

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

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?

Paragraph	Residential allocations – Long Lawford	Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	316				

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.

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1. Richborough supports the allocation of Site 316 for approximately 400 dwellings; however, elements of the Site Allocation Annex require modifications. Three of the requirements are drafted too rigidly and require minor modification to ensure the policy is effective and therefore sound in accordance with the NPPF.
2. The Annex does not currently allow for reasonable flexibility in relation to (a) the potential reuse of the L-shaped building, (b) the practical delivery of Public Right of Way connections, and (c) the provision of on-site convenience retail and community space. These matters depend on viability, detailed layout considerations and further technical work, and must not be expressed as absolute requirements. Without small refinements, the Annex risks placing unnecessary constraints on the delivery of this strategic allocation. Accordingly, Richborough considers the Annex requires minor modifications to ensure effectiveness and deliverability.

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.

3. Bullet Point 2 – L-shaped building

Amend to:

“...retain and reuse the 19th-century L-shaped building where viable and capable of retention and reuse for viable purposes.”

4. • Bullet 6 – Public Right of Way connections

Amend to include:

“...connections with off-site public rights of way where possible.”

5. • Bullet 8 – Convenience retail / community space

Amend to:

“Small-scale convenience retail and community space should be provided where viable”

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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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?

Paragraph	<input type="text"/>	Policy	<input type="text" value="C4"/>	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 checked="" type="text" value="X"/>
(3) complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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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.

<p>1. Policy CL4 should be reviewed to ensure full consistency with the revised climate policies in the draft NPPF (December 2025), including the updated approach to climate mitigation and adaptation. Ahead of submission, the Council must ensure that CL4 reflects the revised national expectations on carbon reduction, resilience and wider climate obligations.</p>
--

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.

<p>2. Review and update CL4 to align with the revised NPPF climate policies prior to submission.</p>
--

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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?

Paragraph	<input type="text"/>	Policy	<input type="text" value="CL1"/>	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 checked="" type="text" value="X"/>
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1. Policy CL1 should be reviewed to ensure full consistency with the revised climate policies in the draft NPPF (December 2025), including the updated approach to climate mitigation and adaptation. Ahead of submission, the Council must ensure that CL1 reflects the revised national expectations on carbon reduction, resilience and wider climate obligations.

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2. Review and update CL2 to align with the revised NPPF climate policies prior to submission.

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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?

Paragraph	<input type="text"/>	Policy	<input type="text" value="CL2"/>	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 checked="" type="text" value="X"/>
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Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="H2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

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(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
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- Richborough supports the principle of delivering affordable housing as set out in Policy H2. However, the policy as drafted is unsound because it does not incorporate the flexibility described in paragraphs 6.5 and 6.6 of the supporting text. These paragraphs acknowledge that site-specific viability evidence may justify alternative affordable housing provision. This flexibility is fundamental to ensuring the policy is effective and consistent with national policy.
- The Council's Viability Assessment¹ applies borough-wide sales data and broad development typologies, and thus further detailed testing at planning application stage will inevitably be required for large allocations such as Site 316. It is therefore important that the flexibility already acknowledged in paragraphs 6.5 and 6.6 is included within the policy text itself, to ensure that H2 is applied proportionately and remains effective across a range of site-specific circumstances.

¹ Rugby Borough Council: Local Plan Viability Study (December 2025)

3. This approach is consistent with paragraph 2.2 of the Council’s Viability Study, which confirms that area-wide testing cannot reflect individual site characteristics and that site-specific viability assessments may be necessary at application stage.

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4. Amend Policy H2 (within the boxed policy text) to include wording that reflects paragraphs 6.5 and 6.6 of the Local Plan, for example:

“The level and mix of affordable housing will be informed by viability evidence. Where site-specific viability assessments demonstrate that full policy compliance is not achievable, the Council will apply review mechanisms and consider a reduced level of provision”.

5. This modification ensures the policy is effective, delivers the Council’s intended approach, and aligns with national guidance on viability and plan-making.

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Name or Organisation:

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Paragraph	<input type="text"/>	Policy	<input type="text" value="S6"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

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(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input checked="" type="text" value="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.

1. The proposed allocation comprises land in two ownerships, and promoted separately by Richborough and Davidsons respectively. The two parties are however collaborating in the interests of good planning to bring forward a comprehensive development.
2. Richborough supports the inclusion of Policy S6 in the Local Plan and welcomes the clarity it provides regarding the spatial distribution of new homes over the plan period. Policy S6 forms a vital component of the Council's strategy to deliver the required housing growth and maintain a five-year supply. The site is well-located on the western edge of Rugby town and directly south of Long Lawford village. It forms part of a coherent cluster of allocations within the wider growth area, delivering housing, connectivity improvements and new local amenities.
3. Long Lawford is identified as one of Rugby's Main Rural Settlements, capable of accommodating further development owing to its accessible location and proximity

to Rugby town. The Draft Plan (at Paragraph 1.6) explicitly recognises that a significant planned expansion south of Long Lawford is required to support the sustainability of the village and to enhance walking, cycling and public transport links into Rugby, delivering new amenities and supporting the school at the heart of the settlement.

4. The allocation of Site 316 is fundamental to achieving this strategy. Its allocation is therefore strongly supported as a justified and effective mechanism for contributing to the overall housing requirement while delivering balanced, sustainable rural growth. The site's inclusion within Policy S6 ensures the Local Plan is positively prepared, consistent with national policy, and capable of responding to the full range of housing needs across the Borough.
5. The Council's Stage 2 Assessment¹ identifies several considerations for Site 316, but all are entirely capable of being addressed through the emerging masterplan. Matters such as landscape sensitivity, ecology, and the setting of Avon Lodge can be positively resolved through design, buffers and technical work. None of the noted considerations represent barriers to delivery, and the evidence confirms the site is suitable, achievable and appropriate for allocation.
6. The Council's Sustainability Appraisal² confirms that the allocation performs well overall, with transport, accessibility and deliverability advantages over alternatives, and that all identified constraints are capable of being fully mitigated through masterplanning. These benefits form an important part of the exceptional circumstances case for releasing the land from the Green Belt. The masterplan will establish a strong, permanent and defensible southern boundary for the Green Belt ensuring a clear, permanent edge to the settlement.

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.

¹ Rugby Borough Stage 2 Site Options Assessment (December 2025)

² Sustainability Appraisal (SA) of the Rugby Borough Local Plan (December 2025)

7. No changes 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:

8. To respond to the Inspector's questions, elaborate on the points raised, and respond to any objections to the draft allocation.

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.

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>



Richborough

Land at Long Lawford

Rugby Local Plan

Proposed Submission Local Plan Consultation (Regulation 19)

March 2026



1. Introduction

1. The following representations are made in response to the Rugby Proposed Submission Plan Consultation (Regulation 19) on behalf of Richborough, in respect of their land interest at Land at Long Lawford (SA Site Ref: 316).

S6 Residential Allocations

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

Paragraph	
Policy	S6
Policies Map	
Site ID	

Do you consider the Local Plan:

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

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.

1. The proposed allocation comprises land in two ownerships, and promoted separately by Richborough and Davidsons respectively. The two parties are however collaborating in the interests of good planning to bring forward a comprehensive development.
2. Richborough supports the inclusion of Policy S6 in the Local Plan and welcomes the clarity it provides regarding the spatial distribution of new homes over the plan period. Policy S6 forms a vital component of the Council's strategy to deliver the required housing growth and maintain a five-year supply. The site is well-located on the western edge of Rugby town and directly south of Long Lawford village. It forms part of a coherent cluster of allocations within the wider growth area, delivering housing, connectivity improvements and new local amenities.

3. Long Lawford is identified as one of Rugby’s Main Rural Settlements, capable of accommodating further development owing to its accessible location and proximity to Rugby town. The Draft Plan (at Paragraph 1.6) explicitly recognises that a significant planned expansion south of Long Lawford is required to support the sustainability of the village and to enhance walking, cycling and public transport links into Rugby, delivering new amenities and supporting the school at the heart of the settlement.
4. The allocation of Site 316 is fundamental to achieving this strategy. Its allocation is therefore strongly supported as a justified and effective mechanism for contributing to the overall housing requirement while delivering balanced, sustainable rural growth. The site’s inclusion within Policy S6 ensures the Local Plan is positively prepared, consistent with national policy, and capable of responding to the full range of housing needs across the Borough.
5. The Council’s Stage 2 Assessment¹ identifies several considerations for Site 316, but all are entirely capable of being addressed through the emerging masterplan. Matters such as landscape sensitivity, ecology, and the setting of Avon Lodge can be positively resolved through design, buffers and technical work. None of the noted considerations represent barriers to delivery, and the evidence confirms the site is suitable, achievable and appropriate for allocation.
6. The Council’s Sustainability Appraisal² confirms that the allocation performs well overall, with transport, accessibility and deliverability advantages over alternatives, and that all identified constraints are capable of being fully mitigated through masterplanning. These benefits form an important part of the exceptional circumstances case for releasing the land from the Green Belt. The masterplan will establish a strong, permanent and defensible southern boundary for the Green Belt ensuring a clear, permanent edge to the settlement.

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

¹ Rugby Borough Stage 2 Site Options Assessment (December 2025)

² Sustainability Appraisal (SA) of the Rugby Borough Local Plan (December 2025)

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.

7. No changes necessary.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

8. To respond to the Inspector's questions, elaborate on the points raised, and respond to any objections to the draft allocation.

Annexe

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

Paragraph	Residential allocations – Long Lawford
Policy	
Policies Map	
Site ID	316

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"/>

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.

9. Richborough supports the allocation of Site 316 for approximately 400 dwellings; however, elements of the Site Allocation Annex require modifications. Three of the requirements are drafted too rigidly and require minor modification to ensure the policy is effective and therefore sound in accordance with the NPPF.

10. The Annex does not currently allow for reasonable flexibility in relation to (a) the potential reuse of the L-shaped building, (b) the practical delivery of Public Right of Way connections, and (c) the provision of on-site convenience retail and community space. These matters depend on viability, detailed layout considerations and further technical work, and must not be expressed as absolute requirements. Without small refinements, the Annex risks placing unnecessary constraints on the delivery of this

strategic allocation. Accordingly, Richborough considers the Annex requires minor modifications to ensure effectiveness and deliverability.

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.

11. Bullet Point 2 – L-shaped building

Amend to:

“...retain and reuse the 19th-century L-shaped building **where viable and capable of retention and reuse for viable purposes.**”

12. • Bullet 6 – Public Right of Way connections

Amend to include:

“...connections with off-site public rights of way **where possible.**”

13. • Bullet 8 – Convenience retail / community space

Amend to:

“Small-scale convenience retail and community space should be provided **where viable**”

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

14. To respond to the Inspector’s questions, elaborate on the points raised, and respond to any further information the Council submits.

H2 Affordable Housing

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

Paragraph	
Policy	H2
Policies Map	
Site ID	

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"/>

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.

15. Richborough supports the principle of delivering affordable housing as set out in Policy H2. However, the policy as drafted is unsound because it does not incorporate the flexibility described in paragraphs 6.5 and 6.6 of the supporting text. These paragraphs acknowledge that site-specific viability evidence may justify alternative affordable housing provision. This flexibility is fundamental to ensuring the policy is effective and consistent with national policy.

16. The Council's Viability Assessment³ applies borough-wide sales data and broad development typologies, and thus further detailed testing at planning application stage will inevitably be required for large allocations such as Site 316. It is therefore important that the flexibility already acknowledged in paragraphs 6.5 and 6.6 is

³ Rugby Borough Council: Local Plan Viability Study (December 2025)

included within the policy text itself, to ensure that H2 is applied proportionately and remains effective across a range of site-specific circumstances.

17. This approach is consistent with paragraph 2.2 of the Council’s Viability Study, which confirms that area-wide testing cannot reflect individual site characteristics and that site-specific viability assessments may be necessary at application stage.

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.

18. Amend Policy H2 (within the boxed policy text) to include wording that reflects paragraphs 6.5 and 6.6 of the Local Plan, for example:

“The level and mix of affordable housing will be informed by viability evidence. Where site-specific viability assessments demonstrate that full policy compliance is not achievable, the Council will apply review mechanisms and consider a reduced level of provision”.

19. This modification ensures the policy is effective, delivers the Council’s intended approach, and aligns with national guidance on viability and plan-making.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

20. To respond to the Inspector’s questions, elaborate on the points raised, and respond to any further information the Council submits.

Policy CL1 Net Zero Buildings

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

Paragraph	
Policy	CL1
Policies Map	
Site ID	

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"/>

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.

21. Policy CL1 should be reviewed to ensure full consistency with the revised climate policies in the draft NPPF (December 2025), including the updated approach to climate mitigation and adaptation. Ahead of submission, the Council must ensure that CL1 reflects the revised national expectations on carbon reduction, resilience and wider climate obligations.

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.

22. Review and update CL2 to align with the revised NPPF climate policies prior to submission.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

23. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

CL2 Renewable Energy and Low Carbon Technology

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

Paragraph	
Policy	CL2
Policies Map	
Site ID	

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"/>

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.

24. Policy CL2 should be reviewed to ensure full consistency with the revised climate policies in the draft NPPF (December 2025), including the updated approach to climate mitigation and adaptation. Ahead of submission, the Council must ensure that CL2 reflects the revised national expectations on carbon reduction, resilience and wider climate obligations.

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.

25. Review and update CL2 to align with the revised NPPF climate policies prior to submission.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

26. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

C4 Climate Adaption

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

Paragraph	
Policy	C4
Policies Map	
Site ID	

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"/>

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.

27. Policy CL4 should be reviewed to ensure full consistency with the revised climate policies in the draft NPPF (December 2025), including the updated approach to climate mitigation and adaptation. Ahead of submission, the Council must ensure that CL4 reflects the revised national expectations on carbon reduction, resilience and wider climate obligations.

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.

28. Review and update CL4 to align with the revised NPPF climate policies prior to submission.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

29. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.