

## 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.*

Title

First Name

Last Name

Job Title  
(where relevant)

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

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

Cllr

Jill

Simpson-Vince

Ward Councillor

On behalf of Conservative  
Group at RBC

Town Hall

Evreux Way

Rugby

CV21 2RR

E-mail Address

Jill.simpson-  
vince@rugby.gov.uk

(where relevant)

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

Name or Organisation: **Conservative Group at Rugby Borough Council**

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input checked="" type="text"/>	Policies Map	<input checked="" type="text"/>
Site ID	<input checked="" type="text"/>				

4. Do you consider the Local Plan:

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

We consider that the administration has felt a need to rush this and therefore the plan has flaws and is unsound. There are areas within the plan that we are happy about, but the entire plan is jeopardised by being unsound.

There are sites within the Reg 19 version of the local plan that were not included in Reg 18. These are sites that have not been consulted upon at this stage. The Conservative Group suggested amendments to the local plan that were not accepted by the Labour and Lib Dem controlling group, and we were told these could not be considered as they had not been consulted on in Reg 18. These were sites that were within the call for sites information, the same as the sites now appearing in the current version of the plan. There is a contradiction here – if our sites cannot be considered, then the sites added in for Reg 19 consultation can also not be considered. Or, both sets of sites needed to be considered in a fresh Reg 18 consultation.

With regards to legality, between Reg 18 and Reg 19, there was a green belt assessment and the results of the brownfield sites assessment. These should have been completed before Reg 18. The green belt assessment has now placed large areas of green belt between Rugby and Coventry as grey belt. There is no explanation for how this area has been determined. The original grey belt was intended to be, for example, old car parks in villages, or at the edge of villages.

Princethorpe, Stretton-on-Dunsmore and surrounding countryside are now all grey belt with no explanation.

Brownfield sites within the town centre have small numbers of properties allocated to them. We feel this is purely political as these sites can easily take more. For example, Rounds Gardens was a site of tower blocks that had to be demolished. The site can take more than the 70 properties currently suggested in the plan.

With the existing and previous local plans, the Conservative Group put development onto areas that were, politically, Conservative as it was the right thing to do for Rugby Borough as a whole - Houlton and South West Rugby, both in Conservative areas, took the main numbers for development. This time, the dispersal strategy impacts the rural areas, whilst not taking into account properties that could be built on brownfield sites in Rugby – sites that were previously unavailable. In our opinion this also makes the plan unsound, as it should be strategic, not political and the administration is risking all areas by producing an unsound plan.

(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.

**Policy S2, Strategy for Homes** pg. 13: We suggest that the Small Sites Windfalls be increased from 850 to 1,225. This represents approximately 75 dwellings per year, which remains below the number delivered over previous plan periods and is achievable in line with the Government's changes to planning policy to make small scale, sustainable development easier to deliver. This represents a net increase of 375 units expected across the plan period. (This number could actually go higher as there will also be small sites of 5 – 10 properties that are not currently covered anywhere. )

**Policy S6 (Residential Allocation).**

Ref 96: Land at Coventry Road, Wolvey. Allocate 175 units on site This site is to be allocated around the Coventry Road on either side of the road, but not extend beyond the existing building line created by Hollick Way and Brookfield Drive to the west of Coventry Road.

Remove site Ref 136 North of Warwick Road, Wolston. The plan insists this should be a retirement development in a rural village as a development that wasn't retirement would require school places. Given the location and the access to public transport, etc, we do not think this will go ahead and can see it reverting to a non-retirement site.

Remove site Ref 307 North Road, Clifton Upon Dunsmore – this is part of land, so it is likely that this is going to increase in number as the developer then decides to build more, if going ahead.

Remove site 315 Land south of Rugby Road, Brinklow. Overdevelopment of the green belt.

Remove site Ref 316 Land at Long Lawford. We also wanted site S253 removed. The green belt was put in place to protect Rugby and Coventry. These sites, which

are in the green belt, join Long Lawford to Rugby. In turn this means the distance between Rugby and Coventry is reduced, which is contrary to the intention of green belt. We feel very strongly that these sites should be removed.

Site Ref 350, Rounds Gardens Rugby – change from 70 units to 120 units (as detailed in Point 5). Development to be delivered in line with Biart Place/Navigation Way.

Remove sites 358 and 309, Land north of B4109 Wolvey and Land at Coventry Road, Wolvey. This is linked to site 96 above.

Retain Coton Park East as residential development land. This allocation shall retain the proposed 0.75ha land for Rugby Free Primary School playing fields. The school has been open for 10 years and was built on the basis of the area becoming residential. AC Lloyd, the previous proposed developer, have said they cannot sell the land for residential. We dispute this as developers around the country build next to motorways and railways lines. AC Lloyd, as a company, are in the process of closing their residential department and are not intending to go ahead with residential properties anywhere in the country. Three local plans previously had stated this area was for residential development, and it had outline planning for residential, granted in 2022. In 2025, AC Lloyd applied for the road access for the residential to be granted (R25/0210). This consultation was still active in 2025 and to date hasn't been decided. We think this should still be a residential development. If not, it needs to stay as farmland.

**Policy S7 Employment Allocations:**

We dispute the numbers for the employment allocations and think the number is too high.

Remove site reference 64 Coton Park East – see above

Remove site reference 121 Land at Walsgrave Hill – this site is in the middle of the green belt and next to a SSSI site. This site, if built, reduces the distance between Coventry and Rugby. This site is not needed at this location and the site in the paragraph below could take this allocation.

Allocate site reference 130 Land north of Houlton. This site sits opposite DIRFT3 on the A5 in Northamptonshire and is already subject to large warehousing. Houlton is located immediately next to DIRFT. This site is already on the A5 trunk road with access to the M1 at Junction 18 and the M6 at Junction 1.

**Policy EN3:**

This policy deals with retaining the Rainsbrook Valley. We support the policy but would like to alterations to it:

- 1) The Dunchurch Park Hotel has temporary 'pods' in the grounds. It needs to be clear that these cannot be made permanent under the policy and that any development of this site would need to undergo the same scrutiny as any other proposed accommodation/residential developments impacting the Rainsbrook Valley.
  
- 2) Rainsbrook Valley Railway is a leisure attraction already in situ on Barby Road. The policy would need to reflect that this attraction might, from time to time, need to add or change buildings to accommodate visitors and/or heritage equipment. We would not want the policy to be a block to this community asset and attraction.

(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:

The sites named in Point 6 are ones that we think need to change to make the plan sound. The dispersal strategy pursued by the Labour/Lib Dem administration has a huge impact on local services and transport and we think makes this plan unsound.

**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.

Not used AI

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>