

## Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

**Name of the Local Plan to which  
this representation relates:**

Rugby Borough Council Proposed  
Submission Local Plan

**Please return to Rugby Borough Council by 5:00pm Friday 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with **Proposed Submission Consultation in  
the subject line, OR by post to:** Development Strategy, Town Hall, Evreux Way,  
Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each  
representation you wish to make.

### Part A

#### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

#### 2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Chris"/>	<input type="text"/>
Last Name	<input type="text" value="Parsons"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="████████████████████"/>	<input type="text"/>
Line 2	<input type="text" value="██████"/>	<input type="text"/>
Line 3	<input type="text" value="██████"/>	<input type="text"/>
Line 4	<input type="text"/>	<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: Chris Parsons

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

Local Plan Paragraph	1.17	Local Plan Policy	S1	Policies Map	Brinklow
Site ID	315 and 337				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This Local Plan proposes large scale developments in several rural locations, some of which are on greenfield and Green Belt land. The possible contribution of smaller and in-fill development hasn't been properly taken into account. The effect on roads and transport, sewage and drainage, education and health services hasn't been adequately addressed and such large scale developments could overwhelm the existing local infrastructure.

In the case of Brinklow, the Parish Council supported an in-fill development that will provide 18 dwellings, in policy H04 of their Neighbourhood Plan, dated November 2022 and adopted by Rugby Borough Council (RBC). This development is currently proceeding to a planning application.

Another example in Brinklow is the recent sale by the Estates and Property Department of RBC of the site of 22 derelict, council owned, battery garages in Yew Tree Hill for development and potential construction of several houses. RBC have also indicated their intention to sell the site of further battery garages at George Birch Close with the potential for 4 more houses. These are, of course, brownfield sites and to be preferred over greenfield locations.

(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.

Paragraph 1.17 of the proposed Local Plan implies priority and preference for large scale developments at rural settlements and states that any further development should be in proportion to the settlement and small scale.

I suggest that this paragraph should be changed to prioritise gradual, small scale and in-fill developments, which would therefore be in proportion to the size of the settlement and within the capacity of the existing infrastructure. Large scale developments, particularly on Green Belt land, should only be allowed under exceptional circumstances, as stated in the National Planning Policy Framework.

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

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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**, I do not wish to participate in hearing session(s)

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9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

AI has not been used in this representation.

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: Chris Parsons

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

Local Plan Paragraph	1.31	Local Plan Policy	S5	Policies Map	For example Brinklow
Site ID	For example 315				

4. Do you consider the Local Plan:

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

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Policy S5 restricts development within settlement boundaries to certain types specified in paragraph 1.31.

For example, this Local Plan proposes a residential development of around 250 dwellings on site 315, which is outside the settlement boundary (and is, in fact, currently productive agricultural land in the Green Belt).

I believe that policy S5 is sound, but that some sites in the Plan are unsound because they do not conform to this policy.

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

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Remove all sites that do not conform with policy S5.

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

Name or Organisation: Chris Parsons

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

Local Plan Paragraph		Local Plan Policy	S5	Policies Map	Ansty and Brinklow
Site ID	14, 95, 121, 315 and 337				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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This concerns development on Green Belt land.

The Green Belt area is shown on the Policies Maps, however the boundary of the Green Belt has been changed in many places to accommodate the proposed employment and residential site allocations of this Plan. These changes are detailed in one of the evidence documents and are considerable. One of the purposes of this Green Belt is to check the unrestricted sprawl of Coventry, yet some of the large development sites in this Plan are adjacent or close to the boundary with Coventry.

Rugby Borough Council commissioned a comprehensive assessment of the individual contribution of each site to the objectives of the Green Belt, and scored and mapped them in the evidence. However, the combined effect of these developments would be a significant extension of the built-up area of Coventry. This is evident on the proposed Policies Map around Ansty and Ryton-on-Dunsmore.

Some of these developments have already been announced or approved and appear to be included in this plan retrospectively. In particular:

- The employment development at Ansty Park, adjacent to site 121, was built several years ago on Green Belt.
- Site 121 is facilitated by a new Junction on the A46, which was announced by National Highways after the Development Consent Order (DCO) was granted early in 2026, with construction starting late 2026.

- Site 95 has already been granted planning permission by RBC, application number R23/1027 issued in May 2025.
- Site 14 is adjacent to the existing Ansty Park development and the authorised Site 95 development, and is therefore an extension of the urban sprawl into the Green Belt.

Ansty Park is around 2km from the boundary of Brinklow and is already clearly visible from many parts of the village. Proposed residential sites 315 and 337 are on what is presently Green Belt, adjacent to the settlement of Brinklow. Site 315 is currently productive agricultural land. The combination of the several employment sites listed above and the nearby residential sites at Brinklow would risk built-up areas merging into one another.

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

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In conclusion, this plan does not meet the purpose of the Green Belt, which is to limit the sprawl of the large built-up area of Coventry, prevent neighbouring areas merging and safeguard the countryside from encroachment. I suggest sites 14 and 315 be withdrawn from the plan.

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

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

Name or Organisation: Chris Parsons

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

Local Plan Paragraph	B	Local Plan Policy	W1	Policies Map	Binley Woods
Site ID					

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Coventry Stadium, between Binley Woods and Brandon, was a speedway stadium, but has not been used and has been derelict for 10 years. A small group of enthusiasts call for its re-opening, but there is little realistic prospect of it ever being restored and used again for speedway or other sports. It was offered as a site for residential development, but Rugby Borough Council have devised strategy W1 in the Plan, which prevents its redevelopment. This seems to be a personal initiative of one or two RBC councillors. It is, of course, a brownfield site, although it is nominally in the Green Belt.

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

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Allow redevelopment of the Coventry Stadium site. In the Plan, remove paragraph B from strategy W1 and remove reference to Coventry Stadium in paragraph 7.2.

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