

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"/>
First Name	<input type="text" value="Matthew"/>	<input type="text"/>
Last Name	<input type="text" value="Skinner"/>	<input type="text"/>
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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"/>	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.

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 Plan requires that space is provided for a community use facility at Site 316, which could include, for example, a pharmacy. This is welcomed in principle.

However, the policy as drafted does not provide sufficient certainty regarding:

the form, function, or scale of the facility;

whether it will operate as genuinely accessible community infrastructure;

the timing of delivery relative to housing occupation;

whether the facility will be delivered in a usable, operational condition rather than as an unfitted shell; or

the long-term stewardship and accessibility of the space for local residents.

Given the scale of growth proposed—representing a population increase of over 30%—the absence of clear delivery, usability, and community governance expectations creates a risk that the required space does not translate into effective social or health infrastructure in practice.

Accordingly, the Plan cannot be shown to be:

effective, as meaningful community provision is not secured with sufficient certainty; or

fully consistent with policies requiring development to be supported by appropriate and accessible community infrastructure.

(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 Site 316 policy wording and/or supporting text to:

explicitly require the community facility to be of a scale and function that addresses identified local needs (such as Class E medical/health or Class F.2 community use), preventing the delivery of generic units that do not serve the specific needs of the expanded population;

require strategy that links delivery of the facility to a specific stage of housing occupation, early in the development, in step with housing occupation;

require a plan is approved prior to development on how the building will be finished to a specification that enables immediate occupation (avoiding an empty shell) and how it will be managed.

secure long-term community accessibility and stewardship, for example through transfer to, or management by, the Parish Council or another locally accountable community body, supported by appropriate maintenance arrangements.

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Participation in the hearing sessions is necessary because my representations raise specific issues of soundness relating to infrastructure delivery, policy precision, and the effectiveness of mitigation for a large site allocation at Long Lawford.

In particular, the representations address whether the Plan is positively prepared, justified, and effective in securing timely community and health infrastructure, appropriate transport mitigation, and clear delivery mechanisms through policy wording and Section 106 obligations.

These matters require examination through discussion of evidence, viability, and implementation, which cannot be fully explored through written representations alone. Attendance at the hearing would therefore assist the Inspector in determining whether the Plan provides a sound and deliverable framework for sustainable growth at Long Lawford.

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The Plan provides limited certainty that key infrastructure will be delivered in step with housing occupation.

Where infrastructure delivery is deferred, impacts on existing services and residents occur immediately while mitigation is delayed.

Without clear phasing expectations, the allocation risks failing the Effectiveness test, as sustainable development depends on timely infrastructure provision.

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Amend policy and/or supporting text to require:

strategy to be submitted prior to development that demonstrates how delivery of key mitigation and community infrastructure aligns with housing development;

use of appropriate phasing or trigger mechanisms within planning obligations to ensure timely provision.

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Name or Organisation:

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Site ID	316				

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The allocation of approximately 650 dwellings at Long Lawford is not justified or effective in relation to primary education provision.

Long Lawford Primary School's Published Admission Number was formally reduced from 90 to 60 in 2022 due to operational and physical constraints. The Council has confirmed that this reduction is reflected within its pupil yield modelling.

However, the Regulation 19 Plan does not clearly demonstrate:

that sufficient primary school capacity exists to accommodate the scale of growth proposed; nor

how any additional capacity required would be secured, funded, and delivered in a timely manner.

If the strategy relies on exporting primary-aged children to schools in Bilton/Cawston (as implied by the Site 253 "safe route" requirement), this contradicts Policy S1 (sustainable settlements) and NPPF para 104 by enforcing long-distance travel for essential services, increasing reliance on private cars for school runs

Without clear evidence of deliverable education capacity, the allocation relies on uncertain infrastructure provision and therefore fails:

the Justification test, as the evidence does not robustly demonstrate capacity; and

the Effectiveness test, as no secured delivery mechanism is identified.

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

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Amend the policy and supporting text for Sites 316 and 253 to:

demonstrate that any required expansion of Long Lawford Primary School is physically feasible;

require the safeguarding of land sufficient to accommodate a 1FE Primary School in accordance with Department for Education (DfE) Building Bulletin 103 standards. This land shall only be released for residential use if the Local Education Authority categorically proves that off-site expansion at Long Lawford Primary is deliverable;

require developer-funded mitigation to address primary education demand arising;

secure delivery of additional capacity prior to, or in step with, occupation of the development.

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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"/>	Policies Map	<input type="text"/>
Site ID	316 AND 253				

4. Do you consider the Local Plan:

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The Plan does not adequately demonstrate that traffic impacts arising from the proposed allocations at Long Lawford will protect the living conditions of existing residents along the A428 (Coventry Road).

A significant number of existing dwellings front directly onto this route.

Changes in traffic flow associated with development—particularly increased stop-start movements, queuing, and vehicle idling in close proximity to residential frontages—have the potential to result in:

increased noise and disturbance;

poorer local air quality exposure; and

reduced residential amenity for established households.

Transport evidence typically focuses on overall network capacity and junction operation.

However, the Plan provides limited clarity on how amenity impacts on existing frontage housing would be assessed or mitigated where traffic conditions change in character rather than simply in volume.

In the absence of clear expectations regarding the avoidance or mitigation of these impacts, the Plan cannot be shown to be:

effective, as the consequences for existing residents are uncertain; or

fully consistent with national policy, which requires development to ensure safe and suitable access and to protect residential amenity from unacceptable noise and air quality effects.

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Amend the policy and/or supporting text relating to the Long Lawford allocations (Sites 316 and 253) to require that:

transport assessment, modelling and access design explicitly consider impacts on residential amenity for existing properties fronting the A428, in addition to highway capacity and junction performance;

development proposals demonstrate that junction design, traffic management, and mitigation measures will minimise stop-start queuing, prolonged idling, and associated noise or air quality effects adjacent to existing homes; and

where such impacts cannot be avoided, appropriate mitigation measures are secured through planning obligations or conditions.

These amendments are necessary to ensure the Plan is effective and consistent with national policy on residential amenity and environmental quality.

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