

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

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

Rugby Borough Council Proposed
Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026
By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in
the subject line, OR by post to:** Development Strategy, Town Hall, Evreux Way,
Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each
representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Miss"/>	<input type="text"/>
First Name	<input type="text" value="Lindsay"/>	<input type="text"/>
Last Name	<input type="text" value="Foster"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Ansty Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<input type="text"/>
Line 3	<input type="text" value=""/>	<input type="text"/>
Line 4	<input type="text" value=""/>	<input type="text"/>
Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value=""/>	<input type="text"/>

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

Name or Organisation:

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	121				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" 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 checked="" type="checkbox"/>	No	<input type="checkbox"/>

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

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unacceptable proposal contained in the draft Rugby Local Plan concerning the proposed massive employment allocation at 'Land at Walsgrave Hill (site ID 121)', part of which is in the parish, and which will have major mainly negative effects on the local area.

Whilst the proposed allocation is not without some benefits such as facilitating the provision of employment land, these would not outweigh, by a wide margin, the harm it would cause.

It is not proportionate or needed nor does it represent sustainable development or constitute exceptional circumstances required to justify the release of a significant amount of land in the Green Belt for development. It would also bring harm to biodiversity, infrastructure, landscape and heritage. As the National Planning Policy Framework (NPPF) states at paragraph 7 "The purpose of the planning system is to contribute to the achievement of sustainable development".

The site is not in a sustainable location. It is essentially a greenfield site in the countryside.

By their nature, such sites in the countryside are generally less sustainable, especially as they are not well served by existing physical and social infrastructure and development in such locations often exacerbates car reliance – as is the case here.

Further, the scale of development proposed individually and cumulatively in and around the parish is clearly not commensurate with the services, infrastructure and facilities that can be found in it.

The parish is devoid of services and facilities consisting of a pub (The Rose and Castle), and a social club (Ansty Social Club). Something that the Borough Council recognise by identifying Ansty as one of the least sustainable settlements in the parish as reflected in its position in the hierarchy settlement. There are more fairer, sustainable and suitable choices.

The proposal does not offer a genuine choice of travel modes and encourage the use of sustainable modes of travel

A main bus service (the 84) that serves the proposal provides a very limited day time service about every 120/150 minutes, with no services in the evening or on a Sunday. The closest bus stop to the site is about 500 metres away and would require walking along often narrow and unsafe footpaths. Cycle provision to the site is equally poor. The closest train station (Coventry) is many miles away.

This means that users of the proposed development will have an overwhelming need to travel by car.

While it is accepted that the proposal includes some measures (often lacking details and substance) to improve its accessibility and sustainability, such as the provision of footpaths and dedicated cycleways as well as a vague proposal for a very light railway. It is also recognised that these measures may result in fewer trips by car. These are insufficient by a wide margin to make it genuinely sustainable. Indeed, it is clear that the choice of location and some mix of proposed employment uses are principally aimed at car and other vehicle uses.

The proposal does not offer a genuine choice of travel mode for all users and as such is in conflict with national and local planning policies that seek to ensure that development, particularly major, is in locations that are or can be made accessible by sustainable modes of transport. As NPPF states at paragraph 110 "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes".

The negative effects of the proposal on highway safety

Closely related to the above, we are very concerned about the negative impact the increased traffic movements (overwhelmingly by car) that the developments will generate in the parish and the wider local area, especially along the B4029 and its feeder roads as well as the A46.

These roads are already very busy and congestion is common, especially at peak times and often used as 'rat runs'.

The proposed development will only make this unacceptable situation worse to the detriment of highway and pedestrian safety.

Again, while the proposal includes the provision of highway improvements, these are considered grossly inadequate to meet the anticipated local demand of the development.

There has been insufficient regard to the National Planning Policy Framework (NPPF), emphasis on the need to protect of the Green Belt

We note that a large area of land is proposed to be removed from the Green Belt to facilitate the development of the site. We contend that the approach taken, as articulated in the emerging Local Plan, is flawed and wrong. There

has been insufficient regard to the requirements contained in the NPPF especially those contained in paragraphs:

- 142, which “emphasises the great importance that the Government attaches to Green Belt.”
- 145, that requires “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans”.
- 147, which requires, “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development” and
- 149f which states “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

The proposal fails, by a wide margin, to meet these and several other relevant national planning requirements, including those contained in the Green Belt Planning Practice Guidance. In particular, we strongly contend that all other reasonable options for meeting the identified need for development in the borough have not been fully examined as advocated in the NPPF and supporting national planning policies and statements. As previously stated, we strongly contend that there are other better options. This includes greater utilisation and prioritisation of land in and around Rugby and the other main centres.

Also, maximising the use of suitable brownfield sites and underutilised land. An approach that is strongly supported by national planning policies as illustrated by: section (a) of paragraph 147 of the NPPF that requires that before proposing changes to Green Belt boundaries the local authority (in this instance, Rugby Borough Council) must be able to demonstrate that it makes “as much use as possible of suitable brownfield sites and underutilised land”. Furthermore paragraph 124 of the NPPF, requires that “strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or ‘brownfield land’”. We strongly consider that the Rugby Council has not made as much use as possible of brownfield sites and previously developed land to accommodate future development needs. There are many previously developed and brownfield sites we consider that have been overlooked. This includes the availability of previously developed and grey belt sites in the Green Belt. This is a major concern especially as it is a planning requirement as paragraph 148 of the NPPF states “Where it is necessary to release Green Belt Land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations”.

Furthermore, it is evident that the focus of the approach (despite contrary statements in the draft plan and supporting documents) is on the identification of a few large-scale sites to meet employment development needs. This preference is flawed, especially as it overlooks and generally has insufficient regard to the identification of smaller sites, including in the built-up areas, which often could be developed more quickly and sustainably than larger ones.

We strongly consider that much, if not all, of any employment growth required, even based on Rugby Council's flawed methodology), can be accommodated on either brownfield sites and previously developed land in the borough or by greater optimisation of smaller sites.

This would, we consider, negate the need to develop on greenfield sites in the Green Belt, including this site, which it is proposed to be removed from the Green Belt.

Finally, we would contend that the resulting green boundary is weak and not strong and defensible, as advocated by the NPPF. The existing boundary is much more durable using strong, clearly defined physical features such as the A46.

The sites continue to perform an important Green Belt role

We consider that the site to be 'high performing' in Green Belt terms. It has, and continues to perform, an important Green Belt role, particularly in checking the unrestricted sprawl of Coventry and other built-up areas, safeguarding the countryside and focusing development on brownfield sites and encouraging the recycling of derelict and other urban land. Indeed, it is considered that it continues to fulfil all five of the purposes for Green Belt as set out in the Local Plan and the NPPF.

Had a clearer and more robust process been undertaken, we are convinced that it would have concluded that its release from the Green Belt is not justified. Especially having regard to national rules that require that Green Belt land is released only in very exceptional circumstances and in those places that perform the weakest Green Belt function and are in the most sustainable locations.

Harm to Biodiversity Assets

Paragraph 180 of the NPPF requires planning decisions to minimise impacts on biodiversity and provide net gains where possible.

That the site is of biodiversity value is not disputed. Its relatively open and undeveloped nature and the presence of hedgerows (some historic), trees and other environmental features provide important and much-valued habitats for a variety of wildlife and wildflowers. Indeed, it supports a variety of species and habitats some protected, including priority habitats and a nearby Site of Special Scientific Interest.

Many of these habitats and features will be unacceptably adversely affected by the proposal.

Adverse effects of the proposal on landscape character, the appearance of the site and the visual amenity of the surrounding area

The proposal would have a significant harmful effect on the landscape character and appearance of the area. That the site is in the countryside is not disputed by any parties.

It is a cherished and valued features in the local landscape. This is for a variety of reasons. The wildlife and habitat its supports, the opportunities it

presents for informal and formal recreation, its relatively attractive topography and the views and panoramas they offer. It also contains trees and other important natural and manmade assets that contribute to its important open character.

The proposal, in developing it for major employment purposes would inevitably change the character of the sites. It would have a harmful urbanising effect. It is accepted that some of the green areas would be retained but instead of forming part of a primarily rural landscape, it would lie within an urban context being surrounded by built development.

As such, the proposed development with its introduction of employment related buildings, substantial parking etc, would result in significant and permanent harm to the landscape, character and appearance.

It would appear as a highly visible and undesirable development that encroaches into prominent, open and attractive countryside and is unrelated to, and detracts from, this predominately rural and open landscape.

Unacceptable impact on Heritage Assets

We are also deeply concerned about the impact that the proposal will have on designated and non-designated heritage assets.

In particular, Coombe Abbey, which is a scheduled Grade 1 Listed Building reflecting its national importance as well as a registered Park and Garden.

Though outside of the parish, it is a much loved and cherished asset. We consider that the proposal, even taking into account the proposed mitigation measures, would cause irreversible and substantial harm to its setting and is, therefore, contrary to national and local planning policies that seek to conserve important and irreplaceable heritage assets.

Finally, we are also mindful that the appropriateness of the site was considered as part of the development of the Rugby Local Plan (2019) which found multiple reasons for its unsuitability and unsustainability for development, and as a consequence, concluded that it was not suitable for development – reasons which we considers remain true and relevant now as then.

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

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For these are compelling reasons the allocation should be removed from the Local Plan.

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

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

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

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To represent views of residents

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Part A

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**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)

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First Name	<input type="text" value="Lindsay"/>	<input type="text"/>
Last Name	<input type="text" value="Foster"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Ansty Parish Council"/>	<input type="text"/>
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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S3	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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The emerging Local Plan sets out a strategy for employment land. It identifies, at Policy S3, a need for an additional approximately 300 hectares of new employment land between 2025-2042 and sets a series of proposed allocations to be delivered to achieve this. This includes the huge proposed new allocation at Crowner Fields Farm (site 95) at 275,000 sq. metres as well as Land at Walsgrave Hill (site 121) at 290,000 sq. metres, which falls partly in the parish. These are in addition, to the existing massive, and not yet fully built-out, allocation at Prospero Park (26,663 sq. metres) in the parish. It should also be noted that Ansty Park North (site 14) while outside the parish is still within the vicinity.

Before we move into detail onto the proposed employment allocation at Walsgrave Hill, can we say that the process and methodology used in arriving at the overall employment land figure for the borough and how it has sought it has sought to distribute the resultant need, is fundamentally flawed and unsound, with the proposed huge employment allocation at Walsgrave Hill a great example of this. In particular, as:

- The justification, as required by national planning rules covering the preparation of local plans, for how the total (quantum) employment

need figure for the borough (which we consider to be too high) and how the sites were selected is inadequate.

- We also consider that the reasonable alternative options have not been fully explored (as again required by national planning rules covering the preparation of local plans).
- The focus of the approach is on the identification of a few large-scale sites to meet employment needs. This preference is flawed, especially as it overlooks, and generally has insufficient regard to, the identification of smaller sites, which often could be developed more quickly and sustainably than larger ones.
- It does not make sufficient provision for employment growth in and around Rugby the main town in the borough and the other defined Main Settlements, where a significant proportion of the population and key services and facilities are located, and which Policy S1 states “Rugby town (as shown on the policies map) will be the main focus for new homes and employment. “(which it is evidently not!). Also, in the other defined Main Rural Settlements.

The approach is not fair or proportionate, nor does it represent sustainable development.

It would result in the Ansty parish having the highest amount of land, and by a wide margin, of new land allocated for employment. At an estimated 400,000 square metres, Crowner Fields Farm and Home Farm, Hinckley Road, Ansty (site ID 95) and that part of Land at Walsgrave Hill (site ID 121), part of which is in the parish represents over a third of the new land proposed to be allocated for employment land for the whole of the borough. It should be stressed that the population of the parish is less than 1% of the total population of the Borough. This is clearly not proportionate nor fair. Indeed, it should be noted that these figures exclude employment sites in and around the parish that already have been allocated or have planning permission.

Again, it should be emphasised that the parish is not opposed to new employment and other forms of development – we are not Nimby’s! It is considered that the parish has already made its proportional and sustainable contribution to meeting the borough’s employment and other needs. There are already concerns about the adverse individual and cumulative impact these developments will have on the character and infrastructure in the parish. The proposal is too much. They are out of scale and disproportionate with the parish and wider local area.

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

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Removal of some of the proposed employment allocation around Ansty

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

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

Represent views of residents of Ansty

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

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Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S1	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

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The Local Plan sets out the spatial distribution of development within the borough, and in doing so at Policy GP2 identifies five tiers of settlement – Rugby Town, Main Rural Settlements, Rural Villages, Countryside and Green Belt. It states in the support text that ‘Rural Villages’, which includes the defined village of Ansty “will not play a role in helping to deliver Rugby borough’s strategic growth” (paragraph 3.12) in part as they are recognised as not be sustainable or suitable locations for developments, especially major, “limiting new development to within existing settlement boundaries” (paragraph 3.12). Outside the defined settlements and villages, the policy gives great protection to their open character stating “Countryside locations are those which are not defined by a settlement boundary and are therefore generally unsuitable for development; in these locations inappropriate development will be resisted” (paragraph 3.14).

Policy S1 of the emerging Local Plan deals with the proposed spatial strategy for the borough. Similar to the approved local plan, which it is proposed it should replace, it sets out a spatial distribution of development within the borough, stating that it “seeks to direct development to those locations with services and facilities”. It identifies several defined ‘rural settlements’, which includes the village of Ansty, as having a limited role for development. The area outside the defined settlements, is viewed as countryside in the emerging Local Plan and where inappropriate development will be restricted.

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

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While it is recognised that the supporting text at paragraph 1.18 to Policy S1 makes reference to “It should be noted that the strategic employment allocations planned alongside Ansty Park and at Crouner Fields Farm/Home Farm, Ansty are at the edge of the Coventry urban area. These allocations effectively sit outside of the borough’s settlement hierarchy”. This unjustified and flawed statement almost appears as an afterthought and does not address nor attempt to justify that proposed employment allocation at Land at Walsgrave Hill is fundamentally at odds with the existing and emerging spatial strategy and settlement hierarchy that new strategic employment development should be sustainably and suitable located, which clearly it is not.

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To represent the views of the residents in the village of Ansty

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