

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="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Heather"/>	<input type="text"/>
Last Name	<input type="text" value="Timms"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
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Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>
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(where relevant)

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?

Local Plan Paragraph	146 - 147	Local Plan Policy		Policies Map	
Site ID	121				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	
(2) is Sound	Yes		No	No
(3) complies with the Duty to co-operate	Yes		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.

The plan is unsound in the allocation of this site as it is green belt and special circumstances have not been demonstrated. Also the need for employment land has not taken into consideration land allocated close to Rugby town in the East Midlands. There is a site on the A5 which was in the Section 18 which is closer to the Rugby town and would unlock additional road network monies.

This site was added at the section 19 stage and therefore I do not believe that paragraph 16© had been adequately met with public engagement.

The site was not allocated in the last local plan because of its proximity to an SSSI and heritage assets (the inspector used specific wording to say why it was not being included). Paragraph 192, 198, 198C, and 203 of the plan has not been fully taken into account on this site.

The inclusion of a gipsy and traveller site at this location has also not been fully justified when there are no gipsy and traveller site allocations in similar sites nearer to the most sustainable location of Rugby town.

(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.**

Removal of this site from the plan and replacement of one which is not in the green belt and would unlock road and transport allocations being nearer to the most sustainable location of Rugby town.

(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

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:

To fully outline why this site should be removed from the plan

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.

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.

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(where relevant)

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?

Local Plan Paragraph		Local Plan Policy		Policies Map	S1 and S5
Site ID	54				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	
(2) is Sound	Yes		No	No
(3) complies with the Duty to co-operate	Yes		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.

Site 54 already has planning permission for 54 houses. The concern that I have is the changes to the settlement boundaries as which include taking additional land out of the green belt under the policies map because there are no special circumstances to demonstrate the requirement to remove the land from greenbelt

This site was added at the section 19 stage and therefore I do not believe that paragraph 16© had been adequately met with public engagement.

(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.

Removal from the plan of the additional land outside of site 54 being taken out of the green belt.

(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.

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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)

Yes

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:

To fully outline why additional land should not be removed from the greenbelt

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.

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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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	W! <input type="text"/>	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	No
(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.

This policy has been entirely constructed in order to provide protection for Brandon stadium over and above what it already has via the NPPF. The response I sent to the preferred option was "the policy with regard to Brandon Stadium appears to conflict with NPPF and has implications for other sports stadia within the borough. The current planning status of the stadium is as a sports ground (not a motor sports ground) and therefore using it provide something more inclusive and future facing (rather than a dying sport as evidenced nationally) would be more appropriate.

Following this submission other sports centres were included and the policy amended to provide a more general approach.

The stadium's official status is as a sports stadium (not a motor sports stadium) and this has been confirmed by its use as a greyhound racing stadium and a barrister's opinion obtained by RBC.

It is also unsound as it proposes community uses on the Brandon stadium for which there are no existing planning permissions granted so it is providing additional protection which is not in compliance with the NPPF

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

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Removal from the plan of the additional land outside of site 54 being taken out of the green belt.

Removal from the plan of all named sports stadium and the general terms applied.
Complete removal of paragraph B as there are no planning permissions granted on the site for community purposes.

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

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

To fully explain why the plan is unsound on the grounds that it exceeds the protections afforded by the NPPF

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