

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*

2. Agent's Details (if applicable)

**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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Claire"/>	<input type="text"/>
Last Name	<input type="text" value="Edwards"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<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 representation

Name or Organisation:

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

Paragraph Policy Policies Map

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

No

(2) is Sound

No

(3) complies with the
Duty to co-operate

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.

The designation of this landscape has been prioritised for political reasons over other potential landscapes. The evidence base doesn't justify this protection especially when considered more broadly with Rugby's housing need. Specifically, this designation has resulted in Rugby removing sites that site on its perimeter and instead place them in Green Belt land and in rural village communities. Paragraph 11 a in the NPPF states that plans should promote a sustainable pattern of development and given the already levels of housing, employment land, local services, transport around this 'landscape' the designation shouldn't be used to exclude further housing development in this area. The sites that are located in this area are the MOST sustainable sites in the Borough and therefore this policy conflicts directly is Paragraph 11 a of the NPPF.

(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.

Sites that sit within this area should be included in the plan for housing and then the designation applied to the remaining area.

(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:

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>

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Duty to co-operate

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H2 states that 40% of housing on land released from green belt is designated as 'affordable housing'. The evidence base states that this 40% will help to bump up the rest of the borough's poor affordable housing delivery, principally because 'strategic sites' have failed to deliver enough affordable housing.

The viability assessment completed argues that green belt land can better deliver affordable housing as the development costs are lower due to less infrastructure being needed and that it's cheaper to build than PDL land.

Firstly the viability assessment uses a very low figure for calculating the cost of former agricultural land - a range of 10 to 17 times the agricultural cost, whereas it's known that often in sought after villages the cost of this land can reach 50 times the value. So the viability assessment has looked too narrowly at the potential land cost, artificially increasing

the deliverability.

Secondly, the viability assessment has underestimated the biodiversity net gain cost on green belt land as it hasn't taken in to account the higher base line that these sites have. Again over estimating the delivery.

Most concerning about this policy is that it doesn't take in to account the needs of citizens, particularly on low incomes and instead is focussed on the needs of house builders and deliverability. People on low incomes are more in need of good active travel and public transport for access to education, health, wellbeing and employment.. Citing 40% of affordable housing in green belt locations where car ownership is essential is just pushing additional costs on to low income families - negating the benefit they may get from affordable housing.

This policy conflicts with paragraph 11 a of the NPPF and paragraph 110

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

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Affordable housing in rural areas should be community lead and be in line with sustainable patterns of development, particularly in respect of the proportional increase in the size of villages.

(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)

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 represent citizens on low incomes and to advocate for their need to good housing in well connected locations

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