

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"/>	<input type="text"/>
First Name	<input type="text" value="Amy"/>	<input type="text"/>
Last Name	<input type="text" value="Maycock"/>	<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="REDACTED"/>	<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="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<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?

Local Plan Paragraph	1.34	Local Plan Policy	Strategy S6 Residential allocations	Policies Map	Yes
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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.

Legal Compliance

Access and highway safety: The proposed development of site 129 would require access via Buckwell Lane and Manor Lane. Both are narrow, single-track country roads with no pavements and limited visibility at key junctions. The Local Plan must ensure that new allocations are “well served by existing infrastructure” (RBC Local Plan, Policy DSI), yet the plan does not provide evidence that these roads could safely accommodate the additional traffic generated by up to 60 dwellings.

Public transport and connectivity: Clifton has extremely limited public transport, with the Flexibus 9 service operating approximately once every 75 minutes, and not running after 6pm or on Sundays. The lack of alternatives means future residents will be heavily reliant on private vehicles, which fails the legal test of promoting sustainable transport.

Tree Preservation Orders (TPOs): Site 129 contains trees protected under TPOs. Any development must legally demonstrate avoidance, mitigation, or compensation. The plan

currently lacks clear measures to safeguard these trees or maintain ecological connectivity. Protected species: The site and surrounding hedgerows are likely to support bat populations and other protected species. The Wildlife and Countryside Act 1981 and the Habitats Regulations 1994 require assessment of impacts on such species prior to allocation. The Local Plan does not provide evidence that site 129 meets these legal requirements. High-quality agricultural land: Site 129 is classified as Grade 2 agricultural land, which is legally recognised as a finite resource under national planning policy. Allocating it for housing without exhausting alternatives could be viewed as non-compliant with Section 7 of the NPPF concerning land use and sustainable economic growth. Precedent: A 2017 planning refusal for a single dwelling on Manor Lane emphasised that even minor development could significantly harm the Conservation Area's setting.

Soundness

A positively prepared plan should seek to meet housing needs in a sustainable manner. Site 129 is remote from essential services such as GPs, secondary schools, nurseries, and shops. Residents would be highly car-dependent, contradicting the plan's own objectives to promote sustainable, accessible communities (Policies DSI, H1).

The evidence base does not justify allocating site 129. While the HELAA identifies the site as suitable for housing, it acknowledges the presence of TPOs and high-quality farmland. No evidence demonstrates how the environmental, ecological, and heritage impacts would be effectively mitigated.

Traffic assessments, drainage studies, and ecological surveys appear incomplete or absent. Without robust evidence, the allocation is not justified.

Effective planning requires that new allocations can be delivered without causing unacceptable harm. Site 129 would exacerbate congestion on Buckwell Lane, Manor Lane, Lilbourne Road, and Newton Road. Pedestrian and vehicular access is already constrained, and widening lanes would damage the village character. The plan is therefore not effective in ensuring safe, deliverable development.

3. Duty to Cooperate

The Duty to Cooperate requires constructive engagement with neighbouring authorities and prescribed bodies to address strategic matters. The allocation of site 129 does not demonstrate that cross-boundary issues, including transport pressures, ecological networks, and heritage impacts, have been addressed.

Strategic alternatives, such as focusing growth near Houlton, have not been fully considered through engagement, suggesting incomplete cooperation in the preparation of the plan.

Site 129 should be removed from the Local Plan. If removal is not feasible, any allocation must be heavily modified with stringent mitigation measures to address the issues above, as further detailed in my response to the next question.

(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. Primary Modification – Complete Removal of Site 129

Modification: Delete all references to site 129 in housing allocation tables, maps, HELAA entries, and supporting policies.

Justification:

Legal compliance: Removes conflicts with the Planning (Listed Buildings and Conservation Areas) Act 1990, Wildlife and Countryside Act 1981, and Habitats Regulations 1994. Addresses inadequate infrastructure and highway safety. Soundness: Directs development to sustainable locations, ensures evidence-based justification, avoids ecological and heritage harm, and aligns with national policy on high-quality farmland and Conservation Areas.

Suggested Text Revision:

“Site 129 in Clifton-upon-Dunsmore is not allocated for residential development due to constraints relating to infrastructure, ecological sensitivities, and heritage impacts. Development will be directed to sites with suitable access to services, sustainable transport links, and minimal impact on the character and environment of local settlements.”

2. Contingency Modification – Redevelopment with Mitigations

If site 129 cannot be fully removed, development must be strictly constrained and mitigated:

Scale: Limit to 20–30 dwellings, concentrated on the southern edge, away from TPOs, hedgerows, and public footpaths.

Highways & Transport: Require traffic modelling, passing places, pedestrian crossings, and high-frequency sustainable transport links.

Ecology & Environment: Conduct comprehensive ecological surveys; retain hedgerows and mature trees; establish wildlife corridors; implement pond protection and SuDS for drainage and flood prevention.

Heritage & Landscape: Maintain open vistas from Conservation Area viewpoints; restrict building heights and densities; preserve public rights of way and green buffers.

Suggested Policy Wording:

“Any development on site 129 must be limited in scale and carefully sited to avoid harm to ecological features, trees protected by TPOs, and the setting of the Clifton-upon-Dunsmore Conservation Area. Proposals must include ecological and heritage assessments, highway and transport mitigation, sustainable drainage, and retention of public rights of way. Development will only be permitted where these requirements are fully met.”

(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)?

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.

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:

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First Name	<input type="text" value="Amy"/>	<input type="text"/>
Last Name	<input type="text" value="Maycock"/>	<input type="text"/>
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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.

1. Legal Compliance

Infrastructure and accessibility:

Clifton has extremely limited amenities (no GP, dentist, secondary school, or nurseries) and infrequent public transport.

Future residents would be heavily reliant on private vehicles, conflicting with NPPF requirements to promote sustainable transport.

Road access via Newton Road would increase congestion and safety risks, particularly during school peak times.

Environmental and ecological obligations:

Site 202 is working agricultural land, supporting local farming and biodiversity.

Public Rights of Way cross the site and adjacent wetlands provide ecological corridors.

No evidence of pre-allocation ecological surveys or mitigation for protected species, contrary to the Wildlife and Countryside Act 1981 and Habitats Regulations 1994.

Heritage obligations:

The site is adjacent to Clifton Conservation Area. Development would harm its setting and rural character.

No robust evidence justifies allocation over more sustainable alternatives closer to existing services.

2. Soundness

Positively prepared: The site is isolated from essential services; allocation does not promote sustainable growth.

Justification: HELAA and Local Plan do not demonstrate that environmental, infrastructure, or heritage constraints can be mitigated.

Effectiveness: Without major interventions, development would exacerbate traffic congestion, threaten ecological features, and harm village character.

Policy consistency: Allocation conflicts with NPPF objectives on biodiversity, heritage protection, and protection of high-quality agricultural land.

Duty to Cooperate

The Duty to Cooperate requires constructive engagement with neighbouring authorities and prescribed bodies to address strategic matters. The allocation of site 202 does not demonstrate that cross-boundary issues, including transport pressures, ecological networks, and heritage impacts, have been addressed.

Strategic alternatives, such as focusing growth near Houlton, have not been fully considered through engagement, suggesting incomplete cooperation in the preparation of the plan.

Site 202 should be removed from the Local Plan. If removal is not feasible, any allocation must be heavily modified with stringent mitigation measures to address the issues above, as further detailed in my response to the next question.

(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.

1. Primary Modification – Remove Site 202

Modification Required:

Delete site 202 from the housing allocation schedule.

Remove the site from the Policies Map.

Delete all supporting text referencing its allocation.

Why This Is Necessary:

Legal compliance: Removes conflict with statutory duties to protect heritage assets (Conservation Area setting), biodiversity, and agricultural land.

Soundness: Avoids unsustainable car-dependent growth in a village with limited services and public transport.

Effectiveness: Prevents additional congestion and highway safety risks on Newton Road and through the village centre.

Policy consistency: Aligns the Plan with the NPPF objective of directing growth to sustainable, well-served locations.

Suggested Replacement Text:

“Site 202 (Newton Road, Clifton-upon-Dunsmore) is not allocated due to infrastructure constraints, ecological sensitivities, and potential harm to the setting of the Clifton Conservation Area. Housing growth will be directed to more sustainable locations with adequate services and transport links.”

2. Contingency Modification – Constrained and Mitigated Development

If removal is not accepted, allocation must be substantially modified:

Scale and Layout

Reduce capacity to a maximum of 25–30 dwellings.

Provide substantial landscape buffer to protect Conservation Area setting.

Highways and Transport

Require detailed transport modelling prior to allocation confirmation.

Deliver funded and certified mitigation (safe crossings, traffic calming, pedestrian links).

Ecology and Environment

Mandatory full ecological surveys prior to determination.

Demonstrate measurable biodiversity net gain.

Protect and enhance Public Rights of Way within green infrastructure.

Deliver sustainable drainage systems to prevent pond or surface water impacts.

Why This Is Necessary:

These safeguards are essential to ensure compliance with environmental legislation, highway safety requirements, and heritage protection duties, and to render the allocation justified, deliverable, and consistent with national policy.

(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)?

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:

I consider it necessary to participate in the examination hearing sessions because my representation raises substantive issues regarding the legal compliance and soundness of the Local Plan, particularly in relation to the allocation of sites 129 and 202 in Clifton-upon-Dunsmore. These matters involve detailed concerns about infrastructure capacity, highway safety, environmental protection, agricultural land loss, and impacts on the setting of the Conservation Area. Participation in the hearing sessions would allow me to respond directly to any questions from the Inspector, clarify technical and site-specific evidence, and ensure that the implications of the proposed allocations for local residents and statutory duties are fully understood. I therefore believe oral participation would assist the Inspector in reaching a properly informed conclusion.

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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