

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 **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	Mr	
First Name	Peter	
Last Name	Dignan	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Num		
E-mail Address (where relevant)		

Part B - Please use a separate sheet for each representation

Name or Organisation:

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

Local Plan
Paragraph

Local
Plan
Policy

Policies
Map

Site ID

307

4. Do you consider the Local Plan:

(1) is Legally compliant

No

(2) is Sound

No

(3) complies with the
Duty to co-operate

Yes

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.

I am writing to formally object to the allocation of Site ID 307 in the Rugby Borough Council Proposed Submission Local Plan. I believe the inclusion of this site renders the plan unsound for the following reasons:

1. Severe Infrastructure Constraints (Not Effective)

Under the NPPF, a Local Plan must be effective and deliverable. Site 307 is served primarily by North Road, which is a narrow, rural lane with significant physical constraints.

The road width is insufficient to allow two-way flow for heavy goods vehicles (HGVs) or emergency service vehicles without mounting verges or endangering pedestrians.

The plan provides no evidence that a safe, compliant access point can be achieved without third-party land or significant destruction of the existing street scene and hedgerows.

Because the site cannot be safely accessed, it is not deliverable within the plan period.

2. Highway Safety and Sustainable Transport (National Policy NPPF Para 115)

The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety.

North Road already serves as a key route for residents and farm machinery. Adding the cumulative traffic from Site 307 onto this narrow corridor creates a high risk of collisions. There is a lack of continuous, safe footways on North Road. Forcing additional pedestrians (including children) onto a road with narrow carriage-widths and no refuge is inconsistent with national policy regarding safe and sustainable transport.

3. Impact on Village Character (Not Justified)

The scale of development proposed for Site 307 is disproportionate to the capacity of the narrow lanes that define the character of North Road. The "urbanising" effect of the required highway widening (if even possible) would cause significant harm to the rural character of the village entrance.

Conclusion:

For the reasons stated above, Site ID 307 is physically unsuitable for the scale of development proposed. It should be removed from the Local Plan as it fails the tests of being Effective and Consistent with National Policy.

(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.

A much better plan than the proposed sites for Clifton upon Dunsmore, would be to allow the application south of Lilbourne road to progress. This development of 160 houses would contain all of the housing requirement for Clifton upon Dunsmore in a single location. The development would attract a CIL payment, which would be of significant benefit to the local community. As the developer is already seeking planning permission, this site could be developed quickly, contributing to the housing requirement for Rugby without any delay.

(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)

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:

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.

I have used Google AI to help with some of the technical aspects of the Reg 19 process.

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>