

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.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="David"/>	<input type="text"/>
Last Name	<input type="text" value="Lowe"/>	<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" value="██████████"/>	<input type="text"/>
Line 2	<input type="text" value="██████████"/>	<input type="text"/>
Line 3	<input type="text" value="██████████"/>	<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 policy or site you wish to comment on

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	Infrastructure / Settlement Hierarchy	Policies Map	<input type="text"/>
Site ID	315				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	x
(3) complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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 development of this site is contrary to the Settlement Hierarchy Policy 1.16 which seeks to restrict development outside main settlement boundaries. The Policy map would indicate that the development is located outside the main settlement boundary.

The Sustainability Appraisal (SA) identifies east Coventry as not having good transport links and site 315 was categorised as being weak regarding accessibility and connectivity. Policy I 1B, i (Transport) seeks to locate development to mitigate the use of car travel. Given the sites weak connectivity car use will be encouraged, and development of the sites does not meet this policy objective.

Under the Settlement Hierarchy, S1.15 settlements should be directed to locations with good services. Given the sites poor connectivity identified in the SA, this site represents a poor choice and does not fully implement Ruby Borough Councils development policy.

The SA makes no reference to the proposed access on to Heath Lane, particularly as in part this lane is a single carriageway country lane, with no foot patch or lighting and is widely used by both pedestrians and horse riders. Allowing car access on to the single carriageway section of Heath Lane will increase the safety risk to pedestrians and horse riders, contrary to Policy I (Transport) 1B, ii, iii and iiiii.

Upon accessing Heath Lane from the proposed site, at the top of Heath Lane car users have the opportunity to follow this road which becomes a normal carriageway or turn into Green Lane to access Coventry. Green Lane is a single carriageway provided with no footpath, and limited lighting. Any increase in traffic will put pedestrians and horse riders at risk on Green Lane, contrary to Policy I 1 (Transport) B, ii, iii, and iiiii.

The lower section of Heath Lane is a normal road which allows cars to simultaneous pass in opposite directions. While the road is provided with a footpath it diverts from one side to the other side of the road. Any increased traffic from the development will increase safety risks for pedestrians who have to cross this road to maintain their presence on the footpath. Policy objective I (Transport) 1B, ii, iii, and iiiii have not been fully considered given increased risks to pedestrians. In addition, Heath Lane is equipped with extremely large grass vergers and any increase in traffic using this section of health Lane will increase the risk to children who use the grass verge as a play area.

Access on to the single carriageway section of Heath Lane from site 315 is via a sunken road and no consideration has been given to this historical asset and its proposed destruction, contrary to policy D4 (Design) (Historical Environment) paragraph C and policy EN2 Landscape Protection. In addition, the SA makes no mention of the badger set situated in the embankment of the sunken road. Breaching the sunken road will impact biodiversity contrary to policy EN1 A.

While the plan makes reference to exploring and contributing to opportunities to enhance a safe pedestrian and cycle way on an existing bridle path between Brinklow and Brandon, it has not considered extending or providing new paths to connect strategic employment sites at Ansty and Ryton to reduce reliance upon cars and erase the burden on an area that already has poor connectivity.

(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.

Any future development should take places within the current settlement boundary.

To maintain the safety of pedestrians and other users of the highway:

the site should not be provided with vehicle access on to Heath Lane so as to meet Policy objective I (Transport) 1B, ii, iii, and iiiii.

all traffic should enter and exit this site via the Rugby Road entrance to meet Policy objective I (Transport) 1B, ii, iii, and iiiii.

any access on to Heath Lane should be pedestrian access only to meet Policy objective I (Transport) 1B, ii, and vi.

To maintain the sunken road, biodiversity and to fulfil policy D4 (Design) (Historical Environment) paragraph C and policy EN1 and 2 Biodiversity and Landscape Protection the site should not be provided with vehicle access on to Heath Lane.

New pedestrian and cycle routes to connect the site to Strategic Employment sites should be considered

(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 ensure a true and accurate representation is made to the Appointed Planning Inspector concerning the development of site 315.

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-notice>

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Part A

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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?

Paragraph	<input type="text"/>	Policy	Infrastructure / Settlement Hierarchy	Policies Map	<input type="text"/>
Site ID	337				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	x
(3) complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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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 development of this site is contrary to the Settlement Hierarchy Policy 1.16 which seeks to restrict development outside main settlement boundaries. The Policy map would indicate that the development is located outside the main settlement boundary.

The Sustainability Appraisal (SA) identifies east Coventry as not having good transport links and site 315 is categorised as being weak regarding accessibility and connectivity. Policy I 1B, i (Transport) seeks to locate development to mitigate the use of car travel. Given the sites weak connectivity car use will be encouraged, and development of the sites does meet this policy objective. In addition, under the Settlement Hierarchy S1.15, settlements should be directed to locations with good services. Given the poor connectivity identified in the SA, this site represents a poor choice for settlement expansion and does not fully implement agreed Rugby Borough Council development policy.

The rear access on to the single carriageway section of Heath Lane from site 315 is via a sunken road and no consideration has been given to this historical asset and its proposed destruction, contrary to policy D4 (Design) (Historical Environment) paragraph C and policy EN2 Landscape Protection.

While the plan refers to exploring and contributing to opportunities to enhance a safe pedestrian and cycle way on an existing bridle path between Brinklow and Brandon, it has not considered extending or providing new paths to connect strategic employment sites at Ansty and Ryton.

(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.

Any future development should take places within the current settlement boundary.

New pedestrian and cycle routes to connect to Strategic Employment sites should be considered as part of the overall development of Brinklow, to reduce reliance on car journeys and mitigate the impact on poor public transport connectivity.

(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.

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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 a true and accurate representation is made to the Appointed Planning Inspector concerning the development of site 337.

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.

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