

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" value="Mr"/> | <input type="text"/> |
| First Name | <input type="text" value="Mark"/> | <input type="text"/> |
| Last Name | <input type="text" value="O'Connell"/> | <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"/> |
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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 | <input type="text"/> | Local Plan Policy | <input type="text"/> | Policies Map | <input type="text"/> |
|----------------------|----------------------|-------------------|----------------------|--------------|----------------------|

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

| |
|-----|
| Yes |
|-----|

(2) is Sound

| |
|-----|
| Yes |
|-----|

(3) complies with the Duty to co-operate

| |
|-----|
| Yes |
|-----|

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 have very strong reservations about this allocation, particularly in relation to 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). 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”. Great Central walk should remain a rural walk and all buildings masked from view in all seasons by a significant natural buffer as part of this plan,

Great Central walk is also being encroached upon from the other side by Sites 87 and 59.

I understand that the "Provision of at least 0.75ha of land immediately adjacent to Rugby Free Primary School to provide school playing fields/sports facilities and a forest school." may come with unrealistic conditions, such as the school purchasing or renting the land.

Whilst I welcome the mix of smaller units alongside larger units, the majority of this employment is likely to result in low paid and unskilled labour, for example warehousing. Low incomes put a strain on resources in the area such as health and social care and education. They are also contributing to the low output decline of the country as a whole. Rugby is becoming a commuter town for skilled workers, with good transport networks but not retaining a skilled workforce itself. This is also contradictory to H8, which aims to disperse HMOs. The provision of more low wage employment will simply increase the demand for HMOs and affordable housing.

(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 a logistics site is to be successfully integrated into the area, 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. I strongly support 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. Residents in the Boughton Vale area report increased flooding following existing Coton East developments. Whilst I do not have evidence to support this a Flood Risk Assessment should be undertaken before the allocation of further development is confirmed.

The provision of land for school use should be unconditional and affordable.

Great Central walk should remain a rural walk and all buildings masked from view in all seasons by a significant natural buffer as part of this plan. As mentioned above, building heights must also be a consideration to achieve this.

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

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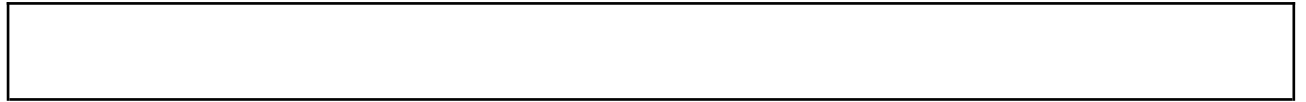
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Part B - Please use a separate sheet for each representation

Name or Organisation:

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

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Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

(2) is Sound

Yes

(3) complies with the
Duty to co-operate

Yes

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.

This site is greenfield and represents an undesirable extension of built development into the rural area beyond the 'defensible boundary' of the Great Central Way. However, I have reluctantly concluded that in planning terms the site meets the requirements of being legally compliant and sound. Additionally, I have no evidence that the duty to co-operate has not been met. However, it is considered that the development should only proceed in accordance with strict controls in an attempt to mitigate its impact.

(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. There should be no watering down of these features.

The adjacent open space at St Thomas Cross fields is strongly supported. However, in order to maintain the boundary at Great Central Way, I strongly suggest that the dwelling site and open space site be reversed. Thus giving access to existing Coton/Boughton and new residents to the open space.

Similarly, it should be considered that existing local residents will be given equal priority to facilities such as allotments compared to residents of the new dwellings.

Footpaths and cycle paths should be improved, especially to allow safe access to employment sites. 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.

A natural buffer must be enforced at Great Central Way in order to entirely mask buildings and maintain the rural walk. Especially as a number of other sites are also encroaching on this important space, which is essential for the wellbeing of local residents and an important area for wildlife.

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. Any bus-stop to be introduced on Newton Manor Lane should be off-line to avoid restricting traffic.

A full flood assessment is required due to local concerns and any necessary mitigations made.

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

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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

Local
Plan
Policy

Policies
Map

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

(2) is Sound

Yes

(3) complies with the
Duty to co-operate

Yes

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Site is largely covered with former agricultural buildings more recently used for accommodating horses and related activities. It is considered to be a brownfield site adjacent to the village and as such no objection is raised to the principle of its development.

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

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I would like to draw attention to the long-established substantial hedgerow and tress along the Newton Lane frontage. Whist the suggested footpath to this frontage is supported it should be made a development requirement that this hedgerow and trees be retained, protected and strengthened and that any footpath should be on its development side to ensure its retention and also in the interests of visual amenity and ecology.

In order to avoid any further visual impact to Great Central Walk, especially given the other sites encroaching on this walk, planting around the site should mask the new buildings and maintain the rural aspect across from Great Central Walk towards Newton.

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

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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 | <input type="text"/> | Local Plan Policy | Infrastructure I2 Parking | Policies Map | <input type="text"/> |
|----------------------|----------------------|-------------------|---------------------------|--------------|----------------------|

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

| |
|-----|
| Yes |
| No |
| Yes |

(2) is Sound

(3) complies with the Duty to co-operate

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.

There is extensive evidence across Rugby that parking is an issue. In areas where public transport and cycle paths have been improved, this has made little difference to the parking issues. In new housing developments, this is exacerbated by insufficient parking spaces for smaller dwellings, e.g. flats, and garages being used solely as storage, even if they meet the minimum size requirements. Coton Park, where development only completed in recent months, can be considered evidence of this and the residents association have been trying to resolve matters retrospectively but opportunities to do so are very limited. There is no evidence to suggest that reducing parking spaces or improving alternative transportation significantly impacts the demand for parking. Even those who commute by bike or public transport will usually have car.

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Garages should not be taken into account in the parking allocation. Where possible, through planning, garages should be discouraged and smaller storage facilities encouraged, giving more space for parking, whilst accepting that residents do require a place to store various items.

Underground parking should be considered. Taking other European countries as an example, this works very well. Communal underground parking is the norm in some countries, Germany for example. This can be located under the properties, including residential settings - not just flats but also individual homes.

Even 1 bedroom flats often have a couple occupying them, each with a car. The allocation for any property, irrespective of bedrooms, should have a provision for 2 cars to be parked.

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Whilst I consider the plan compliant, it unfortunately only addresses the needs of future development and almost entirely fails to recognise the existence of existing residents and business, with poor access to public transport and cycle/footpaths.

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New developments, especially those of considerable size, must also contribute to the wider community and improve existing facilities for their neighbours. Otherwise, we will just have a cycle of residents and businesses migrating towards new areas and have a further decline of existing ones.

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

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

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**Name of the Local Plan to which
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Part A

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| | | |
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| E-mail Address (where relevant) | <input type="text"/> | <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 | <input type="text"/> | Local Plan Policy | Wellbeing W2 Open space and sports provision | Policies Map | <input type="text"/> |
|----------------------|----------------------|-------------------|--|--------------|----------------------|

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

(2) is Sound

Yes

(3) complies with the Duty to co-operate

Yes

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.

Whilst I accept that the plan is compliant and sound for new developments, it fails to address the deficit in existing spaces and also the impact to existing spaces new developments will have to wellbeing.

Taking an example from page 88 of this plan. Coton and Boughton currently has a provision for allotments currently of 0.1 and a deficit of 0.55. There is nothing in this plan that would remove the significant deficit. The plan would just ensure, theoretically, that new dwellings would have the prescribed quantity of allotments. The nearest allotments to Coton and Boughton are, I believe at Eden Park. However, Coton and Boughton residents do not get the same priority to these as Eden Park residents do. So a precedent is already set that existing residents are not being considered when new developments are built in adjoining areas.

Various new employment and residential sites are being developed directly adjacent to spaces that are important for the well being of existing residents. For example 3 sites adjacent or very close to Great Central Way, including one very large employment site.

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

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New facilities in new developments must allow equal access and priority to existing residents in neighbouring areas. This must include a responsibility for those sites to remove existing deficits. Where there is a surplus, they could also benefit from not having to make further provisions and therefore increasing the surplus. Alternatively, new developments must support their neighbours by funding projects to remove such deficits.

Spaces, such as Great Central Way, must be protected during development and once the development is complete. Urbanisation of green spaces must not be permitted and natural barriers to any buildings must be created. This is essential to the well being of residents.

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

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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 | <input type="text"/> | Local Plan Policy | Strategy S2 Strategy for homes | Policies Map | <input type="text"/> |
|----------------------|----------------------|-------------------|--------------------------------|--------------|----------------------|

Site ID

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(1) is Legally compliant

Yes

(2) is Sound

Yes

(3) complies with the
Duty to co-operate

Yes

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Whilst I consider the plan to be compliant and sound and also welcome the opportunities at two sites for self-build and independent plots, it is not clear why this is only available at 2 sites or the size of the allocation with respect to the overall number of plots.

(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.

All sites over a certain size must offer plots for self building or small independent builders. This supports our local economy and brings diversity in architecture to the area. Self builds are often to a higher standard, for example achieving higher environmental credentials.

The number of plots allocated to self building / independent building must be stated in the plan and enforced.

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

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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 | <input type="text"/> | Local Plan Policy | Strategy S8 South West Rugby | Policies Map | <input type="text"/> |
|----------------------|----------------------|-------------------|------------------------------|--------------|----------------------|

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

| |
|-----|
| Yes |
|-----|

(2) is Sound

| |
|----|
| No |
|----|

(3) complies with the Duty to co-operate

| |
|-----|
| Yes |
|-----|

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 plan states "Physical and visual separation from the Dunchurch settlement boundary shall be maintained by a significant green buffer to prevent coalescence.". It is clear from the "South West Rugby Masterplan Supplementary Planning Document" that there is no significant area of separation. Every field and green space between Bilton/Cawston and Dunchurch is accounted for in that plan. It is not clear what constitutes a green buffer but I cannot see anything highlighted on the plan to indicate an area significant enough to maintain Dunchurch as an independent village.

(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.

A rural area must be maintained around Dunchurch in order to prevent it becoming a suburb of Rugby town. The existing allocation of land for development must be reduced in order for this separation to be maintained.

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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 | <input type="text"/> | Local Plan Policy | Climate CL1 Net zero buildings | Policies Map | <input type="text"/> |
|----------------------|----------------------|-------------------|--------------------------------|--------------|----------------------|

Site ID

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(1) is Legally compliant

Yes

(2) is Sound

Yes

(3) complies with the Duty to co-operate

Yes

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Whilst I accept the plan is compliant and sound, it only appears to cover the bear minimum and misses the opportunity for Rugby to set an example where standards exceed the current minimum and set us up for the future.

There are a number of statements which are ambiguous and may allow loop holes to be exploited. An example being "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". Who will define what is practicable?

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

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Passivhaus standards should be mandatory for all new builds. These are no longer expensive or difficult to achieve when building from the ground up but incredibly difficult and costly to retrofit, unlike solar panels or heat pumps.

Open and unmeasurable statements which can be exploited must be reworded and clarified to remove all aspects of ambiguity.

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

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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 | <input type="text"/> | Local Plan Policy | Environment EN7 Flood risk | Policies Map | <input type="text"/> |
|----------------------|----------------------|-------------------|----------------------------|--------------|----------------------|

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

(2) is Sound

Yes

(3) complies with the
Duty to co-operate

Yes

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Whilst I welcome the provision for flood prevention and believe it is sound and compliant, there is evidence with recent developments at Coton Park that sufficient and functioning drainage has not been implemented. Ground to the edge of the Persimmon site in Coton Park is saturated with standing water.

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

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There needs to be stronger wording of enforcement within the plan to ensure that drainage is not missed or becomes an after thought, leading to residents and neighbours being affected for years after developments are complete.

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

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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)

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| | | |
|------------------------------------|--|----------------------|
| Title | <input type="text" value="Mr"/> | <input type="text"/> |
| First Name | <input type="text" value="Mark"/> | <input type="text"/> |
| Last Name | <input type="text" value="O'Connell"/> | <input type="text"/> |
| Job Title (where relevant) | <input type="text"/> | <input type="text"/> |
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| Telephone Number | <input type="text"/> | <input type="text"/> |
| E-mail Address (where relevant) | <input type="text"/> | <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 | <input type="text"/> | Local Plan Policy | Economy E2 Employment development | Policies Map | <input type="text"/> |
|----------------------|----------------------|-------------------|-----------------------------------|--------------|----------------------|

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

| |
|-----|
| Yes |
|-----|

(2) is Sound

| |
|-----|
| Yes |
|-----|

(3) complies with the Duty to co-operate

| |
|-----|
| Yes |
|-----|

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.

Whilst I welcome the inclusion for the delivery of units for small and medium sized businesses within the plan, we are seeing that the vast majority of so called Employment development is for low wage, low skilled employment such as warehousing. This does not support the economic output of the country and puts a strain on local resources such as health and social care, education and housing. It is also contradictory to H8 in regards to the demand on HMOs.

The development of large warehouse sheds on or near residential housing or rural areas, such as near Great Central Way, could actually be replaced with smaller buildings that offer higher paid and more skilled jobs. This would keep skilled workers living in Rugby also working in Rugby rather than Rugby becoming entirely a commuter town for such skilled workers. This would also boost the local as well as national economy.

(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 expect for a limit to be set on the volume of low skilled/low income employment development and further clarification of the higher skilled/higher wage expectations for the employment required.

I expect prioritisation of lower/smaller employment developments in rural and residential areas. Where this is not possible, significant natural buffers must be created to protect the visual aspects of these areas.

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

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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 | <input type="text"/> | Local Plan Policy | Environment EN4 Areas of Separation | Policies Map | <input type="text"/> |
|----------------------|----------------------|-------------------|-------------------------------------|--------------|----------------------|

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

(2) is Sound

No

(3) complies with the Duty to co-operate

Yes

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 plan is not sound because it is clear from the plan that all fields will be filled in with development between Bilton/Cawston and Dunchurch. Any area of separation must be so insignificant that it is not even visible on the plan. Dunchurch will clearly become another suburb of Rugby town on the current plan. For example, a line of trees, a road or path does not constitute a sufficient area of separation.

(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.

A larger area of separation must be included in the plan so that there is a visible area of green land between Rugby town/suburbs and Dunchurch . Dunchurch must remain an independent village. It must be very clear what this area of separation is.

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

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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 | <input type="text"/> | Local Plan Policy | Housing H1 Housing mix | Policies Map | <input type="text"/> |
|----------------------|----------------------|-------------------|------------------------|--------------|----------------------|

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

(2) is Sound

No

(3) complies with the Duty to co-operate

Yes

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.

Given the emphasis in this plan on creating large employment sites with mainly low paid workers, the mix of affordable housing will be wholly insufficient. It is also counter to H8 with regards to HMOs because the unavailability of affordable housing will increase the use of HMOs in the area.

(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 we are to continue to build, as part of this plan, more large shed warehouses and similar employment sites then we need to increase the volume of affordable housing significantly.

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

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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 | <input type="text"/> | Local Plan Policy | Housing H8 Houses in multiple occupation | Policies Map | <input type="text"/> |
|----------------------|----------------------|-------------------|--|--------------|----------------------|

Site ID

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Yes

(2) is Sound

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I welcome this plan and believe it to be sound and compliant. However, with the volume of low skilled/low wage employment to be encouraged and introduced as part of this plan, it is simply unfeasible for it to be implemented unless alternatives are provided. The level of affordable housing to be developed under this plan and the current unavailability of affordable housing in the area, will lead to more HMOs being required and thus the density of these increasing.

(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.

In order to implement H8, the percentages of affordable housing in H1 need to be reviewed (increased) and there needs to be a cap on the development of sites for low skilled/low wage work as part of the Economic aspects of this plan.

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

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