RBC 14 Comments — Hillmorton Voice (223)

We welcome the updated employment land memorandum. It raises important questions about the scale, location and justification of employment allocations, and their relationship with housing provision.

1. Implications of the identified surplus

Paragraph 3.4 identifies employment land supply exceeding assessed need across Coventry and Warwickshire by 7–22% to 2045. We recognise that this does not establish that individual Rugby allocations are unnecessary. Nevertheless, we ask whether this updated position warrants a targeted review of Rugby's employment allocations and the assumptions underpinning them.

2. Suitability of land for alternative uses

Where that review identifies employment land which is no longer necessary or appropriately located, the Council should assess whether it could sustainably accommodate housing or mixed development. Such opportunities could potentially reduce pressure for housing development around the western villages and elsewhere.

This should involve assessment of access, infrastructure, environmental constraints and deliverability, rather than an assumption that employment land is automatically suitable for housing.

3. Justification for the level of provision

Paragraph 2.6 confirms that five-year flexibility margins are already incorporated into the needs calculations. Paragraph 4.3 also confirms that Rugby's approach uses the upper end of the strategic need range.

We ask the Inspectors to seek a clear explanation of why this combination remains appropriate in light of the updated supply position. The Council should distinguish underlying need, flexibility allowances, existing commitments and additional allocations, demonstrating that overlapping allowances or requirements have not been counted twice.

4. Consistent treatment of cross-boundary relationships

Paragraph 6.4 acknowledges that employment markets cross administrative boundaries and that past development patterns reflect land availability and previous planning decisions.

We ask that this principle also inform assessment of the Rugby–West Northamptonshire relationship, particularly the connected area comprising Hillmorton, Houlton and DiRFT.

Different regional or market-area classifications should not prevent the authorities from examining actual commuting patterns, labour supply, housing relationships and cumulative transport impacts. Equally, any conclusion that provision on one side of the boundary can—or cannot—meet needs on the other should be supported by evidence.

5. Action requested

We respectfully ask the Inspectors to request an urgent, proportionate evidence note from Rugby Borough Council, prepared with West Northamptonshire Council and other relevant authorities, which:

- reconciles employment need and supply using consistent dates and definitions;
- explains the upper-range assumptions and flexibility margins;
- identifies any implications for individual Rugby allocations and suitable alternative uses; and
- demonstrates how the Houlton–DiRFT relationship has been assessed without omissions or double counting.

We ask that this evidence be published with an opportunity for comment before conclusions are reached on the employment strategy.

Our objective is to help secure an appropriately evidenced and deliverable plan, with development directed to suitable locations and avoidable pressure on communities and valued landscapes reduced.

Regards,

Alun Williams
For Hillmorton Voice