasonable alternatives that could have been used as opposed to proposing an Area of Separation Policy.

Site Specific comments on Homestead Farm Site (Site ID 90).

72. The inclusion of Land south of Coventry Road, Dunchurch within the Areas of Separation Policy is not justified or evidenced so is therefore Unsound.
73. Within the Areas of Separation report, November 2025, Chapter 7 sets out the context and justification for the Rugby – Dunchurch and Thurlaston Assessment. At paragraph 7.25 reference is made to Site 90, with the assertion made that development of the site would diminish the degree of physical separation between the western boundary of the village and the southern boundary of the town (inclusive of South West Rugby). Given the location of site 90 to the South West Rugby allocation, the boundary of the Areas of Separation is not logical and therefore refuted.
74. The site is enclosed by existing residential developments, which extend further west along Coventry Road, with vehicular access to its northern edge with residential along.
75. The additional development at the South West Rugby urban allocation to the north of the site will result in the extension of the urban area beyond the town edge of Rugby and extend south.
76. The site is a pocket site is situated within a pocket of land which is enclosed by residential development and within man-made features. The site is not prominent in views and is not experienced as part of the wider open countryside. As a result the site is not justified for inclusion within the Area of Separation policy.
77. As set out WPDG consider that Policy EP4 is not justified and should be deleted from the Plan. If the Policy is supported, then the removal of Site 90 from the EP4 designation is sought given there are no site-specific reasons for its inclusion within the Policy.

78. The accompanying landscape technical note, dated March 2026, produced by Blade provides a detailed analysis of the proposed policy and the evidence base published to support the proposed Area of Separation Policy which confirms that the evidence base relied upon is not robust and fails to justify the inclusion of the policy within the Plan.

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.

79. Policy EP4 should be deleted from the Plan and if the policy is retained, Site 90 should be removed from the EN4 Area of Separation Policy on the proposals map.

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

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

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

80. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

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		Mrs
First Name		Sandra
Last Name		Ford
Job Title (where relevant)		Planning Director
Organisation (where relevant)	Warwickshire Property and Development Group	Marrons
Address Line 1		Bridgeway House
Line 2		Bridgeway
Line 3		Stratford-upon-Avon
Line 4		Warwickshire
Post Code		CV37 6YX
Telephone Number		
E-mail Address		Sandra.Ford@marrons.co.uk

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

Name or Organisation:

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

Paragraph	Objectives – Page 6	Policy		Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

1. Not sound.
2. The Plan Objectives are not justified or consistent with national policy as they fail to include an objective related to meeting housing needs, particularly affordable housing. The Government's objective is to significantly boost the supply of homes and housing affordability is a key issue in the Borough as evidenced in the HEDNA. Whilst the provision of homes is a strategic priority, the failure to have meeting needs as an objective of the Plan means the Plan is not sound.

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.

3. An objective of the Plan should be to meet the housing needs of the Borough.

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:

4. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

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.

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		Mrs
First Name		Sandra
Last Name		Ford
Job Title (where relevant)		Planning Director
Organisation (where relevant)	Warwickshire Property and Development Group	Marrons
Address Line 1		Bridgeway House
Line 2		Bridgeway
Line 3		Stratford-upon-Avon
Line 4		Warwickshire
Post Code		CV37 6YX
Telephone Number		
E-mail Address		Sandra.Ford@marrons.co.uk

(where relevant)

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

Name or Organisation:

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

Paragraph		Policy	EN4	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

Overall Policy.

Within the Proposed submission version of the Plan a new policy is proposed, EN4 Areas of Separation. The purpose of this policy is to protect the identify and distinctiveness of settlements and prevent their coalescence. The National Planning Policy Framework 2024 (NPPF) at Paragraph 16 criterion c) advises that Plan-making should “be shaped by early, proportionate and effective engagement between plan-makers and communities, businesses”. To support the inclusion of the new policy, new studies have been commissioned which are available for review as part of the consultation.

It is considered that the late inclusion of this Policy, at the submission version of the Plan, does not allow for sufficient time or provide the opportunity to undertake meaningful engagement with the Council and is therefore contrary to the advice set out in the NPPF.

. The policy is not justified as it is not supported by proportionate evidence, which is clear and fails to provide a robust justification for the policy.

. The policy is a criteria-based policy, setting out the criteria by which development will be assessed and considered acceptable.

. The policy appears to be focused on avoiding coalescence and retain the separate identity of settlements; rather than protecting high quality landscapes in the urban fringe and provide access to the countryside. However, within the Areas of Separation Report, 2025, which it is understood to be the main technical evidence base to justify the new policy there is no reference or a list of criterion by which to assess the “identify and distinctiveness of settlements”. Only an assertion that the evaluation of settlement “primarily relies upon information drawn from conservation appraisals and parish or neighbourhood” (paragraph 5.6). As a result, it is considered that the approach adopted lacks clarity and transparency and does not provide a criterion for an independent assessment. This is a fundamental flaw within the evidence to justify the policy’s inclusion within the Plan and this therefore Not Sound.

. There is a lack of definition of terms relating to the evidence base for the policy. Paragraph 5.7 of the Areas of Separation Report 2025, advises that land within an assessment area is deemed to make a stronger contribution to settlement identify and lists four criteria, however, there is no methodology to determine how “Strong contribution” is defined or indeed any information to say what less than a strong contribution means.

. The same lack of definition relates to how “*important part*” of settlements have been defined, along with “*it features prominently in the views to and from the settlement*” and how prominent and positive contributions have been arrived at, without this information it is not possible to understand how this has been judged.

. Concern is also raised over the criteria assessing the nature of arriving and departing to and from the settlement, it is not known where this is being assessed from, for example what types of routes would the receptor be passing along.

In addition, there is also a lack of definition in terms of the approaches taken for the physical and visual separation and the urban influences, with only a definition given for *stronger contribution*.

The methodology used to inform the policy is insufficient as it is inadequate and lacks clarity. The methodology does not demonstrate how the relative importance of the land parcels has been defined.

It is unclear as to what specialist technical input has been utilised in the preparation of the report, for example, heritage, conservation officer, landscape architect. The methodology section refers to a desk top based exercise being undertaken supplemented by planning officers have walked through and around the assessment area.

In summary the policy is Unsound as it is not justified for the following reasons.

- The published Methodology/Approach is deficient, lacking in the definition of terms, and their detail of terms.
- The LPA's methodology is insufficiently explained and lack clarity for an independent assessment.
- The use of the published Methodology/Approach in the 2025 seems to have been used to only support higher contribution land (in order to support their justification of the enforcement of the Area of Separation advocated by the LPA).
- The Methodology lacks detail and appears to be poorly explained and is insufficiently robust.
- There is a lack of defining the scope and purpose of the study.
- Who undertook the assessment and field-based assessment, their qualifications and experience i.e., Planner, Masterplanner, Landscape Architects?
- Time of year when the field-based assessment was undertaken?

As a result the policy and the evidence base used to support the policy is not justified as it fails to take into account reasonable alternatives that could have been used as opposed to proposing an Area of Separation Policy.

Site Specific comments on Homestead Farm Site (Site ID 90).

The inclusion of Land south of Coventry Road, Dunchurch within the Areas of Separation Policy is not justified or evidenced so is therefore Unsound.

Within the Areas of Separation report, November 2025, Chapter 7 sets out the context and justification for the Rugby – Dunchurch and Thurlaston Assessment. At paragraph 7.25 reference is made to Site 90, with the assertion made that development of the site would diminish the degree of physical separation between the western boundary of the village and the southern boundary of the town (inclusive of South West Rugby). Given the location of site 90 to the South West Rugby allocation, the boundary of the Areas of Separation is not logical and therefore refuted.

The site is enclosed by existing residential developments, which extend further west along Coventry Road, with vehicular access to its northern edge with residential along.

The additional development at the South West Rugby urban allocation to the north of the site will result in the extension of the urban area beyond the town edge of Rugby and extend south.

The site is a pocket site is situated within a pocket of land which is enclosed by residential development and within man-made features. The site is not prominent in views and is not experienced as part of the wider open countryside. As a result the site is not justified for inclusion within the Area of Separation policy.

As set out WPDG consider that Policy EP4 is not justified and should be deleted from the Plan. If the Policy is supported, then the removal of Site 90 from the EP4 designation is sought given there are no site-specific reasons for its inclusion within the Policy.

The accompanying landscape technical note, dated March 2026, produced by Blade provides a detailed analysis of the proposed policy and the evidence base published to support the proposed Area of Separation Policy which confirms that the evidence

base relied upon is not robust and fails to justify the inclusion of the policy within the Plan.

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.

Policy EP4 should be deleted from the Plan and if the policy is retained, Site 90 should be removed from the EN4 Area of Separation Policy on the proposals map.

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:

To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

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.

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

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

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

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

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

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official use
only)

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

Rugby Borough Council Proposed
Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 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		Mrs
First Name		Sandra
Last Name		Ford
Job Title (where relevant)		Planning Director
Organisation (where relevant)	Warwickshire Property and Development Group	Marrons
Address Line 1		Bridgeway House
Line 2		Bridgeway
Line 3		Stratford-upon-Avon
Line 4		Warwickshire
Post Code		CV37 6YX
Telephone Number		
E-mail Address		Sandra.Ford@marrons.co.uk

(where relevant)

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

Name or Organisation:

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

Paragraph		Policy	S6	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

1. Not sound.

Site 90 Homestead Farm, Dunchurch

2. The HELAA Stage 2 Site Options Assessment confirms that there are no technical constraints to which would prohibit the development of the site. The main reasons for not allocating the site relates to the amount of development already taking place within the area and the inclusion of the site within the newly introduced Areas of Separation Policy. These matters, alongside the benefits of the Site, are addressed below:

Delivering a sufficient supply of homes (Section 5 of the Framework)

3. The allocation of small and medium sized sites is directly supported by Paragraph 73 of the National Planning Policy Framework. The Framework recognises the importance of small and medium sized sites in helping meet the housing requirement, and the need to assist SME housebuilders.
4. Small and medium sized sites within urban areas, such as Homestead Farm, contribute towards creating sustainable communities and are inherently sustainable due to the promotion of walking and cycling and the existing services and facilities in close proximity. Furthermore, new development within urban areas helps contribute towards the vitality and viability of existing services and facilities by providing increased footfall and local spending, as per Paragraph 90(f) of the Framework.
5. The Site is a logical location for housing due to its context. Residential development surrounds the site to the east and west, and the South West Rugby allocation opposite, brings substantial highways improvements to Coventry Road, further lending this location to the development proposed.
6. As acknowledged in the Stage 2 Site assessment Report the Site is free from any physical or environmental constraints that would prevent development. The Site is not designated or recognised for its landscape or heritage significance, and development would continue the urban form and pattern of development seen along Coventry Road, without further extending Dunchurch into the countryside.
7. Rapid and frequent existing public transport options are available nearby, with bus routes to Rugby, Southam, Leamington Spa, and the surrounding towns and villages available within walking distance. Furthermore, the Homestead Link Road, to be delivered early in the Plan period, will bring further walking, cycling and other transport options to the surrounding area
8. Dunchurch is ranked as the most sustainable settlement in the Rural Sustainability Study and therefore is the most appropriate location in the Borough (outside of Rugby town) to locate development. This is a result of Dunchurch hosting multiple schools, healthcare and sports facilities, alongside a number of retail, leisure, entertainment, and other services that can meet the daily needs of residents.

9. The Homestead Farm, Dunchurch was previously proposed and an allocation within the Preferred Options consultation version of the Plan, the site can deliver approximately 30 dwellings in a highly sustainable location, on a site that is free of known constraints. The concern that the development of the site, of an additional 30 dwellings would lead of overdevelopment of the settlement is therefore refuted.
10. In terms of the objection to the site being allocated as a result of now falling with the newly proposed Area of Separation Policy, this is dealt with in more detail in response to Policy EP4.

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.

11. Site 90 Homestead Farm, Dunchurch should be included as a residential allocation within the Local Plan.

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:

12. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

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.

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>