

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

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	3.1	Local Plan Policy	Infrastructure I4 Infrastructure and planning obligations	Policies Map	No
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Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

No

(2) is Sound

No

(3) complies with the Duty to co-operate

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.

Section 1: Management Failure (C3 Housing Grade)

To which part of the Local Plan does this relate? * Paragraph: 1.1-1.5 (Context and Vision)

Policy: GP1 (Securing Sustainable Development) & DS1 (Overall Development Needs)

Your Representation:

I object to the Local Plan as Unsound because it is not Effective or Justified. My lack of confidence in the Plan is based on the Regulator of Social Housing's (RSH) C3 Grading issued to Rugby Borough Council on 25 February 2026. This grading confirms "serious failings" in delivering consumer standards and resident safety.

The Council has breached the Social Housing Regulation Act 2023 and mandatory Safety and

Quality Standards. Specifically, the RSH found 800 homes with expired electrical safety certificates and 600 homes with no smoke alarms. Furthermore, the Council reported a 99.54% "Decent Homes Standard" compliance rate which the Regulator found to be unverified and based on partial, unanalyzed data.

This is a direct indicator of systemic management failure. A Council that cannot manage the basic fire and electrical safety of its current 3,500 properties is not "Effective" enough to oversee the massive, complex infrastructure requirements of the 2024-2045 Local Plan. Proposing thousands of new homes while existing residents are left in potentially life-threatening conditions due to "lack of system integration" (as cited by the RSH) proves the Plan is not Justified. The Council must demonstrate it has rectified these "serious failings" and restored a culture of transparency before any further large-scale growth is considered. Without this, the Plan fails the NPPF test of being "Positively Prepared" for the safety of the community.

Section 2: Infrastructure & Education Crisis

To which part of the Local Plan does this relate? * Paragraph: 1.34 & 1.35 (Infrastructure Delivery)

Policy: I1 (Infrastructure Delivery) & DS3 (Residential Allocations)

Your Representation:

I object to the Local Plan as not Legally Compliant and Unsound due to a failure in the Duty to Cooperate (Section 33A, Planning Act 2004) with Warwickshire County Council.

1. Education & Safeguarding: The Council is failing to provide a sustainable strategy for school places. Relying on the Fair Access Protocol to force unplanned placements into already over-capacity schools is a reactive emergency measure, not a sound planning policy. This overcrowding compromises the Section 175 Safeguarding Duty (Education Act 2002). The Plan fails to prove that every child—including those in unplanned temporary accommodation—will have access to a safe, local school place.

2. Strategic Road Network Failure: The transport evidence is biased and ignores the structural decay of the highway, breaching the Section 41 (Highways Act 1980) duty to maintain. The Plan is Ineffective as it fails to mitigate the cumulative impact on key gridlock junctions, specifically:

Lawford Road: A main artery in a state of physical collapse being used for further high-density allocations.

Murray Road Roundabout, Benn Hall Roundabout, and Corporation Street: These central junctions are already at a standstill; the Plan offers no realistic "Sound" solution for the added volume.

The Council is prioritizing developer-led growth over the physical safety of our roads and the education of our children. I demand a joint, independent Safety and Capacity Audit with the County Council. Until the Council can prove the roads are fit for purpose and school places are guaranteed, this Plan remains undeliverable and Unsound.

(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.

Suggested Modification 1: Addressing Management Failure & Safety

Policy/Text to be modified: Policy GP1 (Securing Sustainable Development) and Policy DS1 (Overall Development Needs).

Suggested Revised Wording: > "Add a new criterion to Policy GP1: 'The Council will demonstrate that all strategic development is underpinned by robust, verified safety data. No significant new housing allocations will be triggered until the Council provides independent verification that it has met the requirements of the Social Housing Regulator's Consumer Standards, specifically regarding fire and electrical safety, to ensure the authority has the management capacity to oversee further growth.'"

Why this modification makes the Plan Sound: > "This modification makes the plan Justified and Effective. A plan cannot be sound if the authority overseeing it is in a state of 'serious failure' (C3 Grade, Feb 2026). This change ensures that the Council's management capacity is brought up to a legal and safe standard before it attempts to deliver the complex infrastructure required for thousands of new homes."

Suggested Modification 2: Independent Infrastructure & Education Audit

Policy/Text to be modified: Policy I1 (Infrastructure Delivery) and Policy D1 (Transport).

Suggested Revised Wording: > "Amend Policy I1 to include: 'Before any development is approved on strategic sites (including Long Lawford), a joint Independent Infrastructure and Safety Audit must be conducted by Warwickshire County Council. This audit must verify:

That school capacity exists without reliance on the Fair Access Protocol for permanent placements.

That the structural integrity and safety of the Lawford Road artery and key junctions (including Murray Road and Benn Hall roundabouts) are sufficient to handle cumulative growth without breaching the Section 41 Highways Duty.'"

Why this modification makes the Plan Sound: > "This modification ensures the plan is Legally Compliant and Effective. It addresses the current failure in the Duty to Cooperate by forcing a transparent, data-led partnership with the County Council. It prevents 'planning by accident' where schools and roads are pushed beyond their legal and safe limits."

(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)?

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:

Participation Statement

"I consider my participation in the oral examination to be essential for the following reasons:

Complexity of Evidence: My representation involves a critical intersection between Rugby Borough Council and Warwickshire County Council regarding the Duty to Cooperate (Section 33A). This relationship is currently failing to protect local residents, and oral questioning is required to test the Council's evidence on school and road capacity.

Impact of Management Failure: As a lifelong resident, I can provide first-hand testimony on how the C3 Housing Failure (Feb 2026) is not an isolated issue but a symptom of the systemic lack of transparency and safety oversight that makes this entire Local Plan Unsound.

Infrastructure Realities: I wish to provide specific evidence regarding the structural decay of Lawford Road and the cumulative traffic failures at the Murray Road and Benn Hall roundabouts. These are matters of Section 41 (Highways Act) legal duty that cannot be fully assessed through a paper-only review.

Economic Viability: While I warmly welcome the Council finally granting the 'green light' for the Aldi site (R22/1102) today, the fact it was delayed for years proves the previous policy was Ineffective. I wish to ensure the new Local Plan is modified to prevent such 'designed blight' from happening to other brownfield sites in Rugby.

Safeguarding Concerns: The use of the Fair Access Protocol for unplanned school placements is a serious Section 175 Safeguarding matter. I wish to ensure the Inspector hears the community's concern that the Council is prioritizing housing numbers over the safety and education of our children."

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.

"I have used Grok AI solely as a tool to assist with grammar, spelling, and the structural formatting of my representation to ensure it is clear and professional. Verification and Accuracy: All factual information, evidence, and arguments presented in this representation are the result of my own independent research. This includes: Direct evidence gathered from Government websites (including the Regulator of Social Housing C3 Grading). Extensive 'digging' into local planning forums and Social Media community groups to identify consensus on infrastructure failure. First-hand discussions with local business owners regarding the economic impact of 'designed blight' and the unviability of current retail policies. Personal observations as a lifelong resident regarding the structural decay of Lawford Road and congestion at the Benn Hall and Murray Road roundabouts.

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>