

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.*

Title

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

2. Agent's Details (if applicable)

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

4. Do you consider the Local Plan:

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

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

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

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

The concerns raised in our response to the Preferred Options consultation remain, the Councils evidence is not clear, not easy to understand and fails to allocate sufficient employment land within the Plan. The Plan fails to allocate the Barnwell Farm site as an employment allocation.

The Council has produced an Alignment Paper Addendum dated November 2025, which seeks to address the comments and concerns made during the previous consultation on the Preferred Options and the Alignment Paper produced as part the evidence base published at the same time as the Preferred Options consultation.

However, again the evidence contained within the updated Addendum is not clear with the evidence base used to justify the need for employment land within Rugby being largely out of date. Of note, the Addendum acknowledges this, commenting that this is not an issue. WPDG are of the opinion that this does matter and contend that the failure not to use up to date evidence results in a lack of employment needs being identified and a lack of employment sites allocated and therefore considers the Plan unsound.

Despite previous concerns raised over the lack of employment land proposed to be allocated the Council are still proposing a similar floorspace, however, with revisions made to the proposed allocations.

The Rugby Development Needs Topic Paper (December 2025) sets out how the employment need figure has been reached. However, it fails to address the additional needs that arises and which needs to be accommodated as a result of the shortfall identified in employment land at Coventry Gateway South, Opportunity Area 7, which falls within Coventry's administrative area, identified in the WMSESS. The shortfall identified was 90ha, however only 50ha is being proposed, it is considered that the full 90ha shortfall should be provided for. Of note, even with this identified shortfall the Council are still only proposing to allocate a similar level of employment land. Indeed, no land is allocated to address employment land shortfalls within the wider conurbation.

Alternative Site – Land at Blue Boar Farm, Thurlaston (Site ID 20)

Warwickshire Property and Development Group's site at Blue Boar Farm, Thurlaston (Site ID 20) is ideally positioned and aligned to continue the growth of the logistics, warehousing and distribution growth in the South West Rugby allocation and the confluence of the A45 / A4071.

Stage 2 Site Options Assessment December 2025.

Within the Stage 2 site options assessment undertaken by the Council, the Council advise that the site has multiple constraints, however, the landscape sensitivity of the site is deemed to be low, there are no heritage impact issues, surface water drainage constraints are low, foul water drainage assessed as medium, the ecology impacts

are considered to be medium, however, it is acknowledged that they could be mitigated. The assertion therefore that the site has multiple constraints is therefore refuted. The key constraints relate to the site falling within the Green Belt and making a strong contribution to Purpose A and the potential for relatively congested roads.

Green Belt Contribution Study Strategic Assessment October 2025

The purpose of the Green Belt Contribution Study is to provide a high-level strategic analysis of Green Belt and to assess whether areas are “Grey-Belt”, introduced in the NPPF in December 2024. In terms of site 20 the report concludes the following site serves the following purposes:

A. to check the unrestricted sprawl of large built-up area	Strong
B. to prevent in neighbouring towns merging	Moderate
C. to assist in safeguarding land from countryside	Moderate
D. to preserve the setting and special character of historic towns	Weak/No contribution
E. to assist in urban regeneration	Equal

On that basis as the site is considered to contribute strongly to purpose A the site is not considered to be “Grey-Belt”. This view is refuted by WPDG. As the report acknowledges, this is a high-level review and does not go down to the granular detail of site specifics.

As per the Green Belt Planning Practice Guidance (PPG), Sites that have physical features in reasonable proximity that could restrict and contain development and that are partially enclosed by existing development, should only be assessed as making a moderate contribution to Purpose A.

The A4071 provides a physical barrier to further development into the Green Belt, and the development parallel to the A45 / London Road partially encloses the Site, therefore the Site makes no more than a moderate contribution to Purpose A.

Given the site has been deemed to have moderate/weak no contribution to purposes B and D respectfully, with our assessment that purpose A should be moderate, then the site should be classed as Grey Belt as per the Framework and the PPG.

In accordance with Paragraph 148 of the Framework, the Council should consider the Site as a priority for development over other non-Grey Belt, Green Belt sites.

Highway Concerns

In terms of the highway issues raised, they appear to relate to the potential for congestion on the surrounding roads. The National Highways comments conclude the level of concern with the site is low.

The NPPF 2024, paragraph 115 advises that when assessing sites for allocation for development in Plans that

- a) Sustainable transport modes are prioritised taking account of the Vision for the site, the type of development and its location;
- d) Any significant impacts from the development on the transport network or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

Furthermore, paragraph 116 of the NPPF advises that;

“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.

The significant change here is the need to adopt a Vision Led approach, this does not appear to have done and is therefore considered to contrary to the NPPF.

The Site has unconstrained access to the A4071, with links into Rugby and the A45, which becomes the M45, providing efficient access for HGVs and other vehicles.

There is clear demand for employment development in this location, demonstrated by the pre-letting of units within South West Rugby. The Council should embrace this demand through the allocation of the necessary employment development.

The Site benefits from unconstrained access to the A4071 to the west, and can be developed in tandem with Land West of Symmetry Park (Site ID 77) and Land North of A45, Dunchurch (Site ID 58) to deliver a strategic level of employment development on the land between the A4071 and the Cawston Greenway. Upon completion of Symmetry Park, the Site will be immediately adjacent to built development, further improving the sustainability of the location.

The Site could deliver pedestrian and cyclist connections to the Cawston Greenway, providing active travel access to those working within the Site from Rugby, along an entirely traffic free route.

Deliverability of the site.

The Blue Boar Farm site is within single ownership, has a willing seller and there is developer and market demand for commercial space of varying size.

Response made to previous consultation for ease of reference.

Employment Need Evidence

Whilst Warwickshire Property Development Group do not disagree with the allocations made with the Preferred Options draft Local Plan, the Group raise into question the employment need evidence to ensure that Rugby Borough Council have accounted for **all** of the economic need of Borough and are making the appropriate amount of allocations to account for this need.

The Council's evidence regarding the amount of employment land required for the Plan period 2045 does not account for the latest completions data to 2023/24 as a Plan period which begins in 2024 should do. Rather, the West Midlands Strategic Employment Sites Study (WMSESS) only accounts to 2021/22. This issue is not resolved by the HEDNA-WMSESS Alignment Paper as this does not provide sufficient detail, and whilst Rugby has experience growth in the sector in recent years, the Alignment Paper comes to contrasting conclusions.

As a result, the Council has not applied the latest completions data in determining their future need, despite these completions most accurately reflecting the state of the modern logistics market.

The most recent Authority Monitoring Report (AMR), dated to 2023/24, outlines that Rugby has seen 200.8ha of B2 / B8 and mixed use completions. Extrapolating these completions over the 21-year Plan period would suggest a need of 522ha of industrial / mixed use employment land in Rugby.

522ha is clearly significantly higher than that proposed by the Council, which the Development Needs Topic Paper (DNTP) places at 284ha, of which only 81.5ha is accounted for in the adopted Local Plan. Furthermore, the DNTP also outlines that Coventry has an unmet need for 45ha of employment land which is not proposed to be met in this Local Plan.

Warwickshire Property and Development Group consider that the Council should revisit their evidence base in terms of employment need to ensure that the Plan can continue through examination as the consequence of under-estimating their employment need this severely could be dire.

Rugby's Advantageous Position

Rugby lies in an extremely advantageous position, at the confluence of the most prominent north-south connection in the UK, the M1 motorway, and significant east-west connections, namely the M6 and M45/A45.

As per Paragraph 86a of the Framework, the Council should positively and proactively encourage sustainable economic growth, with regard to the national industrial strategy, namely the report "Invest 2035: The UK's Modern Industrial Strategy". This strategy identifies "an enormous untapped potential outside the capital".

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.

The Barnwell Farm site is proposed as an employment allocation within the Local Plan, and is classed as a Grey Belt site.

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>

Warwickshire Property and Development Group

Blue Boar Farm, Site ID 20.

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 interest at Blue Boar Farm, Thurlaston. (SA Site Ref: 20)

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.

Policy S3

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

Paragraph	
Policy	S3
Policies Map	
Site ID	20

Do you consider the Local Plan:

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

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.

Policy S3: Strategy for Employment Land.

3. The policy is not justified as it is not supported by proportionate evidence and fails to provide a robust justification for the policy.
4. The concerns raised in our response to the Preferred Options consultation remain, the Councils evidence is not clear, not easy to understand and fails to allocate sufficient employment land within the Plan. The Plan fails to allocate the Barnwell Farm site as an employment allocation.
5. The Council has produced an Alignment Paper Addendum dated November 2025, which seeks to address the comments and concerns made during the previous

consultation on the Preferred Options and the Alignment Paper produced as part the evidence base published at the same time as the Preferred Options consultation.

6. However, again the evidence contained within the updated Addendum is not clear with the evidence base used to justify the need for employment land within Rugby being largely out of date. Of note, the Addendum acknowledges this, commenting that this is not an issue. WPDG are of the opinion that this does matter and contend that the failure not to use up to date evidence results in a lack of employment needs being identified and a lack of employment sites allocated and therefore considers the Plan unsound.
7. Despite previous concerns raised over the lack of employment land proposed to be allocated the Council are still proposing a similar floorspace, however, with revisions made to the proposed allocations.
8. The Rugby Development Needs Topic Paper (December 2025) sets out how the employment need figure has been reached. However, it fails to address the additional needs that arises and which needs to be accommodated as a result of the shortfall identified in employment land at Coventry Gateway South, Opportunity Area 7, which falls within Coventry’s administrative area, identified in the WMSESS. The shortfall identified was 90ha, however only 50ha is being proposed, it is considered that the full 90ha shortfall should be provided for. Of note, even with this identified shortfall the Council are still only proposing to allocate a similar level of employment land. Indeed, no land is allocated to address employment land shortfalls within the wider conurbation.

Alternative Site – Land at Blue Boar Farm, Thurlaston (Site ID 20)

9. Warwickshire Property and Development Group’s site at Blue Boar Farm, Thurlaston (Site ID 20) is ideally positioned and aligned to continue the growth of the logistics, warehousing and distribution growth in the South West Rugby allocation and the confluence of the A45 / A4071.

Stage 2 Site Options Assessment December 2025.

10. Within the Stage 2 site options assessment undertaken by the Council, the Council advise that the site has multiple constraints, however, the landscape sensitivity of the site is deemed to be low, there are no heritage impact issues, surface water drainage constraints are low, foul water drainage assessed as medium, the ecology impacts are considered to be medium, however, it is acknowledged that they could be mitigated. The assertion therefore that the site has multiple constraints is therefore refuted. The key constraints relate to the site falling with the Green Belt and making a strong contribution to Purpose A and the potential for relatively congested roads.

Green Belt Contribution Study Strategic Assessment October 2025

11. The purpose of the Green Belt Contribution Study is to provide a high-level strategic analysis of Green Belt and to assess whether areas are “Grey-Belt”, introduced in the NPPF in December 2024. In terms of site 20 the report concludes the following site serves the following purposes:

A. to check the unrestricted sprawl of large built-up area	Strong
B. to prevent in neighbouring towns merging	Moderate
C. to assist in safeguarding land from countryside	Moderate
D. to preserve the setting and special character of historic towns	Weak/No contribution
E. to assist in urban regeneration	Equal

12. On that basis as the site is considered to contribute strongly to purpose A the site is not considered to be “Grey-Belt”. This view is refuted by WPDG. As the report acknowledges, this is a high-level review and does not go down to the granular detail of site specifics.

13. As per the Green Belt Planning Practice Guidance (PPG), Sites that have physical features in reasonable proximity that could restrict and contain development and that are partially enclosed by existing development, should only be assessed as making a moderate contribution to Purpose A.

14. The A4071 provides a physical barrier to further development into the Green Belt, and the development parallel to the A45 / London Road partially encloses the Site, therefore the Site makes no more than a moderate contribution to Purpose A.
15. Given the site has been deemed to have moderate/weak no contribution to purposes B and D respectively, with our assessment that purpose A should be moderate, then the site should be classed as Grey Belt as per the Framework and the PPG.
16. In accordance with Paragraph 148 of the Framework, the Council should consider the Site as a priority for development over other non-Grey Belt, Green Belt sites.

Highway Concerns

17. In terms of the highway issues raised, they appear to relate to the potential for congestion on the surrounding roads. The National Highways comments conclude the level of concern with the site is low.
18. The NPPF 2024, paragraph 115 advises that when assessing sites for allocation for development in Plans that
- a) Sustainable transport modes are prioritised taking account of the Vision for the site, the type of development and its location;
 - d) Any significant impacts from the development on the transport network or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.
19. Furthermore, paragraph 116 of the NPPF advises that;
- “Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.*
20. The significant change here is the need to adopt a Vision Led approach, this does not appear to have done and is therefore considered to contrary to the NPPF.

21. The Site has unconstrained access to the A4071, with links into Rugby and the A45, which becomes the M45, providing efficient access for HGVs and other vehicles. There is clear demand for employment development in this location, demonstrated by the pre-letting of units within South West Rugby. The Council should embrace this demand through the allocation of the necessary employment development.
22. The Site benefits from unconstrained access to the A4071 to the west, and can be developed in tandem with Land West of Symmetry Park (Site ID 77) and Land North of A45, Dunchurch (Site ID 58) to deliver a strategic level of employment development on the land between the A4071 and the Cawston Greenway. Upon completion of Symmetry Park, the Site will be immediately adjacent to built development, further improving the sustainability of the location.
23. The Site could deliver pedestrian and cyclist connections to the Cawston Greenway, providing active travel access to those working within the Site from Rugby, along an entirely traffic free route.

Deliverability of the site.

24. The Blue Boar Farm site is within single ownership, has a willing seller and there is developer and market demand for commercial space of varying size.

Response made to previous consultation for ease of reference.

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WMSESS Alignment Paper as this does not provide sufficient detail, and whilst Rugby has experience growth in the sector in recent years, the Alignment Paper comes to contrasting conclusions.

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As per Paragraph 86a of the Framework, the Council should positively and proactively encourage sustainable economic growth, with regard to the national industrial strategy, namely the report "Invest 2035: The UK's Modern Industrial Strategy". This strategy identifies "an enormous untapped potential outside the capital".

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.

25. The Barnwell Farm site is proposed as an employment allocation within the Local Plan, and is classed as a Grey Belt site.

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:

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

