

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.*

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

E-mail Address

(where relevant)

2. Agent's Details (if applicable)

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	EN1	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" 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 checked="" type="checkbox"/>	No	<input type="checkbox"/>

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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Our representations on the Preferred Options Local Plan highlighted that the Local Wildlife Site boundaries identified on the policies map in the Houlton area did not represent actual features on the ground and in many instances coincided with either existing built development or areas identified within the approved Outline Planning Permission (OPP) for development. This has been raised with RBC officers and the LWS team, who will be undertaking surveys in 2027 to establish the correct extent of LWS boundaries within Houlton.

However, until this is rectified Urban&Civic wish to reiterate the risk that policy EN1, in combination with the incorrect boundaries shown on the Proposals Map may pose on the continued development of Houlton in accordance with the OPP, which is a key pillar of the proposed Local Plan growth strategy. As currently drafted, EN1 precludes development proposals on LWSs unless strict criteria are met, meaning that where a LWS is shown e.g. in the District Centre at Houlton, there is a risk that the policy prevents development from being delivered. In discussion with RBC officers on how to overcome this issue, it was suggested that EN1 could be amended to allow for development as permitted via the OPP to be exempt from this policy, thereby maintaining its effectiveness as a policy without compromising the delivery of approved development.

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 EN1 (c) to read:

Development (**not already permitted through an extant outline planning permission**) likely to result in harm to or the loss of a Local Wildlife Site, Local Nature Reserve, or Local Geological Site will not be permitted unless...'

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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, I wish to participate in hearing session(s)

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To represent Urban&Civic's interests in the continued delivery of Houlton

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Part A

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2. Agent's Details (if applicable)

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	S6	Policies Map	
Site ID	338				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" 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 checked="" type="checkbox"/>	No	<input type="checkbox"/>

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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.

Urban&Civic wish to support the proposed allocation (ref:338) of land south of Crick Road for residential development. The site forms part of the wider Houlton development area and is well placed to accommodate sustainable residential development as part of this growing community, in a highly sustainable location adjacent to the approved Parkway Station.

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

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To represent Urban&Civic's interests in the proposed allocation of land south of Crick Road (ref: 338)

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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Site ID	338				

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Urban&Civic support the proposed allocation of site 338 for residential use and offer the following detailed comments on the draft allocation wording:

- Boundary – the red line boundary embedded within the policy text does not align with the Proposals Map. The latter is correct and matches the boundary provided at Preferred Options stage. The former should therefore be updated to reflect the correct site boundary.
- Development requirement 1 is for the creation of a pedestrian access to the new Parkway Station. As identified in our Preferred Options representations, the Houlton OPP already secures a pedestrian/cyclist link running along the Crick Road (A428) that will provide a direct active travel connection to the new station. This is consistent with the Rugby Parkway station proposals which also envisage a north-south pedestrian/cyclist link across the A428 connecting from Station Avenue to the station. In this context, the proposed allocation site will be well-connected to the station via the A428 active travel route, such that a second connection is not necessary. On the basis that this draft allocation criterion has not been adequately justified and therefore isn't sound, it should be removed.
- An additional requirement is included (final bullet) for contributions towards cycle route network improvements identified in the LCWIP (R22, R23, R24). Such contributions have not been justified within the policy and are therefore unsound. These routes are either within or required as part of the Houlton or DIRFT developments already approved (R22 and R23) or so far removed from the site (R24) as to not be justified as being required to mitigate impacts generated by the development. This criterion should therefore be removed.

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Amend site boundary within policy text to align with Proposals Map.

Remove criterion 1 (first bullet) requiring pedestrian connection to Parkway Station

Remove criterion 6 requiring contributions to LCWIP schemes

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

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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 represent Urban&Civic's interests in the promotion of proposed allocation 338 Land South of Crick Road

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Part A

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2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text" value="Mrs"/>
First Name	<input type="text" value="Mike"/>	<input type="text" value="Helen"/>
Last Name	<input type="text" value="van den Berg"/>	<input type="text" value="Armes"/>
Job Title (where relevant)	<input type="text" value="Project Director"/>	<input type="text" value="Planning Partner"/>
Organisation (where relevant)	<input type="text" value="Urban&Civic"/>	<input type="text" value="David Lock Associates"/>
Address Line 1	<input type="text"/>	<input type="text" value="50 North Thirteenth Street"/>
Line 2	<input type="text"/>	<input type="text" value="Milton Keynes"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	W2	Policies Map	x
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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The proposals map identifies open spaces that relate to policy W2. However, these are not cross referred to directly in the policy wording and so it is not clear which element of the policy applies to these sites. Further, the reference to national policy on the protection of open spaces (which we assume is the relevant part) requires further clarity to be effective i.e. which policies are being referred to exactly. There is a cross reference in W2 to compliance with W1 which relates to community facilities. The supporting text notes that such facilities can include outdoor sports facilities but doesn't include any other areas of open space. So, with the exception of sports facilities, this policy wouldn't seem to apply to open space. This cross reference is therefore confusing and not effective and should either be clarified or removed.

Furthermore, the identification of existing open spaces at Houlton does not align with what has been constructed, as identified in plans provided at the Preferred Options stage. These need to be amended to reflect the reality on the ground. It is also unnecessary for the Proposals Map to add names to individual open spaces at Houlton which don't align with real place names, and in any event serve no purpose.

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Reword the final bullet point of policy W2 to cross refer to proposals map and make clear which national policies apply specifically.

Amend open spaces within Houlton to match existing (as per previously provided GIS file, also attached now for reference) and remove unnecessary and erroneous open space names

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