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*	2. Agent's Details (if applicable)
Title		
First Name	Jonathan	Rob
Last Name	O'Neill	Wells
Job Title (where relevant)		
Organisation (where relevant)	[redacted]	[redacted]
Address Line 1		[redacted]
Line 2		[redacted]
Line 3		[redacted]
Line 4		
Post Code		[redacted]
Telephone Number		[redacted]
E-mail Address (where relevant)		[redacted]

**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.*

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

Name or Organisation: Inside Land Group Ltd

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

Paragraph		Policy	S1(ii)	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

Overall the policy is supported however clause (ii) is not sound or precise. Settlement boundaries need to be redefined to include the sites that are proposed to be allocated but which are currently outside/adjacent to the existing defined boundaries not only for clarity but also to ensure that the development is not restricted by the limitation on development outside of settlement boundaries.

(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.

If the Settlement boundaries are not amended to include the relevant sites, the wording should be amended as follows:

"…and through neighbourhood plans. Except within settlement boundaries and within Sites allocated by this Local Plan, it is not envisaged that further non-planled development will be needed,…"

(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:

In order to ensure that a sensible approach is adopted to defining Settlement Boundaries to ensure that development of those sites is not constrained in the future.

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.*

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

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

Name or Organisation: Inside Land Group Ltd

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	Yes	☒	No	
(2) is Sound	Yes		No	☒
(3) complies with the Duty to co-operate	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.

Comments cross over with those made to Policy S1(ii).

Settlement boundaries need to be redefined to include the sites that are proposed to be allocated but which are currently outside/adjacent to the existing defined boundaries not only for clarity but also to ensure that the development is not restricted by the limitation on development outside of settlement boundaries.

(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.

Proposed Settlement Boundaries – including those for Clifton upon Dunsmore, should be redrawn to include the Sites proposed for development.

Continue on a separate sheet /expand box if necessary)

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In order to ensure that a sensible approach is adopted to defining Settlement Boundaries to ensure that development of those sites is not constrained in the future.

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.*

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

Name or Organisation: Inside Land Group Ltd

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

Paragraph		Policy	S2(A)	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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The policy as written provides for a maximum number of dwellings to be provided over the plan period. This is based upon the annual figure required through application of the standard methodology. NPPF para 62 notes that this should be used to determine the *minimum* number of homes required not define a maximum.

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

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Recommend amended wording amended as follows:

"A. To meet our future need for housing, a minimum of 10,812 new homes will be delivered in the period 2025-2042 (636 each year)."

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

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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.

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

Name or Organisation: Inside Land Group Ltd

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

Paragraph		Policy	S5 (A)	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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Comments cross over with those made regarding Policy S1 and the Policies Map with regard to the definition of Settlement Boundaries.

The intention to protect open countryside from inappropriate development is acknowledged however, as written the policy is not fully clear as to its implementation/restriction on proposed site allocations. Proposed allocations should be included within the proposed defined Settlement Boundaries.

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

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Recommend amended wording amended as follows if the proposed Settlement boundaries are not redrawn to include Sites proposed for development:

"A. Outside of the settlement boundaries shown on the policies map or sites allocated for development though this plan, new development will only be permitted where it is in accordance with a policy of this plan which supports development in such locations.

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

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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.

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

Name or Organisation: Inside Land Group Ltd

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

Paragraph		Policy	S6 (A)	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	☒	No	
(2) is Sound	Yes		No	☒
(3) complies with the Duty to co-operate	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.
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Support the proposed allocation of Site 202 Newton Road, Clifton upon Dunsmore. However, in line with comments made on Policy S2, the proposed number of units identified for each site should be expressed a minimum as, subject to other policy requirements (eg heritage, BNG), it may be case that the detailed design of development may result in more dwellings being able to be accommodated without adverse impacts and thereby making the most effective and efficient use of land. As worded, the policy does not make allowance for this.

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

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A. The sites shown on the policies map, included in the Table below and set out in the development site allocations annex to this plan are allocated for a minimum amount of development, as detailed below and would be consistent with the Site allocation principles in the Annex which do not state maximum delivery figures (eg Site 202 is identified for circa 80 dwellings).

(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)?

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

To ensure that the Policy is consistent with the wording of Policy S2 and S6 Annex to state minimum levels of provision and to provide a level of flexibility in the delivery of development on the Sites subject to detailed design and other policy considerations.

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.*

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

Name or Organisation: Inside Land Group Ltd

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

Paragraph		Policy	S6(B) and Annex	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	☒	No	
(2) is Sound	Yes		No	☒
(3) complies with the Duty to co-operate	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.
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These are considered together as the matters are interlinked.

Policy S6(B) states that development of the identified "shall accord with the development principles set out in the development site allocations annex of the plan." Supporting para 1.34 states that the annex provides "more detailed development principles" for the sites.

The annex states: ..the principles in this annex should be read "as if it is incorporated into the policy text" …and the "plans augment the text and provide a visual illustration of the development principles."

We consider this to raise a number of issues:

Despite the annex stating that the provisions of the annex should be read as if being incorporated into the policy text, they are not and therefore cannot be considered policy– the statement should be removed from the annex.

The tables for each site identify the development principles for that site. Unless there are specific reasons to the contrary, the interpretation and application of these principles should be for the developer to consider of their design/layout as opposed to almost being prescriptive. For

For example for Site 202 under the Clifton upon Dunsmore sites – the provisions for non-vehicle connections are overly prescriptive and leave no scope to vary a potential layout. It is accepted that a development principle should be to ensure suitable non-vehicle connection/routes are made within the site but the specific

routes should be a matter for assessment at design stage and should be removed from the plan.

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

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The introduction to the annex should be amended:

This annex provides details for the development site allocations under Policies S6 (Residential allocations) and S7 (Employment allocations). Those policies state that the development of the allocated sites shall accord with the development principles set out in this annex~~. which should be read as if it is incorporated into the policy text~~. For some sites, development principles plans have been included in this annex for illustrative purposes. ~~These plans augment the text and provide a visual illustration of the development principles.~~

The non-vehicle routes (other than the proposed connection points on the site boundaries) identified on the plan for Ste 202 should be deleted.

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

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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:

In order to ensure the proper planning of the Site and avoidance of unnecessary prescription.

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.

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

Name or Organisation: Inside Land Group Ltd

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

Paragraph		Policy	CL1	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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Development should not be required to provide measures over above national standards or adopted required Building Regulations or any publication of The Future Homes and Future Building Standards.

Separately it is unclear how proposed monitoring post house sale would be achieved and whose responsibly it would be.

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

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Amend wording:

Part A – New buildings comprising one or more dwellings and new non-residential buildings of 100m2 gross internal area or more must be designed and built to meet required Building Regulation Standards.

New Part B – Development will be further supported in particular if it is designed to:

i. be ultra-low energy,

ii. be fossil fuel free (except where the use of fossil fuels is technically necessary for emergency and life-safety systems or essential systems serving buildings with critical functions), and

iii. generate at least the same amount of renewable electricity on-site as the electricity they demand over the course of a year, such demand including all regulated and unregulated energy use, or

iv. if iii is not technically achievable for a particular building typology in its context, on-site renewable energy generation shall be fully maximized as practicable

Delete existing Parts B and C

Amend Part D

Proposals that are built and certified to Passivhaus Classic or a higher Passivhaus standard will be ~~deemed to meet space heating demand and EUI requirements under paragraph B and/or paragraph C.~~ required to demonstrate ~~Demonstration of~~ compliance with the requirements in paragraph ~~A~~ B for development to be fossil fuel free and for onsite annual renewable energy generation capacity to at least equal annual energy demand will still be required.

Supporting paras to be amended accordingly.

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

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

Name or Organisation: Inside Land Group Ltd

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

Paragraph		Policy	EN4	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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Proposed Area of Separation for Clifton upon Dunsmore supported as an additional protective measure on land with particular characteristics compared to more general open countryside.

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

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

Name or Organisation: Inside Land Group Ltd

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

Paragraph		Policy	EN6	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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Support the general aspiration to increase tree cover as part of the sustainability and biodiversity net gain provisions. However a mandatory increase of post development tree canopy cover to 20% of the Site area is considered and arbitrary target with no current background evidence to support it within the district and is considered to have greater impact on the developable areas of small to medium sized sites. It is unclear what assessment that the Council has undertaken to confirm whether the proposal is achievable on sites in conjunction with other policy requirements and the need to deliver specified numbers of houses.

Reference is made (at para 5.15) to use of the Council's approved calculator however no such calculator appears to exist.

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

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Section A be amended:

A. All major development, excluding change of use and development in Rugby town centre, shall increase the post-development canopy cover to at least 20% of the site area (excluding areas of the site that are high or very high distinctiveness habitats) unless such requirement is demonstrated to be incompatible with the minimum amount of required development and/or delivering biodiversity net gain requirements on site.

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

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

Name or Organisation: Inside Land Group Ltd

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

Paragraph		Policy	H1	Policies Map	
Site ID					

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

As worded, the policy potentially frustrates the delivery of sites as wholly affordable schemes. Whilst such proposals would be able to meet the requirements of Part B of the policy in that they deliver houses of different sizes,

They could potentially fall foul of the requirement in Part A to provide a mix of housing tenures if the LPA was to consider that a lack of market housing within a scheme would not create/provide a mixed, balanced, or inclusive community – despite the acknowledged demonstrable need for affordable homes and that they are delivered as a mix of tenures.

(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.

Amend the policy by adding:

C. New housing development comprising only of affordable houses shall provide a mix of housing type and size and shall meet the provisions of Policy H2(B-E).

(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:

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.*

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

Name or Organisation: Inside Land Group Ltd

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

Paragraph		Policy	H7	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

Development should not be required to provide measures over above national standards or adopted required Building Regulations or any publication of The Future Homes and Future Building Standards. Part B of the Policy is considered unduly onerous and to exceed the emerging national policy in Draft NPPF (2025) – Policy HO5 which is only proposing to ensure at least 40% of the dwellings meet M4(2) or M4(3).

(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.

B. ~~All new~~ At least 40% of new dwellings shall meet the requirements for Category 2 – accessible and adaptable dwellings set out in Part M4(2) of Schedule 1 to the Building Regulations 2010 (as amended).

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.

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hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.