

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" value="Mr"/>
First Name	<input type="text" value="Gregg"/>	<input type="text" value="Robert"/>
Last Name	<input type="text" value="Titley"/>	<input type="text" value="Barnes"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Panattoni / AC Lloyd"/>	<input type="text" value="Planning Prospects Ltd"/>
Address Line 1	<input type="text"/>	<input type="text" value="Unit 4 Mill Pool"/>
Line 2	<input type="text"/>	<input type="text" value="Nash Lane"/>
Line 3	<input type="text"/>	<input type="text" value="Belbroughton"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="DY9 9AF"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="robert.barnes@planningprospects.co.uk"/>

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	Table on page 7	Local Plan Policy		Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	
(2) is Sound	Yes		No	X
(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.

The provision of homes is guided by Strategic Policy S2, but that policy is not identified against that Strategic Priority. The provision of employment is guided by Strategic Policy S3, but that policy is not identified against that Strategic Priority.

(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.

Amend the table on page 7 correctly to reflect the policies to which the Strategic Priorities relate.

(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:

Panattoni / AC Lloyd are promoting one of the proposed major employment allocations in the Plan. Some of their representations are detailed and concerned with site specifics which may require further explanation in person.

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:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>

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	S3	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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 comments provided here relate, first, in broad terms to the provisions of Policy S3 insofar as they contend with the amount of employment floorspace to be identified. Policy S3 also identifies the distribution of locations where new allocations are to be made to meet this requirement, and the comments provided here, second, address that point as well.

The new allocations are further dealt with by Policy S7. Additional comments are made separately in relation to that policy concerning detailed matters around the allocations and raising questions about soundness.

In relation to the first element of Policy S3 (amount of employment floorspace), AC Lloyd and Panattoni consider in the round that it is positively prepared, providing a strategy which seeks to meet Rugby's employment land needs and is informed by working with other authorities.

There are elements of conservatism in the evidence base. For example, the Topic Paper: Development Needs (December 2025) notes that the need for industrial land on smaller sites is based on past trends and so may be planning constrained rather than reflective of actual need. For large sites it accounts for an additional requirement for 50ha drawing from updated evidence in the November 2025 Addendum to the Coventry and Warwickshire Alignment Paper, but that updated evidence in fact identifies a need for "at least" this additional requirement within the Coventry – Rugby corridor, noting the highest market ranking assigned to this area. Moreover the identified supply including draft allocations is effectively only equivalent to the requirement including some allowance for Coventry's (exported)

need, and reliance is placed on a single site (Walsgrave Hill) for over half of the total allocated floorspace, indicating limited flexibility if the requirement is to be met.

To some degree, then, the evidence points towards a greater requirement than is identified in the emerging Plan; it certainly does not suggest the identified requirement is too high. However, the Topic Paper: Development Needs fairly observes that the proposed allocation of employment land reflects a step change in delivery of employment land compared to the current local plan. It also identifies a range of factors which together suggest that the identified supply will be robust and far reaching. Part of the consideration rightly set out there in support of the Council's approach is the control of Coton Park East by developers with a strong track record of delivery. The November 2025 Addendum to the Coventry and Warwickshire Alignment Paper acknowledges that other approaches to modelling might be applied, but they are not required; in any event, the outcome of any modelling exercise must be understood for what it is (professionally prepared analysis based on a series of assumptions to yield a range of estimates), rather than treated as an exact science.

In this context, and cautiously, AC Lloyd and Panattoni consider that at a minimum the allocations meet Rugby's employment land needs. To maintain choice and variety in the supply, though, and support delivery, a range of sites including in particular land at Coton Park East must be retained as allocations.

In relation to the second element of Policy S3 (distribution of employment floorspace), AC Lloyd and Panattoni consider that it is justified, representing an appropriate strategy taking into account reasonable alternatives, and based on proportionate evidence.

The evidence base (Topic Paper: Development Needs, December 2025) notes that most (68%) of new employment floorspace allocated through the Regulation 19 document is on the edge of Coventry, rather than Rugby town. AC Lloyd and Panattoni are strongly supportive of the identification in Policy S3 of Coton Park East (Site 64) for employment development, and are actively promoting that site for development. It is located on the edge of Rugby, well related to the rest of the urban area and the town's workforce. To ensure an effective distribution of employment land, and make certain that local jobs are provided for local people in Rugby, it is critical that land is allocated there. As such, Coton Park East should be recognised as an essential element of the employment land strategy, ensuring that adequate provision is made at Rugby, balancing the concentration on the edge of Coventry.

The Coton Park East allocation is not just important in terms of its location (at Rugby, rather than Coventry) but also its size (being strategic, according to the WMSESS criteria) and character (capable of and indeed required to accommodate small units as well as larger ones). This, along with the status and commitment of those promoting it to develop it at the earliest opportunity, further underpins its status as an essential element of the planned for supply.

Moreover, again, the Coventry – Rugby corridor is identified in the WMSESS as having the highest market ranking, and subsequent corrections to the WMSESS identified a substantial additional strategic requirement there. This corridor ("Area 7") can effectively be understood as the central swathe of Rugby Borough, including Rugby town. It also includes Coventry, but the Coventry City area is developed to an extent that there is no scope for strategic employment development there. In effect the expanded strategic requirement for Area 7 must

be met in Rugby, and Coton Park East will make an important contribution in this regard.

As such, and in these terms, AC Lloyd and Panattoni, support Policy S3.

(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.

N/A

(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:

Panattoni / AC Lloyd are promoting one of the proposed major employment allocations in the Plan. Some of their representations are detailed and concerned with site specifics which may require further explanation in person.

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:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices>

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	<input type="text" value="S7 and related annex"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

For the reasons set out elsewhere in these representations AC Lloyd and Panattoni are broadly supportive of the approach taken in identifying the requirement for employment land and the strategic distribution of allocations to meet it. AC Lloyd and Panattoni are also strongly supportive of the allocation of Coton Park East (Site 64) for employment development, and which they are actively promoting for development. The expression of that allocation in Policy S7 is also supported.

However, Policy S7 also relies on development principles set out in an Annex to the Draft Plan. Elements of those principles presented in the Annex are unsound, and taint Policy S7 accordingly.

The evidence base (Stage 2 Site Options Assessment, December 2025) explains the process followed by the Council in identifying the most suitable options for site allocations. As such, the endeavour was not simply to identify sites with potential, it was to identify the most suitable ones. This relied on site visits and consideration of a raft of relevant topics to arrive at the professional planning view of officers.

After this detailed assessment the conclusion was reached that Coton Park East is a site with relatively low constraints. It was recommended as a proposed employment site. In this way it was recognised as being amongst the most suitable sites for allocation within Rugby.

The Stage 2 Site Options Assessment observes that the site was previously allocated for residential development, but an employment alternative would likely

result in fewer vehicle movements, particularly at peak times. Elsewhere the evidence base (Topic Paper: Development Needs, December 2025) highlights the strength of the position in the emerging Local Plan around its ability to allocate sufficient land to meet the requirement for housing. It also demonstrates that very strong housing completion rates have been achieved in Rugby over recent years, notwithstanding that the previous residential allocation (indeed permission) at Coton Park East has not been delivered.

In this context and noting the comments made elsewhere in these representations, read as a whole the evidence base demonstrates a clear need for employment land, identifies Coton Park East as a key element of the land to be allocated to meet that need, recognises it as being amongst the most suitable locations for development, and provides a clear rationale for it being allocated for employment rather than residential use. Its credentials are strong, and its allocation should be firmly supported.

It should also be noted in this context that as the Regulation 19 document has passed through the stages of scrutiny at the Council emphasis has rightly been placed on deliverability, against a backdrop of ensuring strict timescales for Plan progression are met. In relation to Coton Park East the Report to the Council's January 6th 2026 Cabinet meeting explains the background to and rationale for the proposed employment allocation here, the pivot from the previous consideration of this as a residential site, the credentials of the site and those promoting it, the benefits it can offer beyond the provision of strategic employment space, and highlights the advice from officers that this is the best located potential employment site option at Rugby. More generally, it underlines the importance of options for employment land provision outside the Green Belt. This further reinforces the status of Coton Park East as a critical component of the proposed employment land supply.

However, the deliverability of this important and well-founded draft allocation is then undermined by aspects of its treatment in the Development Site Annex to the Plan.

The first criterion in the Annex requires the provision of at least 0.75ha of land to be provided for the Primary School for, "playing fields / sports facilities and a forest school". This land would be a real benefit of the allocation, making expansion space available for the school that would otherwise not be possible, also offering potential as a community resource when not in use by the school. However, there is uncertainty in terms of what this space might be used for. The focus to date has been sports pitches (which may well be artificial surface) rather than playing fields as such, and a forest school, but that might change depending on school needs, including in terms of improving their parking and drop off arrangements. The wording as currently expressed would not provide this flexibility. It should be changed.

The second criterion in the Annex requires, "Provision of 4,000m² of space in smaller units of up to 1,500m² for small and medium sized businesses." This requirement for smaller units would be a further real benefit of the allocation in circumstances where a desire to provide such units has long been expressed by the Council and other sites which were expected to include such space have failed to do so. However, the wording as currently expressed is inflexible and limiting, and imposes an artificial restriction on the development that might be brought forward. There is no reason why the provision should be exactly 4,000m², but that is what this wording demands. It should be changed.

The fifth criterion in the Annex is similarly inflexible, but also inconsistent. This needs to be remedied. It opens by indicating that two main vehicular points of access to the site (from Central Park Drive and Castle Mound Way) "shall" be created, but then states that access to smaller units "can" be achieved from Central Park Drive, suggesting this is not a requirement.

The first objective of this criterion is to limit conflict between commercial traffic and movements associated with the school. That objective could be achieved by taking all access from a single point off Castle Mound Way. Equally, it could be achieved by taking all access from Central Park Drive whilst implementing highway improvements to limit any conflict there. A third option could be to have two points of access and design or management measures again to limit any conflict. As framed, though, the wording seems to indicate just one access strategy option (requiring two accesses), although as expressed this is not clear.

The further objectives of the access requirements in this criterion include to, "prevent noise, vibration and air quality impacts of heavy traffic on children using outdoor spaces at the school." There is no evidence that the points in this sentence would be an issue to any material extent. Inclusion of the text in this sentence implies this is an identified, evidenced concern. These specific impacts are not ones that should affect development here.

The sixth criterion in the Annex requires the provision of a pedestrian, cycle and bus link between the site and Vervain Drive to the south. Achieving a pedestrian and cycle link between Coton Park East and land to the south should be encouraged. However, the requirement for a bus link with Vervain Drive is inappropriate and also undeliverable; it should be removed.

Table 3b of WCC's Residential Street Design Guide provides standards for secondary roads such as Vervain Drive. It states that where roads form part of a bus route, a road width of 6.7m is required (where on-street parking occurs) or 6.1m (where there is no on-street parking). Vervain Drive has a width of 6.1m but does not feature any parking restrictions and it is evident that on-street parking routinely takes place there. Vervain Drive is of insufficient width to accommodate a bus route in accordance with LHA standards. Those standards also require segregated pedestrian and cycle provision where a bus route is proposed; again, there is insufficient space to accommodate segregated cycle provision here. The turn in to Vervain Drive can also not be safely achieved with the radius of the junction here without a bus using the full width of the carriageway. WCC's design guide also states that vertical traffic calming measures should not be used on bus routes. However the network here including other nearby roads such as Chervil Way features raised tables at regular intervals (as well as horizontal measures and no parking controls). This is unacceptable and goes against standard design requirements for bus routes.

The formation of a bus link here would also require a notable levels change to be overcome in circumstances where the development plateau within the site is expected to be dropped to reduce the impact of new employment buildings there on houses to the south. This, and the land take required to accommodate the infrastructure for a bus link, would eat into the strategic landscaping more appropriately to be provided here. It would open up the visual relationship between the existing residential area and the new employment development and limit the effectiveness of screening. The locality is also adequately served by bus routes without the need to divert one through the site, and there are no plans to provide an additional service here.

The seventh criterion requires accordance with a Design Code. There is no need for this; it will only serve to delay the delivery of development here. This is not a notably sensitive location and it can be developed in a routine manner as the natural expansion of existing employment development to the west. The Annex already includes a series of criteria to guide the scale and distribution of development, and a diagram further to inform that, whilst the usual additional controls will exist in any event through the Development Management process. A Design Code would serve no useful purpose.

The Plan associated with the development requirements for Coton Park East in the Annex should be amended to reflect the above points, and others, as follows.

The Indicative vehicular access from the north should be shown extending into the site off Castle Mound Way, not off the new access to the future employment development to the north. The expectation should be that any such access here is formed from what is currently public highway.

The key text identifying the school land should refer simply to, "Indicative location for Rugby Free Primary School facilities."

The area identified as an "Indicative green buffer" includes land at the lower (southern) parts of the site which will include drainage. It should instead be referred to as, "Indicative green buffer / blue infrastructure".

The "Indicative access – public transport and active travel only" reference should be amended to delete reference to public transport. The indicative vehicular route between this and Central Park Drive should be removed.

Additionally, whilst the key to the Plan appropriately includes the word "Indicative" it would be helpful if text could be added to the title of the Plan to emphasise that it is "Schematic Only". It is important to make clear to all users that the sizes, shapes and alignments of features on the drawing are to be understood schematically, not precisely.

These shortcomings with the detailed wording in the Annex addressing Coton Park East mean that the policy (S7) which relies on them is not effective. The Annex should be reworded to be more flexible, where appropriate, but also consistent and expressed with greater clarity.

(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.

The end of the first criterion of the Coton Park East requirements in the Annex should be amended to read, "...Primary School to include outdoor sport / recreation and learning and other facilities".

The second criterion should be amended to read, "Provision of at least 4,000 m2 of space..."

The fifth criterion should be amended to require an access point or points to be formed in a manner which limits acceptably any conflict between commercial

traffic and movements associated with the school, and clarifying that the formation of two access points is not essential.

The sixth criterion should be amended to support provision of a pedestrian and cycle link to the south but remove any reference to the provision of a bus link.

The seventh criterion (Design Code) should be removed.

The associated Plan should be amended / clarified in the manner described above.
(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:

Panattoni / AC Lloyd are promoting one of the proposed major employment allocations in the Plan. Some of their representations are detailed and concerned with site specifics which may require further explanation in person.

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:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>

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	E1	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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 central purpose of this draft policy – to protect employment land for employment use – is appropriate. However, as framed, it is unsound. It would stand in the way of development needs being met, is unjustified in its approach, and is ineffective in the extent to which it would support sustainable development. There are two main difficulties here.

First, part B of the draft policy is onerous. The marketing requirement – 24 months – is extremely long. Also, as drafted the policy would operate in a way that would require the marketing of land for two years but then additionally prevent its alternative use unless development is unviable, notwithstanding the fact that a two year marketing exercise would have identified no appropriate interest. Development might be viable in the sense that a theoretical appraisal supports it, but unreasonable in the sense that the marketing exercise would in this scenario have demonstrated an inability to secure a tenant or purchaser.

Second, the policy is blind to the fact that modern employment locations at scale often rely on the provision of some supporting activity on site to attract and secure tenants and a workforce. The effective embargo on such uses created by draft Policy E1 would place employment sites in Rugby at a disadvantage compared to locations elsewhere. It is important that any such facilities – for example small scale retail, food and beverage, exercise, or childcare – are carefully controlled and limited to a type and scale to support the employment site upon which they are located, but they should be allowed.

(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.

Part B(i) of the policy should be amended to change the marketing period from 24 to 12 months, and the closing word of this criterion should be changed from "and" to "or".

The policy should be expanded to allow supporting (non-employment) services and facilities at employment sites where ancillary to the employment function, and related in type and scale to meeting the needs of the businesses and employees at those sites.

(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:

Panattoni / AC Lloyd are promoting one of the proposed major employment allocations in the Plan. Some of their representations are detailed and concerned with site specifics which may require further explanation in person.

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:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>

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	EN6	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Paragraph 5.17 of the draft Plan rightly confirms that, "there may be sites for which achieving 20% canopy is not possible or desirable", and that in those circumstances some alternative may be negotiated. This will inevitably be the case for a range of reasons across many sites. The wording of the associated policy does not reflect this, and so is not justified or effective.

(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.

The wording of the policy should be amended to refer to 20% canopy cover as a target, rather than requirement, and include the provisions of paragraph 5.17 rather than relegating that to the supporting text.

(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:

Panattoni / AC Lloyd are promoting one of the proposed major employment allocations in the Plan. Some of their representations are detailed and concerned with site specifics which may require further explanation in person.

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:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>

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	EN7	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Part C of the policy seeks to safeguard from development areas within 8m of the edge of a watercourse. This would undermine the effectiveness of one of the Plan's key employment land allocations (Coton Park East) which is traversed diagonally by a watercourse. The realisation of this allocation requires the watercourse to be crossed by access ways, which would conflict with this provision.

(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.

Text should be added to the policy to explain that where the effective realisation of allocations relies on the crossing of or other works to existing watercourses or main rivers this is allowed but should be carried out in a sensitive manner and limiting the intervention as far as possible.

(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:

Panattoni / AC Lloyd are promoting one of the proposed major employment allocations in the Plan. Some of their representations are detailed and concerned with site specifics which may require further explanation in person.

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:
<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>