

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="Kamalgupt"/>	<input type="text"/>
Last Name	<input type="text" value="Mehta"/>	<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"/>
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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?

Local Plan Paragraph		Local Plan Policy	S7	Policies Map	Newton Manor Lane, Brownsover
Site ID	64				

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.

I strongly object to this allocation, particularly as the current Local Plan and the Coton Park East SPD Reference No. R20/0787 clearly set out this site as being for mixed residential and employment use. Indeed, an Outline Planning Permission already exists, and the developer has already done some works on site to keep the permission alive. I have no information on what evidence the developer/land owner has presented to Rugby Borough Council in seeking to get the allocation changed from mix use residential and employment to employment use only. But by my reasoning policy S7 allocation Site 64 for employment is unsound as it effectively removes an allocation for housing that has outline planning permission for 475 houses at a time when the Council has to contribute its share of the national requirement for 1.5 million homes by the end of the current parliament. It makes no sense to present a Local Plan with a negative on the housing numbers to start with. Furthermore, the Local Plan 2011-2031 Policy DS7 clearly states 'Employment development at this location should be provided to meet the qualitative demand for smaller units in the range of 5,000 - 50,000 sq.ft, in B1c, B2 and ancillary B8 employment uses'. The Sustainability Appraisal (SA) of the Rugby Borough Local Plan SA Report December 2025 at paragraph 5.2.32 states this site would likely deliver primarily B8 as opposed to a mix of employment uses (Coton Park East is proposed to deliver 4,000sqm of smaller units)'. If this were to happen then it is directly contrary to the

identified need for qualitative smaller units to meet the B1c, B2 and ancillary B8 employment uses. The change of use from a mix use site to a solely employment use is therefore considered unsound.. A wholly employment use for the site has off-site highway issues and impact on neighbouring areas. Whilst it may not be unsound in the strict definition of the word as defined in the National Planning and Policy Framework (NPPF) there are fundamental issues that must be satisfactorily addressed before planning permission can be granted and for the avoidance of future misunderstanding it is considered that these be clearly set down at the Local Plan stage. The site is to be served from the A426. This road is already subject to regular and severe congestion particularly at Junction 1 of the M6 and, further north, at the Gibbets Cross junction with the A5(T). Whilst the Parish Council does not have access to data that would demonstrate whether the additional traffic can be accommodated on the A426 it is suggested that evidence on the ground suggests that J1 is at, or near to, capacity and that Gibbet Cross is over capacity, with standing traffic on all approach routes. It may be argued that the number of traffic movements won't increase above those already permitted but 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. Whilst not a planning matter, reference should also be made to the poor state of highways in the locality caused by the number of 44-ton trucks. There are existing residential areas to the south and north east of the proposed site and the Five Arches Wildlife site and Great Central Walk runs along its eastern boundary. The proposed Design Code is intended to reduce impact but at the present time it has not been completed. The NPPF explains that developments must "add to the overall quality of the area" and references "attractive, good architecture, layout and landscaping" (P134) before issuing a clear instruction in P139 that "Development not well designed should be refused". In relation to a logistics development the NPPF has set a high bar that prospective developers will need to clear.

(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 site ends up as a logistics storage and warehousing development and given the constraints on its immediate boundaries and beyond, it is essential that parameters be defined now and not left to negotiation at planning application stage.

- 1.** A full assessment of the wider road network must be undertaken to assess whether there is sufficient capacity to accommodate the increased commercial traffic, particularly at J1 of the M6 and at the A426/A5(T) junction.
- 2.** The development should be subject to a Transport Plan
- 3.** The Parish Council strongly supports the Development Requirements, particularly the access arrangements to keep commercial traffic away from the existing school, the requirements for a Design Code (with particular reference to building heights and green buffers) and the need for particular sensitivity in the southern and north-eastern areas of the site. The Development Requirements should be embedded in any allocation.
- 4.** A Flood Risk Assessment should be undertaken before the allocation of further development is confirmed.

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

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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)

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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.

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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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	EN4	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

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The proposed Clifton Area of Separation is strongly supported. It is noted that the current northern end of that area (between the River Avon and Newton Manor Lane) lies within Newton and Biggin Parish and whilst the land is unlikely to be developed due to it being largely flood zone 3 the proposed designation will provide additional certainty.

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

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The Local Planning Authority's reason for proposing an Area of Separation for Clifton (also Dunchurch and Thurlaston) is given in para 5.8 of the Reg19 plan which reads:
 'The valued character and identities of the Borough's villages are, at least in part derived from the degree to which they are physically separated from the town'.

I agree with this statement which applies as much to Newton as it does to Clifton, Dunchurch and Thurlaston. As has been noted above Clifton area's northern boundary is Newton Manor Lane and affords no such protection to Newton. The Reg 19 proposes in site 59 a significant reduction of the area of separation between the town and Newton. It could be argued that the proposed St Thomas Cross Fields public open space provides the necessary protection but it is not yet confirmed and also does not extend to the West side of the village which is already subject to development pressure. It is therefore proposed that the Clifton area of separation be extended northwards as far as the Great Central Way and includes within it the St Thomas Cross fields.

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

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Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	S6	Policies Map	Newton Manor Lane, Brownsover
Site ID	59				

4. Do you consider the Local Plan:

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

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I have no information or evidence that the duty to co-operate has or has not been met.

There is substantial opposition to this proposed allocation from residents of Newton, Boughton Vale and Coton. The site is greenfield and represents an undesirable extension of built development into the rural area beyond the 'defensible boundary' of the Great Central Way. I am opposed to the allocation of Site 59 but have reluctantly concluded that in planning terms the site meets the requirements of being legally compliant and sound. However, it is considered that the development should only proceed in accordance with strict controls in an attempt to mitigate its impact (see 6 below)

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

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The potential developer has previously submitted a master plan to the Local Planning Authority which illustrates a development with some attractive features, particularly in relation to architectural treatment, open spaces, orchard and allotments. Whilst the LPA has subsequently increased the number of dwellings to be accommodated on the site there should be no further 'watering down' of the developer's original intentions.

The development requirements are strongly supported and should be an integral part of any confirmation of the allocation of the site. In particular the requirement that the adjacent St Thomas Cross fields be delivered as public Open Space is very strongly supported. This will provide much needed informal recreational area for the locality and wider area as well as environmental and ecological diversity, in part off-setting the ecological harm arising from the residential developments. The opportunity also exists to embed the new Public Open Space into the existing open space network through the provision of new public footpaths within the development and the strengthening of those outside. The development should not be allowed to proceed without a binding commitment to the delivery of the St Thomas Cross open space.

The development is to be served from Newton Manor Lane which is already restricted in width, horizontal and vertical alignment. Furthermore, at its Eastern end is the non-standard junction at St Thomas Cross. The development will inevitably add to traffic on the lane and junction and should not proceed without a full assessment of necessary improvements including infrastructure. Any bus-stop to be introduced on Newton Manor Lane should be off-line to avoid restricting traffic.

There have been flooding issues at various points on Newton Manor Lane which have worsened with the developments at Coton Park and in this respect the allocation of the site should not be confirmed until a full assessment has been made and any necessary mitigation agreed and included in the development requirements.

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

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