

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

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Leona"/>	<input type="text"/>
Last Name	<input type="text" value="Bendall"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<input type="text"/>
Line 3	<input type="text" value=""/>	<input type="text"/>
Line 4	<input type="text" value=""/>	<input type="text"/>
Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value=""/>	<input type="text"/>

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

Name or Organisation:

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

Various points of the Plan – all of which are identified next to our comments

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes Pailton Parish Council considers Local Plan prepared by Rugby Borough Council to be Legally Compliant

(2) is Sound

Yes Pailton Parish Council (PPC) considers many aspects of the Rugby Local Plan to be Sound ... but this is not just a yes or no situation. See point 5 below

(3) complies with the Duty to co-operate

Yes PPC would support the position that Rugby Local Plan complies with the Duty to co-operate. Within the evidence there are multiple examples of co-operation with local authorities, national bodies and other authorities whose work provides good examples of emerging best practice. Notably the reference to Cornwall County Council cited in paragraph CL 2.4.

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.

COMMENT ON 'SOUND'

There are aspects that are unquestionably sound but there are areas of the plan that we consider do not meet the definition of 'Sound' in planning terms and we discuss this further under paragraph 1.5, and site proposals for ID 315 and 337 in Brinklow.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No	<p>No, no representative from Pailton Parish Council wishes to participate in hearing session(s)</p>
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Other Comments from Pailton Parish Council

Strategy	
1.5	<p>The main contention by Rugby Borough Council of the inclusion of so much housing in rural village sites is that it is ‘will provide the greatest range of rural services and new housing will support village sustainability’.</p> <p>This PPC does not think is sound.</p> <p>The reality is that transport links range from sparse to non-existent between these villages, Rugby town and its transport connections.</p> <p>The residents of these homes will be totally dependent on having a car – so they are in no way sustainable. Nor are there existing home to school links that would be capable of expansion to meet the demand for school children to reach primary and in particular secondary schools. Warwickshire County Council is currently spending £50m a year on home to school transport as so many of the communities in Rugby Borough are unsustainable – and there is no extra funding to meet any additional costs.</p> <p>There is certainly an element of reality in that ‘some’ new housing would help sustain rural communities but the scale imposed on some communities would not sustain, but rather submerge existing social infrastructure and community cohesion. Discussed further as part of the housing allocations for Brinklow – ID 315 and 337</p>

S8	<p>South West Rugby</p> <p>PPC does not believe or accept that the proposals for the housing, employment and transport links are deliverable in the timescale suggested. The vitality of the housing market's growth in the whole Rugby borough has fallen significantly over the past few years.</p> <p>This has impacted upon the growth in council tax revenues which will affect the delivery of services and therefore the attractiveness of Rugby Borough as a destination for housing, inward investment and employment.</p>
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CL.1 2.4	Climate Overall the detailed commitment and technical specifications are admirable and if utilised by planning officers and endorsed by the political Planning Committee could make a significant impact on the move to Net Zero in the Borough. The reference to use of Cornwall's tools will assist officers and developers to deliver this commitment .
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Centres	<p>Rugby Town Centre</p> <p>We thoroughly endorse all of the points made in this section – the revitalisation of Rugby Town Centre is too long overdue and a real disincentive for inward investment. As a rural village (not identified for growth) our residents will welcome the enhancement of this public realm.</p> <p>While not part of this submission the plan for Rugby Town Centre considered by Council on the 18 March is very thorough indeed and if implement will achieve the Borough Council’s objectives</p> <p>Neighbourhood Centres</p> <p>We likewise support the initiatives laid out here.</p>
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<p>Environment</p> <p>EN 1 – EN3</p> <p>5.7</p>	<p>Pailton PC supports all of the improvements identified here ...</p> <p>but we particularly support the designation of Rainsbrook Valley as a landscape of elevated sensitivity. Approaching Rugby from the South on the A45, the impact of the Rainsbrook Valley is impressive and creates a welcoming sense of place.</p> <p>This is totally unlike the entry to the town from the South via the Leicester Road, with its plethora of identikit retail sheds in the out of town shopping centres. From here the entrance to the town centre is under an old railway bridge, alongside derelict former industrial sites, and then one has to drive alongside unattractive and often neglected housing.</p>
<p>EN 4</p>	<p>Areas of Separation</p> <p>PPC fully supports this and hope the decision to maintain these areas of separation is upheld.</p>
<p>EN6</p> <p>5.16</p>	<p>Canopy Cover</p> <p>PPC fully supports Rugby’s intention to increase significantly its tree canopies but the devil will be in how this is installed, monitored and maintained.</p> <p>This point on maintenance is critical and must be a mandatory condition on developers and communities that Rugby enforces.</p>
<p>EN 7</p>	<p>Flood risk</p> <p>The sentiments expressed are admirable but the reality is that so much of the proposed new housing is on land susceptible to flooding.</p> <p>When considering applications from developers (commercial and housing) – these policy statements much be upheld and enforced by both Planning Officers and the Planning Committee.</p>
<p>EN8</p>	<p>Environmental Protection</p> <p>Again the ‘words’ are very good – but it will be essential that communities see and are reassured by the steps taken by officers to ensure this Protection goes beyond mere words.</p>

Housing H1	Once again the stated intentions are admirable, but with a falling or at best static housing market, will Planning Officers be able to insist on the specified mix of properties, rather than big box houses which make more money for developers.
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W1	Protection of Community Facilities We fully support the intentions and commitment of this policy area.
B 7.2	We are pleased to see the inclusion of so many of the Borough's facilities and in particular the emphasis on motor sports in Brandon – this truly is part of the area's cultural and industrial heritage.

D1	<p>Well-designed Spaces</p> <p>This policy and its commitments is much needed as generally in the past 30 years, apart from very expensive homes that few can afford, developers, with the consent of planning officers, have foisted bland lookalike boxes on powerless communities.</p> <p>PPC refer further to this as part of our comment on Brinklow – side IDs 315 and 337.</p>
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<p>I1</p> <p>9.1 & 9.2</p>	<p>Infrastructure Transport</p> <p>This is little more than nice words. RBC has no influence on the bodies that provide public transport and no track record of delivering this.</p> <p>The authorities inclusion of unconnected rural housing sites, for example Brinklow, makes a mockery of this ‘commitment’.</p>
<p>I4</p>	<p>Infrastructure – Planning Obligations</p> <p>The commitment in this section is entirely admirable and must be supportive ... but as with so much in this Local Plan – great intentions will fail because of lack of resources, particularly qualified staff (legal and planning) to deliver on these proposals in a timely fashion. Particularly the requirements of paragraph B and C on retrospective payments.</p>

Annex	
Site Id 315	<p data-bbox="416 230 1086 266">Brinklow, South of Rugby Road circa 250 homes</p> <p data-bbox="416 309 1374 488">While the Planners have identified some welcome provision for self-build and custom build homes, these could quite realistically be provided within the site of West Farm and Home Farm. The concern of the Pailton Parish Council is that the bulk of this very large site will in all likelihood become just another ‘modern housing blob’ as exists all over England.</p> <p data-bbox="416 530 1382 669">While there is mention of the need for a developer to ‘explore and enhance local historic landscape characteristics – such as ‘planting and orchard’ – in reality the viability of financing a development of over 200 homes will curtail imaginative design.</p> <p data-bbox="416 712 1378 851">Pailton Parish Council is also very concerned that rather than foster the organic growth of Brinklow as a local centre, at circa 250 homes, the scale will swamp the village and work against the strengthening of community cohesion.</p> <p data-bbox="416 860 1382 999">But we readily acknowledge that Brinklow would benefit from more housing to strengthen and sustain the existing village businesses that are struggling, and all of whom have been campaigning for more local support or they will fail.</p> <p data-bbox="416 1041 1326 1180">A limit of around 100 homes, along with site 337, will be more than sufficient to foster organic growth and may at this scale encourage a developer to reflect local design features into their buildings. It is the difference between specialist design and bulk or mass provision.</p>
Site Id - 337	<p data-bbox="416 1223 1023 1258">Residential allocations – Brinklow 75 homes</p> <p data-bbox="416 1301 1350 1440">PPC is aware of the local hostility to (it seems) any development in Brinklow. However for Site 337 and its emphasis on ‘retain, restore and re-purpose the historic agricultural holdings, PPC feels this should be strongly supported.</p> <p data-bbox="416 1482 1358 1588">This will enhance this corner of the village, which can be said to already have strong connections to the Broad Street centre and a specific existing pedestrian link is identified.</p> <p data-bbox="416 1630 1366 1736">However, the Plan states that the capacity of this site for 75 homes has been identified as an area where the focus (but not exclusively) will be on homes for over 55s is not realistic.</p> <p data-bbox="416 1778 1362 1883">Yes specific accommodation for over 55s should be part of the mix of homes, but the over reliance on just one element of the market is likely to make the whole site unviable to a developer.</p> <p data-bbox="416 1926 1326 2024">PPC is also of the view that the historic landscape (ridge and farrow, disused canal embankment and Brinklow Castle) should have stronger protection.</p>

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End of comments from Pailton Parish Council