

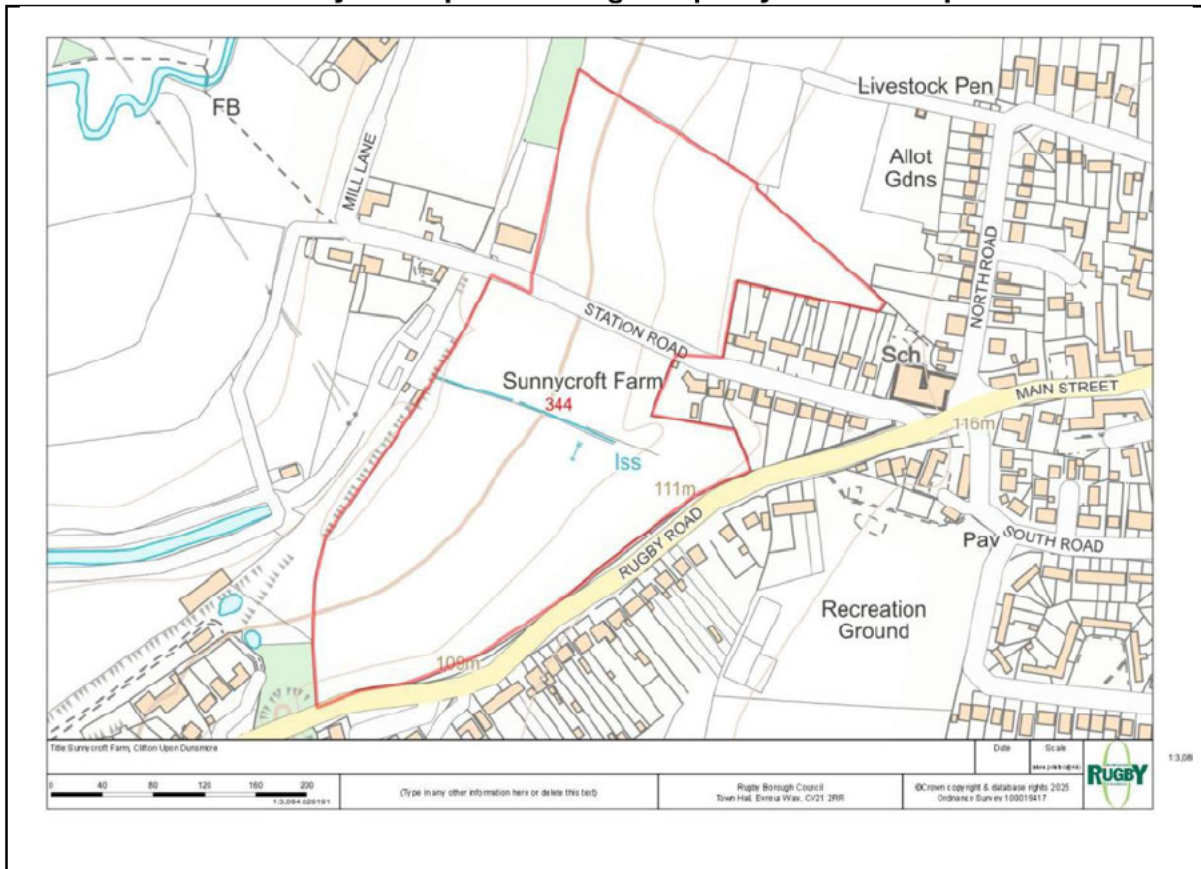
Archdiocese of Birmingham - Land off Station Road, Clifton-upon-Dunsmore



Site reference: 344

Sunnycroft Farm, Clifton upon Dunsmore

Conclusion: Not currently developable - changes to policy would be required



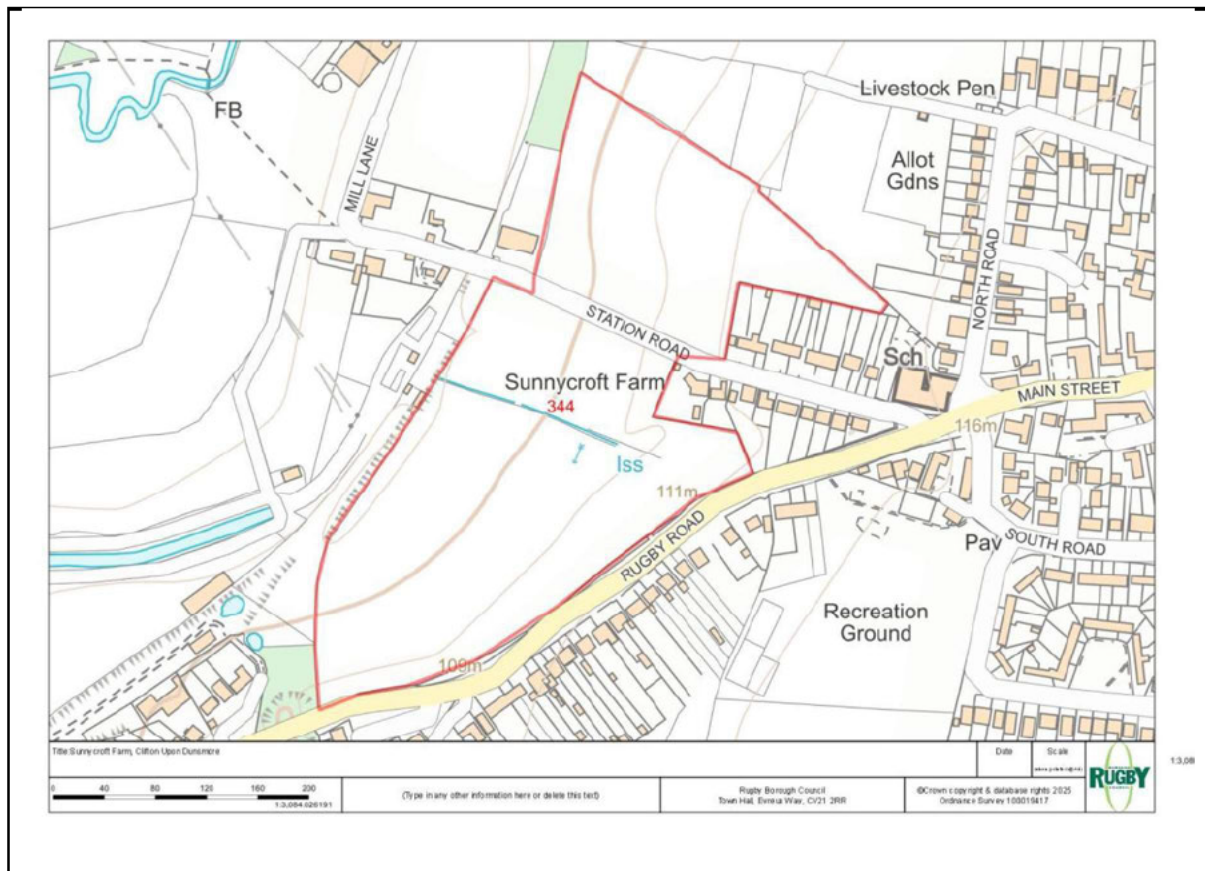
Basic

| | | | |
|-----------------------------------|-----------------------|----------------------------------|--------------------------------|
| Parish | Clifton-upon-Dunsmore | Ward | Clifton, Newton and Churchover |
| Current use | Agricultural | Gross site area | 8.94 |
| Net site area | 4.45 | Proposed use | Residential |
| Potential yield (employment, sqm) | | Potential yield (residential) | 120-150 |
| Green Belt/LGS | No | Agricultural Land Classification | Grade 3 |

Conclusions

| | |
|--------------------------------------|--|
| Available | Yes |
| Achievable | Yes |
| Suitable | Potentially |
| Suitability commentary | Western boundary of the site is at high risk of surface water flooding. Clifton Disused Railway Wildlife Site runs along site boundary, and the site lies within the outer Impact Risk Zone of the Cave's Inn Pits SSSI. Proximity to Clifton Conservation area and multiple designated heritage assets. Sloping site between Clifton upon Dunsmore and Rugby raises landscape and coalescence concerns. |
| Discounted? | FALSE |
| Justification for discounting | |

Site 344: Sunnycroft Farm, Clifton upon Dunsmore



Ward: Clifton, Newton and Churchover

Parish: Clifton-upon-Dunsmore

Proposed use: Residential

Potential yield (employment, sqm):

Potential yield (residential): 120-150 dwellings

| Topic area | Evaluation summary |
|------------|---|
| Transport | <p>The site is accessed from Station Road and Rugby Road.</p> <p>The nearest bus stop is located on the southern site boundary.</p> <p>The site has an average connectivity score of 51 and a maximum score of 56, placing it within band A relative to the borough as a whole.</p> <p>The site was not included in the SLR transport and accessibility assessment.</p> |
| Ecology | <p>Clifton Disused Railway Local Wildlife Site runs alongside site boundary. The site lies within the outer Impact Risk Zone of the Cave's Inn Pits SSSI, although the proposed development does not necessarily require consultation with Natural England on this.</p> |
| Landscape | <p>The overall landscape sensitivity of the site is Medium.</p> <p>The site comprises three medium-sized arable fields with low, unmanaged hedgerows and trees, creating an open character with long distance views across the surrounding valley landscape. The</p> |

| | |
|------------------------|---|
| | <p>site slopes northwards towards the valley between Clifton-upon-Dunsmore and Newton and is bordered by the 'Clifton Disused Railway' and 'Oxford Canal' pLWSs. Residential development along Rugby Road and nearby settlements introduce visual and auditory intrusion, whilst the northern section retains greater tranquillity and rural character. There is some intervisibility with the Clifton-upon-Dunsmore Conservation Area, as well as glimpsed views from nearby walking routes along the canal and disused railway.</p> <p>Development should be sensitively designed to complement the Clifton-upon-Dunsmore Conservation Area, and to integrate the contrasting 1970s residential properties to the south within the historical setting. Native vegetation planting would need to be increased towards the north of the site to soften views from the valley into the site. Development would most appropriately be located to the south, adjacent to Rugby Road.</p> |
| Heritage | There are no designated heritage assets within 50m. The site is within 100m of the Clifton Conservation Area which contains multiple designated heritage assets, but existing development provides some separation. |
| Other constraints | The site is not within the Green Belt. Western boundary of the site is at high risk of surface water flooding requiring suitable mitigation. No data was obtained relating to constraints for foul water drainage or surface water drainage. The site is within a proposed separation area between Clifton upon Dunsmore and Rugby. |
| Opportunities/benefits | Residential |

Outcome of further assessment: Not progressed

Reasoning: The site is adjacent to existing settlement of Clifton and benefits from reasonable connectivity.

The site also forms part of a proposed area of separation in the draft plan given its important role in maintaining separation between Clifton Upon Dunsmore and Rugby. Clifton-upon-Dunsmore is a nucleated hilltop village and the development of the site would detract from that character by developing the valley slopes between the village and the valley of the Warwickshire Avon.

There are potential heritage constraints due to proximity to conservation area and designated heritage assets within 100m of the site. There are medium landscape constraints, making it one of the more sensitive sites in this regard.

Ecological constraints will also require consideration to protect the adjacent LWS. Part of the site is at high risk of surface water flooding.

Based on these constraints, the site is not progressed beyond Stage 2.

13 March 2026



Proposed Submission Consultation
Development Strategy Team
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Dear Sir / Madam,

RUGBY BOROUGH LOCAL PLAN 2025 – 2042: REGULATION 19 PROPOSED SUBMISSION VERSION CONSULTATION
ARCHDIOCESE OF BIRMINGHAM – SITE 344: SUNNYCROFT FARM, CLIFTON-UPON-DUNSMORE

On behalf of the Archdiocese of Birmingham ('AOB'), we are writing to respond to the Rugby Borough Local Plan ('NP') Regulation 19 Proposed Submission Version consultation.

Part 1: The Opportunity at Sunnycroft Farm, Clifton-upon-Dunsmore

AOB has an interest in two parcels of agricultural land comprising circa 8.9 hectares (22.1 acres) to the north and south of Station Road, Clifton-upon-Dunsmore (the 'Site'). A Site Location Plan has been submitted as Appendix 1 to these representations.

The Site is located adjacent to the existing western settlement boundary of Clifton-upon-Dunsmore and is considered to represent a logical and sustainable extension to the existing settlement, which is categorised as a 'Main Rural Settlement' in the adopted Rugby Local Plan and proposed to be retained as such in the Regulation 19 draft. Main Rural Settlements comprise the second of three proposed tiers of the settlement hierarchy, behind the main town of Rugby. As such, AOB is promoting the Site for allocation in the emerging Rugby Local Plan.

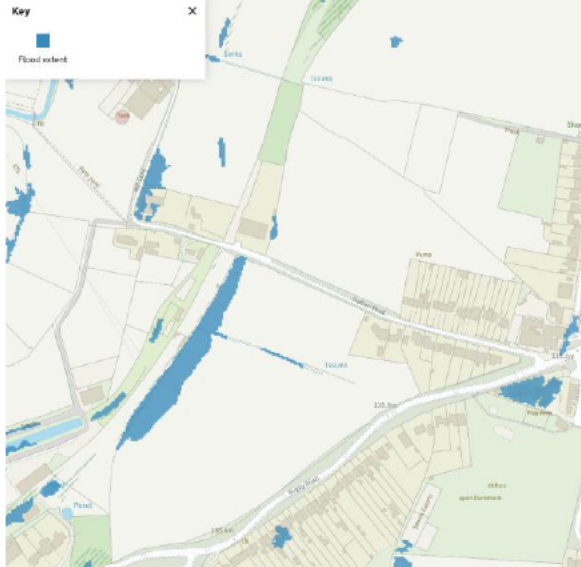
The Site is considered to be suitable and available for residential development and is free from any significant constraints which would preclude development. The Site has previously been submitted to the Call for Sites exercise and was assessed in the Housing and Economic Land Availability Assessment ('HELAA') Addendum (October 2024) as site reference 344 ('Sunnycroft Farm, Clifton-upon-Dunsmore'). An extract showing the HELAA addendum Stage 1 assessment for the Site is contained as Appendix 2 to these representations. This identifies that the Site is available, achievable and potentially suitable for development of 120-150 dwellings, and does not identify any significant site constraints. A further Stage 2 Site Options Assessment (December 2025) was then undertaken to consider all 'potentially suitable' sites which would require changes to policy. An extract showing the Stage 2 assessment for the site is provided as Appendix 3 to these representations. The Site was discounted for a number of reasons, which are addressed in the table below:

| Reason for Non-Selection | AOB Comments |
|---|---|
| <i>The site forms part of a proposed area of separation in the draft plan given its important role in maintaining separation between Clifton Upon Dunsmore and Rugby. Clifton-upon-Dunsmore is a nucleated hilltop village and the development of the site would detract from that character by developing the valley slopes between the village and the valley of the Warwickshire Avon.</i> | As set out in our response to Policy EN4 (Areas of Separation) below, we consider that the proposed Area of Separation covering the land between Clifton-upon-Dunsmore and Rugby should be deleted. This should therefore not present a constraint to development at this site. |

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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| | |
|--|---|
| <p><i>There are potential heritage constraints due to proximity to conservation area and designated heritage assets within 100m of the site. There are medium landscape constraints, making it one of the more sensitive sites in this regard.</i></p> | <p>Whilst it is noted that there are various listed buildings and a Conservation Area within Clifton-upon-Dunsmore, this does not necessarily preclude sensitively designed development coming forward in the vicinity of these assets. To this end, three other sites in Clifton-upon-Dunsmore have been selected for allocation despite heritage constraints which impact the whole village. As written, this policy is unsound because it does not provide sufficient justification and is therefore contrary to paragraph 36 of the NPPF.</p> |
| <p><i>Ecological constraints will also require consideration to protect the adjacent LWS.</i></p> | <p>As with any development site, a full suite of relevant ecological surveys would be undertaken prior to the submission of a planning application. This would also take into account any impacts on nearby designations, including Local Wildlife Sites. This is therefore not considered to be a significant constrain to development.</p> |
| <p><i>Part of the site is at high risk of surface water flooding.</i></p> | <p>As shown in the below extract from the Environment Agency flood risk map for planning, a localised area in the west of the site is at risk of surface water flooding. Given the location of this flood risk area in a part of the site which is furthest from the main settlement, it is considered that development could easily be avoided in this area as part of any proposed scheme. As set out in the PPG¹ (see diagram 1), LPAs are required to take account of whether there are potential impacts of development on surface water flood risk. These impacts could include positive impacts derived from a new drainage system which assists in the management of existing surface water flooding. It would appear that the Council has not considered this and so we consider that the policy is contrary to paragraph 36 of the NPPF because it is not justified or effective.</p>  |

In summary, we consider that land at Sunnycroft Farm represents an available, achievable and suitable site for inclusion as a housing allocation in the emerging Local Plan. The constraints identified by the Stage 2 site

¹ Paragraph: 007 Reference ID: 7-007-20220825



assessment can all be overcome through scheme design and the implementation of suitable mitigation measures.

We have set out in Part 2 of this letter our response to the Regulation 19 Local Plan, which we request is taken into account as part of the Examination of the plan. We request that we are kept up to date with the plan and reserve the right to request to attend the upcoming Local Plan Examination hearings in relation to the points raised in this response.

Part 2: Regulation 19 Consultation Response

Objectives, Strategic Priorities and Policies

Whilst page 6 of the submission Local Plan contains a list of 6 objectives for the plan, there is a notable lack of clarity as to the overall vision for the plan. NPPF paragraph 15 states that “*Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings*” (Savills emphasis).

It is also considered that further detail could be added to the proposed objectives to make reference to the need to address and meet the Borough’s development needs and addressing other economic, social and environmental priorities as required by NPPF paragraph 15.

Plan Period

Currently, the plan period is proposed to run until 2042. According to the Council’s most recent Local Development Scheme (October 2024), it is proposed that the plan will be submitted for Examination by June 2026, and adopted by June 2027. It is well-documented² that Local Plan Examinations can be lengthy and subject to delay, particularly where additional evidence is requested and main modifications consultation(s) are required. Should the adoption of the Local Plan slip into 2028, this would prevent the plan from complying with the requirement, as set out in NPPF paragraph 22, for strategic policies to look ahead over a minimum 15 year period from adoption.

Therefore, we recommend that the plan period is extended by 1 - 2 years and that additional housing sites, including land at Sunnycroft Farm, Clifton-upon-Dunsmore, are identified to meet the additional housing need (in the order of 636 – 1,272 dwellings, plus windfall allowance and buffer) which will arise from this.

Policy S1: Settlement Hierarchy

AOB **objects** to Policy S1, on the basis that part A(ii) does not allow sufficient flexibility to meet additional housing needs which may arise during the plan period and could reasonably be met on land adjacent to main rural settlements including Clifton-upon-Dunsmore.

In general, it is considered that Policy S1 sets out a suitable settlement hierarchy for the plan area. It is considered to be reasonable to place Rugby at the top of this hierarchy, given its obvious primacy as the largest settlement within the LPA area by a considerable margin. It is also considered that the identification of Clifton-upon-Dunsmore as a ‘Main Rural Settlement’ (within the second of three tiers of the hierarchy) is reasonable have been suitably identified and are suitably evidenced by the Rural Sustainability Study (December 2024). This study notes at paragraph 4.1 that Clifton-on-Dunsmore ranks 7th out of 35 rural settlements within the plan area, confirming its sustainability in terms of its proximity to local facilities, services and transport options. Paragraph 4.13 of the study confirms that Clifton-upon-Dunsmore should be retained as a Main Rural Settlement in the emerging plan, along with the other current Main Rural Settlements.

However, we object to the current wording of part A(i) of the policy, which states that “*Except within settlement boundaries, it is not envisaged that further non-plan-led development will be needed, but if further development is required this should be in proportion to the settlement and would likely be small scale*”. The requirement for expansions of these settlements to be “*small scale*” is not justified by the evidence base for the plan, and is therefore considered to be unsound and contrary to paragraph 36 of the NPPF. We request that evidence is provided that justifies the conclusion reached by the Council that “*further development...would likely be small scale*”.

² Examples include the recently adopted Charnwood Local Plan and the withdrawn Solihull and Shropshire Local Plans, which were all at Examination stage for 3+ years.

As set out below in our response to Policy S2, it is considered that additional development should be directed towards Clifton-upon-Dunsmore. It is noted that paragraph 3.1 of the Rural Sustainability Study identifies that there are currently 421 dwellings in Clifton-upon-Dunsmore. As set out at draft Policy S6, there are a total of 150 dwellings allocated proposed to be allocated in the pre-submission plan on land adjoining Clifton-upon-Dunsmore, representing a 35% expansion of the existing settlement. With this level of expansion already accepted and endorsed by the Council, this points towards Clifton-upon-Dunsmore being a highly sustainable settlement which is capable of absorbing significant development during the plan period. Should windfall sites come forward during the plan period to meet housing needs which were not already anticipated by the plan, then it is considered that these should be positively determined where technical work demonstrates that their approval would not lead to unacceptable impacts on infrastructure or local services and facilities.

In order to make the plan sound, it is considered that Part A(i) of Policy S1 should be amended to remove reference to any windfall development at Main Rural Settlements being restricted to “*small scale*” proposals only. Whilst it is accepted that new development should be of a quantum which is proportionate to the existing development and should not lead to unacceptable pressures on local facilities and infrastructure, this can be effectively measured via the development management process and so the policy should be amended to ensure that it is positively worded in accordance with paragraph 36(a) of the Framework.

Policy S2: Strategy for Homes

AOB **objects** to Policy S2 on the basis that insufficient justification has been provided to support the proposed strategy and there is an overreliance on large sites to meet the identified housing requirement.

Paragraph 1.20 of the Regulation 19 plan states that the housing target of 10,812 homes during the plan period will meet the minimum local housing need, as calculated using the Government’s standard method. NPPF paragraph 62 is clear that the standard method represents the minimum housing need, which should be used to “inform” the Local Plan via a local housing need assessment. Therefore, we consider that a positive approach should be taken for planning for additional homes beyond the standard method requirement, in particular where an additional buffer could be included to mitigate against any non-delivery of proposed allocations.

It is also anticipated that the standard method calculation will be updated before the plan is adopted in order to take account of revised affordability data. Therefore, there is a reasonable likelihood that the standard method could increase before the plan is adopted, and so it is considered that a further buffer should be added in addition to the 8.5% already provided.

Paragraph 1.21 of the submission plan states that much of the housing growth required to meet the Borough’s housing need is already committed through the Houlton, South West Rugby and Eden Park large sites. Combined, these three sites are proposed to contribute 7,167 dwellings (61%) of the total 11,729 proposed dwellings. NPPF paragraph 23 also makes clear that “*strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development*”. Whilst it is recognised that these sites are committed developments, it is considered that an overreliance has been placed on large sites to deliver a significant proportion of the housing requirement, which brings associated risks in terms of ensuring consistent housing delivery across the plan period, as well as maintaining a 5 year housing land supply.

NPPF paragraph 73 also states that “*small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly*”. National planning policy is therefore supportive of a mix of site sizes being included in Local Plans to ensure sufficient delivery to maintain a suitable supply of housing. It is also noted that the Housing Trajectory set out at Appendix 1 of the plan does not predict that the standard method housing requirement will be met until 2029/30. It is considered that the allocation of additional smaller sites could help to maintain supply and lessen the risk of underdelivery. The Government is placing a clear evidence on the role that small and medium sized sites can play in meeting housing needs. In addition, the 2025 draft NPPF (December 2025) also supports the delivery of a diverse mix of sites.

In order to make Policy S2 sound, additional sites should be allocated to ensure that sufficient flexibility is provided to account for any increase in the standard method calculation of local housing need up until the adoption of the plan, along with any underdelivery at the identified strategic sites. As set out above, it is also considered that the plan period should be increased by 1-2 years, which would give rise to a need for an minimum additional 636 – 1,272 dwellings across the plan period.

It is considered that Clifton-upon-Dunsmore would be a suitable location to deliver additional growth on top of the 150 dwellings already proposed. This settlement is sustainably located near to the main town of Rugby, and is importantly one of only two of the nine Main Rural Settlements which are located outside of the Green Belt. Land at Sunnycroft Farm (site ref: 344) is considered to be available and suitable for development, as set out in the October 2024 HELAA addendum. The Site was discounted following the proposed designation of an Area of Separation covering the site. However, our response to Policy EN4 explains that it is unreasonable to designate an Area of Separation in this area, as it unnecessarily restricts the growth of Clifton-upon-Dunsmore (which is already robustly separated from Rugby by flood risk associated with the River Avon).

Policy S6: Residential Allocations

Policy S6 sets out a schedule of proposed residential allocations, including 150 dwellings at Clifton-upon-Dunsmore. We consider that, Clifton-upon-Dunsmore is a highly sustainable settlement, as reflected by its scoring in the Rural Sustainability Study (December 2024) and proposed designation as a Main Rural Settlement in Policy S1. In our response to Policies S1 and S2, we set out that the Borough should look to provide additional housing over and above the standard method housing need, particularly on small and medium sites to ensure that a 5 year housing land supply can be maintained. Accordingly, Clifton-upon-Dunsmore should be subject to additional growth over the plan period to reflect its sustainable location and to enable Policies S1 and S2 to be found sound.

We request that land at Sunnycroft Farm, Clifton-upon-Dunsmore (Site ref: 344) is added to the list of sites identified in Policy S6.

Policy EN4: Areas of Separation

AOB **objects** to Policy EN4, which seeks to designate an area of separation ('AoS') between Clifton-upon-Dunsmore and Rugby, as identified by the green hatching on the below extract from the Regulation 19 policies map:

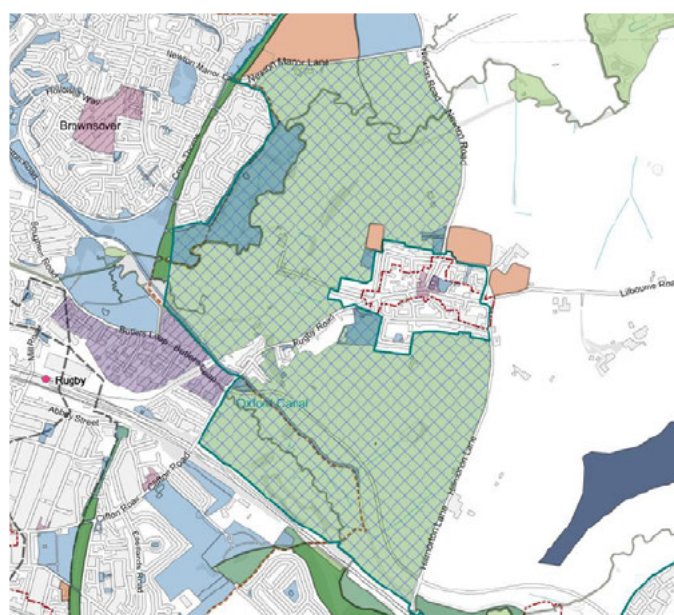


Figure 1: Rugby Submission Local Plan Policies Map Extract

The Areas of Separation Study Report (November 2025) provides evidence in relation to the area around Clifton-upon-Dunsmore. In considering the existing gap between Rugby and Clifton-upon-Dunsmore, this report correctly identifies at paragraphs 6.2 – 6.5 that there are considerable areas of land which are constrained from development in this area, including areas of Flood Zones 2 and 3 associated with the River Avon (shown below in an extract from the report). As identified by paragraph 6.12 of the report, the Oxford Canal also separates the two settlements.

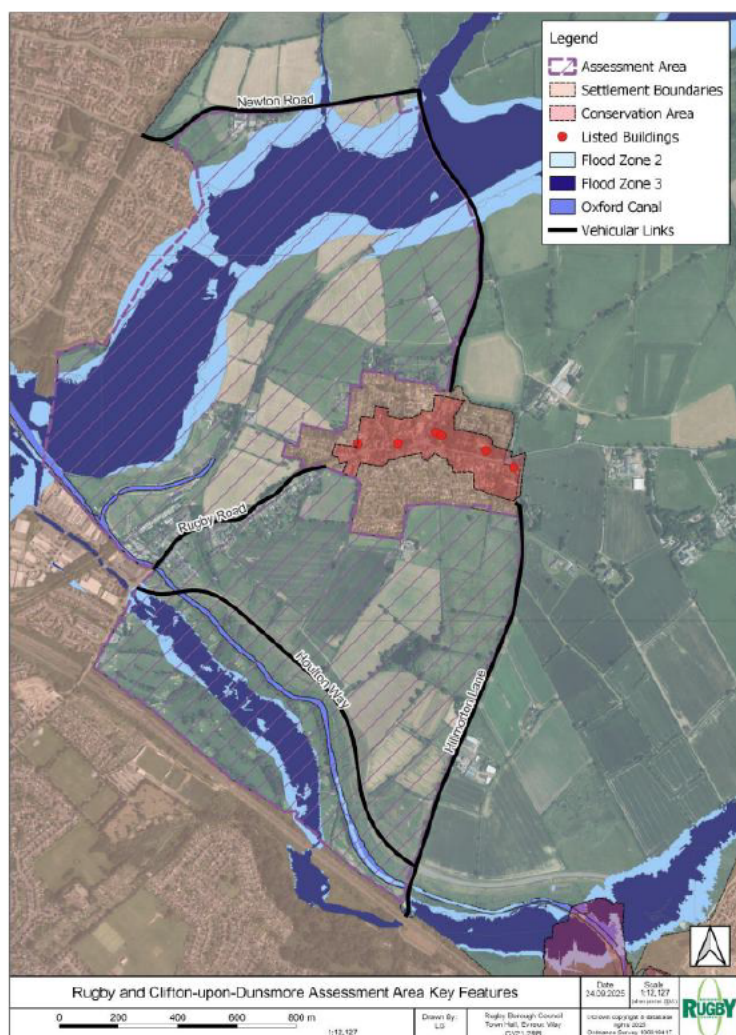


Figure 2: Extract from the Areas of Separation Study Report (November 2025)

As shown above, there is an area of flood risk to the immediate east of Rugby which is substantially Flood Zone 3 where more vulnerable development such as residential will be unsuitable. Thus, this will maintain a gap between Rugby and Clifton-upon-Dunsmore which will not come under future development pressure. There is therefore no need for an AoS to be designated in this instance. As written, the plan proposes an area of separation which is not considered to be justified, effective or positively planned (contrary to paragraph 36 of the Framework) and should be deleted.

We also consider that the designation of this AoS directly conflicts with the proposed settlement hierarchy, which proposes that Clifton-upon-Dunsmore is retained as a 'Main Rural Settlement', constituting the middle of the three proposed settlement hierarchy tiers. This indicates that Clifton-upon-Dunsmore is one of the most sustainable settlements in the LPA area and is therefore suitable for growth and expansion to meet housing

needs. Conversely, Policy EN4 limits growth to the eastern side of the village, which could reasonably be considered to be less sustainable owing to its increased distance from Rugby.

It should also be noted that Clifton-upon-Dunsmore is not located within the Green Belt, and so this settlement should be a sequentially preferable village for growth. The introduction of an AoS is inappropriate, ineffective and represents a negative approach to plan-making. Of the 9 main rural settlements, 7 are surrounded by Green Belt, leaving Clifton-upon-Dunsmore as one of only two main rural settlements which are relatively unconstrained for development. As set out in our response to Policy S2 above, we consider that the proposed housing strategy places an overreliance on housing delivery on large sites, which may not deliver the number of homes envisaged in the plan period. Should any of the proposed allocations not come forward or be slow to deliver, we consider that the Local Plan should provide sufficient flexibility to meet housing needs on alternative sites not identified in this plan. However, the designation of the AoS unnecessarily restricts development within a sustainable settlement, and is therefore not justified.

Therefore, we request that the AoS identified between Rugby and Clifton-upon-Dunsmore is deleted from the plan, principally due to it conflicting with Policy S1 (settlement hierarchy). Should Policy EN4 be retained, we request that the wording of the policy is amended to be more flexible to allow for Clifton to expand, should this be required (e.g. if the larger sites (which the plan is relying on) do not come forward in a timely manner). The policy should also confirm that, where there is an identified unmet housing need (for example through the absence of a 5 year housing land supply), this policy will be disregarded to enable suitable development to come forward, in sustainable locations, to meet housing needs.

We trust the above is helpful and request to be kept informed with progress on the Local Plan.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Michael Davies
Director

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

Mr

First Name

Michael

Last Name

Davies

Job Title
(where relevant)

Director

Organisation
(where relevant)

Archdiocese of
Birmingham

Savills (UK) Ltd

Address Line 1

C/o agent

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

(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?

| | | | | | |
|----------------------|-----|-------------------|-----------------------------|--------------|--|
| Local Plan Paragraph | | Local Plan Policy | Policies S1, S2, S6 and EN4 | Policies Map | Amend to remove Area of Separation covering site 344 and allocate this site. |
| Site ID | 344 | | | | |

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.

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.

Please see attached full representations.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached full representations.

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

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

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

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

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

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

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

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

To provide oral evidence and engage in the Examination discussions on this matter.

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

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

N/A

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

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

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

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

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