

## 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 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto: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)

*\*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="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Richard"/>	<input type="text" value="Ross"/>
Last Name	<input type="text" value="Foxon"/>	<input type="text" value="Middleton"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Newton LDP"/>	<input type="text" value="CC Town Planning"/>
Address Line 1	<input type="text" value=""/>	<input type="text" value="Thistledown Barn"/>
Line 2	<input type="text" value=""/>	<input type="text" value="Holcot Lane"/>
Line 3	<input type="text" value=""/>	<input type="text" value="Sywell"/>
Line 4	<input type="text" value=""/>	<input type="text" value="Northampton"/>
Post Code	<input type="text" value=""/>	<input type="text" value="NN6 0BG"/>
Telephone Number	<input type="text" value=""/>	<input type="text" value="01604346346"/>
E-mail Address	<input type="text" value=""/>	<input type="text" value="Ross.middleton@cctownplanning.co.uk"/>

(where relevant)

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

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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
Site ID	Policy S6 (87) Hillcrest Farm				

4. Do you consider the Local Plan:

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

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.

Our client considers the document to be legally compliant, sound and compliant with the DtC.

Additional supporting comments are provided within the attached correspondence dated 13<sup>th</sup> March 2026 (Ref: RM/WAR139).

(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.

It is urged that Policy S6 be modified to confirm that those 'Unit' figures for each allocated site are a 'minimum of' or 'about' figure to ensure that housing supply is boosted and that the maximum potential of each site can be realised.

Yet further, additional land is available at the Hillcrest Farm site which would provide an opportunity to 'round off' the settlement and ensure that the Council's ambitious targets can be met. This would require an amendment to the Inset Map for Newton to enlarge the existing allocation within Policy S6, which would also require an upward revision. Details of the suitability of the wider site is set out within both the attached and those representations deposited at Regulation 18 stage on behalf of Newton LDP.

This additional correspondence and technical evidence provides further justification for the Council's approach to the allocation of Hillcrest Farm, Newton within Policy S6 (Ref: 87) of the Regulation 19 document.

(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 provide points of clarity in respect of our client's land holding as allocated within emerging (draft) Policy S6.

**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.

N/A

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>

Your ref: RBC Local Plan Consultation  
Our ref: RM/WAR139  
Direct line: 01604 346346  
E-mail: ross.middleton@cctownplanningc.co.uk  
Date: 13<sup>th</sup> March 2026



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Rugby Borough Local Plan  
Regulation 19 Consultation  
Development Strategy Team  
Rugby Borough Council  
Town Hall  
Evreux Way  
Rugby  
Warwickshire  
CV21 2RR

Submitted via email to: [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk)

Dear Sir / Madam,

**Rugby Borough Council Local Plan (2024-45) Proposed Submission Consultation January-March 2026.**

**Publication of Local Plan for Consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).**

**RE: Hillcrest Farm and associated land at Newton Lane, Newton, Rugby, Warwickshire, CV23 0DZ.**

**Representations on behalf of Newton LDP (The Promoter) acting on behalf of the Landowner.**

We write on behalf of Newton LDP in response to the Rugby Borough Council Proposed Submission Local Plan (2024- 45) document which has now been published by Rugby Borough Council ('RBC') for public consultation under Regulation 19 of the above stated regulations.

Where relevant, comments are also provided in respect of the associated documents which have been published as part of the current consultation.

These representations are framed against the backdrop of our client's land interests at Hillcrest Farm (as referenced in emerging Policy S6), land to the west of Hillcrest Farm, and land at Newton Lane, Newton, Rugby.

The Regulation 19 document now confirms that RBC intend to categorise Newton as an Other Rural Settlement within emerging Policy S1, whereby development will be restricted. However, the document also allocates land at the settlement, namely Hillcrest Farm, for residential development purposes. An approach which clearly acknowledges the significant sustainability credentials of the village.

The focus herein is centred on the Hillcrest Farm allocation and the immediately adjacent land. It is however prudent to rehearse that our client has made historic representations in respect of their additional holdings to the east of Newton Lane, to the northeast of Hillcrest Farm.

For clarity, that holding (Ref: 76) remains immediately available and would lend itself to a range of development typologies and is sited in a prime location to play a complimentary role to ensure the longer-term success and sustainability of the strategic level of growth planned directly to the west at Coton Park East.

Cont...

It is not the purpose of this submission to rehearse points which have been previously raised by our client. Therefore, it is urged that this document be read in conjunction with those submissions deposited with the Council on 19<sup>th</sup> May 2025 (Ref: RM/WAR).

The primary purpose herein is twofold, to comment on the content of the plan and its evidence base and to confirm its compliance with planning law and whether it meets the tests of soundness, prior to its submission to the Secretary of State.

Our client has a significant interest in the plan's progression. Policy S6 (Site Ref: 87) of the consultation document allocates Hillcrest Farm, Newton for a residential development of 25 dwellings.

These representations are framed in support of the content of Policy S6 and against the backdrop of broad technical and feasibility works which have progressed, by our client, since May 2025. The initial conclusions of this ongoing technical work, prior to the submission of an outline planning application in H2 2026, provide confirmation that the site remains a sustainable, suitable, available development opportunity. A development opportunity which is viably capable of being delivered in accordance with both the requirements of Policy S6 and the wider suite of emerging policies.

Whilst this initial technical evidence is not in a condition to accompany these representations, their conclusions will be made available to the Council once concluded.

The conclusions will relate specifically to the draft allocation as delineated by Policy S6, however initial outputs suggest that the land directly abutting the west and

northern boundaries of the proposed allocation, share the same positive technical conclusions when assessed for residential development purposes.

Nonetheless, in respect of Policy S6, initial conclusions are clear that a residential development of the scale proposed through the policy can be technically achieved. The additional land is also available, as per previous representations, to assist the Council's efforts to boost housing delivery and achieve those ambitious housing delivery targets over the life of the plan.

Alongside focussed matters relating to Hillcrest Farm, our client has now undertaken a wholesale review of the Regulation 19 document and its corresponding evidence base.

At the outset, our client supports the approach to strategic housing growth across Borough and is buoyed to learn of the allocation of those strategic urban sites, allocations at the Main Rural Settlements and in particular the pragmatic approach to growth at the 'Other Rural Settlement' of Newton.

As stated previously, Newton does share certain characteristics with those 'Other' villages as listed within the hierarchy at draft Policy S1, with the key common feature being their size. However, by virtue of its proximity to the urban area of Rugby, which all but adjoins the entire western boundary of the settlement, the village is potentially a more sustainable location for growth than many of the Main Rural Settlements. As such, it is considered that the hierarchy, and its evidence base, should reflect this with a bespoke reference to Newton. This position has been discussed at length in our client's submissions of 19<sup>th</sup> May 2025.

The plan's strategy defines the requirement for 10,812 new homes during the period 2025–2042 (636 per annum). Hillcrest Farm will provide a significant contribution of 25 dwellings towards meeting this target in the early years of the plan. It is proven that this contribution could be increased to circa 50 dwellings, should additional land outside of the current allocation be included within the provisions of emerging Policy S6. The Council are signposted to those indicative masterplans submitted at Regulation 18 stage. They demonstrate how the wider site could feasibly be developed for a residential proposal of around 50 dwellings, potentially more, including a significant landscape buffer to the sites western edge to ensure separation is maintained from the urban area of Rugby, in perpetuity.

In regard to overall strategy, it remains our opinion that the interrelated and complimentary approach, through the allocation of a range of deliverable sites of differing scales, will ensure an effective and robust housing land supply is maintained during the period to 2042.

The Council's strategy will establish and maintain confidence of delivery across the plan period and provides a choice of sites to ensure that the 15-year growth trajectory, post adoption, can be realised. An increased proposal at Hillcrest Farm could serve to assist in this process.

As a key contributor of at least 25 net additional residential dwellings our client's principle request is that the Plan is submitted for examination with the allocations at Policy S6 intact. However, there are significant additional sustainability benefits from a social, economic and environmental standpoint to be realised, should the wider parcel of land at Hillcrest Farm be included within the allocation at Policy S6 and the corresponding delivery target revised upwards accordingly.

In acute response to Policy S6, the approach is effective, the allocation of our client's land is a deliverable solution and could potentially achieve housing delivery at a more ambitious rate than that which is anticipated in the Whole Plan Trajectory published with the consultation documents. However, at this stage it is reasonable to confirm that the Council's assumed delivery rate is accurate and one which could be exceeded.

The evidence which supports Policy S6 is clear and has informed a rational approach to the allocation of suitable sites for development. Aspects of the evidence base are touched on below; however, it is reasonable to conclude that the advantages of this site, in comparison to reasonable alternatives, are clear and the approach is discussed pragmatically within the wider suite of evidence base documents.

This pragmatism is also reflected in the content of Policy S6 itself which has been worded without unnecessary prescription, placing reliance on other detailed policies. This policy framework and interrelationship between policies is considered positive and will encourage the delivery of a well-designed scheme.

In reviewing the Council's updated Sustainability Appraisal (December 2025), the reasonable alternative development options have been considered. However, it is maintained that the sustainability credentials of a residential development proposal at Hillcrest Farm would be maximised if that additional land to the west and north of the proposed allocation were to also be included within the provisions of Policy S6. Our client yet further suggests that the evidence which supports Policy S6 is direct in its findings and there is a clear rationale for allocating Hillcrest Farm both in its current and expanded guises.

An expanded allocation could play a key role in the delivery of neighbourhood level social and community infrastructure. Contributions to relevant items could be harnessed through suitable provisions within an associated S106 agreement pursuant to any forthcoming planning consent. Yet further, an increase in CIL receipts would correspondingly return an increased 'meaningful amount' to Newton Parish Council to assist in their meeting of neighbourhood derived infrastructure requirements.

Such an approach to maximising delivery would align not just with national Government sentiment but also with the aims and objectives set out within the emerging plan. It must be made clear that any such future obligations will have to be based on the most up to date evidence at the time whilst being proportionate to the scale of any eventual consented development.

Hillcrest Farm's location, directly abutting and largely surrounded by existing built form is also a clear indication that the wider parcel of land shares the same credentials as the wider settlement. The enlarged parcel presents the next step in the growth of the village, and it is considered that the earlier allocation of a wider site could also bolster the vitality and viability of the wider settlement in the near term. This approach would be justified and would wholly align with the general sustainability thrust of both the NPPF and the emerging development plan.

Once again, our client does not seek any fundamental change to Policy S6, and it is considered that no modification is required to make the emerging plan legally compliant or sound. However, if modifications are to be carried out, our client would support a proposed amendment which increases the size of the proposed allocation to take in the entire 2.5ha holding to the west of Newton Lane. Any such amendment should be reflected in an upward revision to the delivery figure from

this site to be 'around 50 units' or 'a minimum of 50 units'. Such a positive amendment would assist in boosting housing delivery, as required by the NPPF.

If no modification is to be made to the site area or quantum, it is urged that Policy S6 be amended from its current form to ensure that is sufficiently flexible to enable deviation from the 25-unit cap which is currently quoted. This approach would maximise the development potential of this important site.

It is also urged that the treatment of the site, on the Council's emerging proposals map, be carefully considered. Regardless of the extent of the eventual allocated site, it is considered that there is logic in appropriately amending the village boundary to encapsulate the extent of the allocated site. The alternative is that the development, once delivered, will sit outside of the village envelope until a new plan is prepared and adopted.

In terms of the content of the Annex within the consultation document, and its guiding principles relating to the development the site, this is noted. To confirm, any future outline or full planning application prepared by our client will seek to provide a built frontage on to Newton Lane, maintain and upgrade the referenced existing rights of way within the site and ensure connectivity to the settlement. In terms of vehicular access, whilst there are considerable opportunities for access on to Newton Lane, the guiding principles should not discount the use of the existing access arrangements from The Hollies which would maximise permeability. Dual access also provides justification for the allocation of a wider 2.5ha parcel of land.

Those detailed policies contained within the consultation document have also been fully considered. It is urged that the Council reserve the right to amend Policy EN5:

Biodiversity Net Gain, and its supporting text, to reflect anticipated legislative changes.

In regard to the content of Policy H1: Housing Mix, it is urged that this policy be flexibly reworded to allow for the utilisation of the most up to date evidence to inform housing mix. Similarly, the table at 6.1 could be removed as it presents a snapshot in time that could even be out of date at the point the plan is adopted.

In respect of the Council's evidence base, our client has carried out a wholesale review and there are no comments on large swathes of the proposed submission package.

To confirm, and to provide comfort, the land which is proposed to be allocated at Hillcrest Farm remains immediately available and under the control of a single landowner who has an appetite to develop the site in the near term. Initial findings also confirm that it is free of technical constraints.

Whilst the outcome of the assessment for the allocated land is clear. The assessment for the wider allocation (Ref 87) suggest that an increased allocation is only 'potentially suitable'. The landowner has considered the conclusions, and initial testing suggests that the Ashlawn Cutting Local Nature Reserve, Local Wildlife Site, SSSI and priority habitats in proximity to the site would not be impacted by a widened allocation. Any potential impacts would be identified and could be sensitively mitigated through the planning application process.

In any eventual policy approach for the Hillcrest Farm site, the land will provide an opportunity to realise a comprehensive approach to residential growth at Newton and provide a suitable opportunity to 'round off' the settlement. The delivery of a

minimum of 25 units from the site would play a key role in meeting those sustainable objectives which the emerging development plan and an increased level of development could exceed the ambitions which the plan seeks to set.

Considering the above, our client's stance is that the emerging development plan document is both soundly justified and legally compliant, in its current form.

Finally, Officers are to be commended for reaching Regulation 19 stage on review the document is deemed to be legally compliant, sound and compliant with the duty to co-operate.

On behalf of our client, we would appreciate being kept abreast of the plan's progress. We would be interested in participating in the hearing sessions, once the Inspector has identified those matters and issues for examination, either through the submission of written statement(s) or appearance at the examination.

Should you require any additional information or wish to discuss any of those points raised above then please do not hesitate to contact us via those channels listed above.

Yours sincerely,

**Ross Middleton BA(Hons) MA MRTPI**  
Associate