

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		
First Name	Chris	
Last Name	Dixon	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
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

59

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

(2) is Sound

Yes

(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.

This site is a good proposal in terms of layout and as presented by the developer has significant areas of green space, canopy cover and community space. I strongly support. The development however will be potentially disastrous without serious work on Newton Manor Lane. This road is currently dangerous with the level of traffic it sees. With a significant increase and junctions along the road as well as a bus service stopping in the road it will become unviable. The road has blind dips, is narrow and will require serious investment. In addition the junction at The Thomas Cross Pub is a known accident spot. Accidents are a common occurrence and near misses happen multiple times per day. The junction is not intuitive and inexperienced drivers or people encountering it for the first time often make mistakes leading to collisions. The junction also has poor visibility and lighting. There is also a lot of concern from residents near to the development that the water from this site will add to the drainage load in the adjacent waterways and cause additional flooding. Although a

topic for the final application I think reference and acknowledgement of this concern in the Development Requirements stipulating any surface water be treated in situ to ensure no down stream effects would be prudent.

(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.

I would suggest that the design requirements are strengthened with regard to the traffic situation ensuring that a major revamp of Newton Manor Lane and the junction at the cross pub is considered mandatory for the site to go ahead. Also the opportunity is taken to incorporate more walking and cycling infrastructure aligned to a re-worked ICWIP.

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

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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)?

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:

I know first hand the dangers of the the road. I have personally witnessed 2 accidents occur on this stretch of road and observed countless near misses and the aftermath of many accidents.

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Part A

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2. Agent's Details (if applicable)

Title		
First Name	Chris	
Last Name	Dixon	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
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	Infrastructure I1 Transport	Policies Map	No
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Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

(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.

Local Walking and Cycling Infrastructure Plan

I do not believe the LCWIP is robust and requires review and update. It has been somewhat overlooked in preference of other elements of the plan. In particular there does not appear to be any real strategy in place in the plan. The LWCI provision in the North of Rugby in particular is very disjointed. There are elements of decent provision however, it is not linked together meaning that many frequent journeys are not served by the provision. In addition as the volume of houses and employment increase in the area, the infrastructure requirement is significantly increased. A significant review needs to be conducted but some immediate observations to serve as examples are; the new provision of a cycle lane from Houlton is great but throws the cyclist out at Butlers Leap Junction with no further provision. The Canal Tow Path from Houlton in the East running all the way to Newbold in the West has significant areas that are effectively impassable by bicycle. With a re-surfacing program a

high value route would be in place. With improvement this could be a sustainable cost effective commuting corridor. The GCW could serve as another such existing corridor if improved. This would provide a traffic free corridor from The North of Coton, through Newton, Brownsover and into Mill Lane and the Station. This “only” requires resurfacing and ideally a pedestrian bridge between crossing Newton Manor Lane.

In light of the major developments and the potential for Section 106 contributions I think it is beholden on the Council to ensure this budget is well spent to maximise the benefits for residents and a more robust approach is needed with more thought and strategy.

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

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A re-worked and relevant LCWIP should be commissioned with a focus on value for money, optimisation of current infrastructure and a plan to link the patches of good infrastructure that exists. This should take account of the update local plan and also drive the section 106 contributions enforced as part of the developments.

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

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

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I think input from active people that are using the current infrastructure is essential. Unless you are trying to use the infrastructure for travelling you will not realize how disconnected it is and how much opportunity is being squandered.

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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		
First Name	Chris	
Last Name	Dixon	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
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

Environment EN4 Areas of
Separation

Policies
Map

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

(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.

Very supportive and encourage the objective of the policy and its inclusion in the plan. However, the reasoning of the decision to not include any protection for Newton village is unsound. The area available to be nominated as an area of separation to the west of the village is indicated to be small and therefore not worthy of inclusion. This logic is flawed and I would argue the reverse is actually true. Because it is small the need is even greater to allocate it and to protect the village from coalescence. This reasoning is strengthened further by 2 Planning in Principle applications being recently granted for 16 properties outside of the village boundary and in this exact area at the end of Pilgrims Lane. This would effectively reduce the gap even further. I also believe that with site 202 narrowing the gap between Clifton and Newton, and no protection being in place in that direction the land East of Newton Road should also be nominated as an area of separation. With these allocations made the policy would be sound and applied consistently.

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The policy should be reviewed and the same focus given to all villages to ensure they are protected. Individual villages should not get different treatment. Specifically the area of separation should be extended to the West of Newton to protect the last remaining gap between it, Brownsover and Coton Park and also proposed site 59. This would be the minimum to have treated Newton like other villages. This may have occurred with other villages, but I am unaware of the detail of those.

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

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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:

Newton village needs to be treated as an equal to other villages. I strongly believe it deserves a chance to argue its case for the same protection as others have been afforded.

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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

Chris

Last Name

Dixon

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

(where relevant)

2. Agent's Details (if applicable)



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 Map	
Site ID	64 Coton Park East				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	No
(3) complies with the Duty to co-operate	Yes	Yes	No	

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 firmly believe that the proposal for the Coton Park East Development (Site 64) is currently unsound, without further investigation and potential pre-development works, primarily in relation to the traffic and highway infrastructure situation at and surrounding, the M6 Junction 1 Interchange and A5/A426 Gibbets Cross Roundabout. What this promotion ignores are the daily issues already experienced by drivers (both car and lorry) with gaining access to and from the M6 Junction 1 Interchange and to the A5 and M1 north via Gibbets Cross.

Whilst it may be argued that the number of traffic movements won't increase above those already permitted, the increase of employment in lieu of residential means that many more of these movements will be undertaken by 44-ton trucks.

The NPPF is clear in Paras 115 and 116 that significant impacts in terms of capacity and congestion should be mitigated and that planning permission can be refused if the cumulative impact is severe.

There is significant concern that such a large site will contribute to already strained drainage in the area and this will further impact local flooding issues. Evidence for this is hard to come by for the public as it requires data from multiple agencies.

This site was agreed by the Development team to have a design code completed to protect the residents from unnecessary negative impacts from the development of this site. This was to include detail on the a number of factors. This design code is not complete so the protection being suggested is not visible. Without this I believe the

plan is “incomplete” whilst a design code is technically a supplementary document it is essential (as agreed by the development team) in this instance due to this being an extensive and large scale industrial development adjacent to a residential area, nature zone etc.

I hope that as part of the site 64 CPE development there can be a real effort to offset the loss of recreational space by the introduction of some good quality routes through the new development. Again I would expect a design code to have covered this. However, we are at the Section 10 Consultation deadline and the code is not yet available.

As I have mentioned, this land has been “empty” now for many years. As such it has been adopted by local residents as a place to exercise and enjoy. It is particularly popular with dog walkers. As the developments in Coton Park have become populated the GCW has become increasingly busy at times. Mixing off lead dog walking and runners / cyclists can be problematic. The Coton Park East site provides a very good alternative to the GCW.

There are several PROWs on the site that I believe will largely be retained. However, the extent of land used by residents extends beyond the formal PROWs. I have drafted a map to attempt to illustrate the areas currently used. The adjacent industrial site that is under construction has already provided provision to link to this site in plans and now built.

I suggested a path network through the development that I believe would have little impact on the overall development plan but have a huge positive impact on residents. The suggestion would be to use the non-developed perimeter and link up to the PROW to form a more extensive network that could be enjoyed. I would envisage an access from the Five Arches wildlife site so the existing parking could be used. The trail would then follow the perimeter around to the existing PROW at the Northwest Perimeter (This PROW is currently closed until September 2026 but provision is in place to link to it) The trail would then link to the PROW and follow that with another new loop going around the proposed school fields and through the buffer between Chervil Way and the development before rejoining the PROWs.

Ideally the trail would be accessible to as many people as possible with use of materials suitable for year-round use and rolling activities (such as cycles, push chairs and wheelchairs.) I would also expect it to be safe and secure with separation from traffic and outside of any secure areas needed for the buildings.

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

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A substantial and comprehensive traffic assessment to be conducted and recommendations implemented to ensure current concerns are improved or at worst case not exacerbated by the development.

A design code should be completed and made available for review. The code should address the recreational use of the land post development and improve that for the local community rather than degrade it.

The code should ensure the employment development and the residential areas coexist appropriately by incorporating substantial buffer zones and building restrictions and other strategies to blend rather than impose the new development.

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

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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

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:

Having worked as part of the Newton and Biggin and Coton Park Community action groups I believe I have a great deal of insight to this particular development, the challenges and opportunities. I am also a daily user of the space so understand the impact the development will have on many in the community.

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