



Our Ref: P2063/SH/hr
Date: 13th March 2026

Proposed Submission Consultation
Development Strategy Team
Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 1RR

4 Brindleyplace
Birmingham B1 2LG

T 0121 455 9455
E info@harrislamb.com

www.harrislamb.com

BY EMAIL ONLY: localplan@rugby.gov.uk

Dear Sir/Madam

**Rugby Local Plan Regulation 19 Consultation
Representations on Behalf of Vistry Group**

Harris Lamb Planning Consultancy (“**HLPC**”) are instructed to submit representations to the Rugby Borough Local Plan Regulation 19 Consultation by Vistry. Please find attached to this letter a series of completed representation forms. It is our view that significant aspects of the emerging Plan are unsound, and require revising accordingly.

As you are aware, it is the Government’s objective to try to build 1.5 million homes during the course of this Parliament. The National Planning Policy Framework of December 2024, and the consultation draft NPPF, make it clear that it is the Government’s intention to significantly boost the supply of housing. Indeed, the Ministerial Statement from Matthew Pennycook that accompanied the consultation draft Framework advises that England is in the “grip of a housing crisis that is both acute and entrenched”. The Government are making changes to the planning system to address the housing crisis. It is, therefore, extremely disappointing that whilst the Preferred Options version of the Rugby Local Plan proposed the development of 12,978 dwellings, the pre-submission version of the Plan reduces this to 10,812 dwellings. This is clearly a backward step in supporting housing delivery, it is not reflective of Government policy. Furthermore, the draft Plan includes numerous policies that simply state that development should be undertaken in accordance with legislation and the NPPF. Dual regulatory control should be avoided. These policies should be deleted.

I trust you will find our representations useful. We welcome the opportunity to discuss this further with Officers if that is of assistance.

Yours faithfully



NOTTINGHAM
0115 947 6236
STOKE-ON-TRENT
01782 272555

TELFORD
01952 979 530
WORCESTER
01905 22666



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

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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" value="Mr"/>
First Name	<input type="text" value="Joel"/>	<input type="text" value="Simon"/>
Last Name	<input type="text" value="Merris"/>	<input type="text" value="Hawley"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>
Address Line 1	<input type="text" value=""/>	<input type="text" value=""/>
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Telephone Number	<input type="text" value=""/>	<input type="text" value=""/>
E-mail Address (where relevant)	<input type="text" value=""/>	<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	Objectives	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.

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 pre-submission draft Plan identifies 6 overarching objectives on page 6. These objectives are all supported in principle. The Council should be looking to support and diversify the growth of the Borough's economy, support the revival of the town centre, raise design standards and support green measures. There is, however, no reference whatsoever in the objectives to supporting the delivery of housing.

It is a clear national Government policy to increase rates of house building. This is explicit in both the adopted and emerging version of the Framework. It is a fundamental role of the planning system. It is, therefore, a failure of the Plan not to acknowledge this within its objectives. The objectives should draw upon the stated aims of the Framework, and confirm that it is the Plan's objective to significantly boost the supply of housing within the Borough.

(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.

The objectives of the Plan should be revised to make reference to significantly boosting the supply of housing to meet the needs of present and future generations in accordance with the requirements of the Framework.

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

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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)

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:

It is our view that the Plan's housing requirements is insufficient, and there is insufficient number of residential allocations. This is a significant shortcoming and is reflected by the objectives failing to recognise the important role the Local Plan will have in housing delivery. We would, therefore, like to attend the examination to discuss this matter further given the critical nature of housing delivery.

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 applicable.

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Part A

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E-mail Address (where relevant)	<input type="text" value=""/>	<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		Local Plan Policy	CL1	Policies Map	
Site ID					

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"/>

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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.

Policy CL1 – Net Zero Buildings, should be deleted.

Significant parts of Policy CL1 duplicate building regulations. Furthermore, aspects of the policy are entirely impractical. For example, Part ii of the policy requires new buildings, including houses, to be “fossil fuel free”. Mains electricity uses fossil fuels. Part ii of the policy effectively prevents new residential developments from being served by mains electricity.

For example, a speculative commercial building could be tenanted by a low or high energy uses. This may not be known until after the building is built.

Part iii of the policy requires schemes of one or more dwellings to “generate at least the same amount of renewable electricity on site as the electricity they demand over the course of a year”. This is unenforceable. There is no way of knowing what the energy requirement of certain industry buildings will be.

It is also noted that none of the requirements in Policy CL1 have been viability tested as required by the Planning Practice Guidance. It is likely that the requirement of Policy CL1, in combination with other policy obligations will make developments unviable.

(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 CL1 should be deleted. There is no evidential basis or overarching policy provision for its inclusion within the Plan and it has not been viability tested.

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

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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:

We would like to attend the examination given the adverse impacts that the requirements of Policy CL1 could have on the deliverability of allocations and the viability of developments generally.

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 applicable

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Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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	CL3	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"/>
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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.

Policy CL3 should be deleted. The policy is ambiguous, and other parts such as the section on water consumption rates, are a matter for building regulations.

The policy is imprecise and cannot be applied. It advised that new development shall "minimise" the need for new infrastructure by being located where there is adequate water. The term "minimise" is not defined. Furthermore, if this approach were correct it is a matter for the allocation of sites, not for the determination of planning applications. If it is the Council's intention to ensure that residential development takes place in areas with appropriate water infrastructure this should be reflected in the choice allocations themselves. It is not a development control matter.

In any event, no developer would provide a scheme that is not adequately served by water as it would be inoperable / unoccupiable.

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

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Policy CL3 should be deleted.

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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)

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:

We would like to appear at the examination given the imprecise nature of Policy CL3 and the impact it could have on the delivery of sites.

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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Not applicable

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Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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	CL4	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.

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.

Part A.2 of Policy CL4 – Climate Adaption, should be deleted. This section of the policy requires the design of green spaces to be “optimised to provide urban cooling and managing local flood risk”. Whilst this objective is supported, it is a mandatory requirement for all development to provide 10% BNG, which would typically be provided through the development of green spaces on site. The provision of BNG on site will have direct implications for the location and layout of the green spaces. For example, it may well be the case that the development needs to be designed to minimise biodiversity impacts on particular sections of the site to deliver 10% BNG and this approach may not be compatible with the optimal approach to providing green space through urban cooling.

(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 CL4 – Climate Adaption, should be revised so that the role of BNG is recognised in the provision of green space as part of development proposals.

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

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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:

Policy CL4 has the potential to adversely affect the deliverability of residential allocations. We would like to attend the examination to discuss this matter further.

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	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.

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.

Parts A and B of the policy should be deleted. Part A requires developments to comply with national policy and legislation. This does not need to be referenced in policy. Legislation and national planning policy provides clear guidance and criteria on their statutory status the way they should be applied in the decision making process. By way of an example, the National Planning Policy Framework will carry the same weight in the decision making process, regardless of whether or not this is specified in Policy EN1.

(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.

Parts A and B of Policy EN1 should be deleted.

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

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

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**Name of the Local Plan to which
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Submission Local Plan

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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" value="Mr"/>
First Name	<input type="text" value="Joel"/>	<input type="text" value="Simon"/>
Last Name	<input type="text" value="Merris"/>	<input type="text" value="Hawley"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>
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Post Code	<input type="text" value=""/>	<input type="text" value=""/>
Telephone Number	<input type="text" value=""/>	<input type="text" value=""/>
E-mail Address (where relevant)	<input type="text" value=""/>	<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	EN5	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.

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.

Policy EN5 – Biodiversity Net Gain should be deleted. It simply repeats the requirement of the Environment Act 2011. Dual regulatory control should be avoided. Furthermore, it is entirely possible that during the course of the Plan period that provisions of Part 6 in the Environment Act may be amended and would render this policy out of date. Referring to the use of statutory credits as a “last resort” is inappropriate. Acquiring credits where necessary is an entirely appropriate approach to addressing BNG in accordance with the mitigation hierarchy.

(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 EN5 should be deleted.

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

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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 emerging Plan includes a series of policies that simply repeat legislation and national planning policy guidance. This over-complicates the Plan, and will cause confusion as part of the determination of planning applications. We would like to attend the examination given the significant impact of these policies.

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 A

1. Personal Details*

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2. Agent's Details (if applicable)

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First Name	<input type="text" value="Joel"/>	<input type="text" value="Simon"/>
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Job Title (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>
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Telephone Number	<input type="text" value=""/>	<input type="text" value=""/>
E-mail Address (where relevant)	<input type="text" value=""/>	<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	EN6	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.

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.

Policy EN6 should be deleted. There is no policy or evidential basis for requiring 20% canopy cover. This policy has not been tested to see how canopy cover would effect potential BNG provision on site. It has not been viability tested. The implications of the policy on the net developable area of sites has not been considered.

(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 EN6 should be deleted given the lack of any evidential basis for the policy, and due to the fact its implications have not been fully considered in terms of BNG impact, gross to net development ratios or viability.

(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, 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:

Policy EN6 has the potential to have significant adverse impacts on the development of allocations. We would like to attend to the examination to express our concerns to the Inspectors.

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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Not applicable

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Part A

1. Personal Details*

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Telephone Number	<input type="text" value=""/>	<input type="text" value=""/>
E-mail Address (where relevant)	<input type="text" value=""/>	<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		Local Plan Policy	EN7	Policies Map	
Site ID					

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.

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.

Policy EN7 – Flood Risks, Parts A and B, simply repeats national planning policy. The Local Plan should not simply reiterate the requirements of the Framework.

Part C of the policy states that no development should take place within 8 metres of the edge of watercourse or main river. There is no policy basis for this approach. Indeed, built development, in the form of culverts for drainage or other infrastructure may be required within 8 metres of the edge of a watercourse.

The policy should be deleted.

(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 EN7 should be deleted from the Plan. It is not appropriate for a policy to simply repeat the requirements of the National Planning Policy Framework. There is no basis or rationale for the policy seeking to prevent development within 8 metres of a watercourse or main river.

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

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

Policy EN7 is unjustified, impractical and has the potential to have significant implications for development in close proximity to watercourses. Given the significant implications of this policy we would like to attend the examination in order to explain our concerns to the Inspector.

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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Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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	H1	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.

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.

Policy H1 advises that new housing developments should contribute towards meeting the housing needs of the Borough as identified by the Housing Needs Evidence (2025) Report. As referred to in our response to Policy S1, the housing requirement in the Plan effectively ignores the guidance contained in the HNE on the need for affordable housing. As drafted the affordable housing requirements identified by the HNE will simply not be met without a significant increase to the housing requirements. The Plan fails the stated aim of Policy H1 of new developments "contributing to the housing needs of a Borough as identified in the Housing Needs Evidence".

Policy H1 provides mix requirements for market housing and affordable housing schemes. This draws upon the Housing Needs Evidence report. The policy should be amended to advise that whilst the Housing Needs Evidence report is a material consideration in the determination of planning applications, it should not be applied rigidly.

The conclusion of the Housing Needs Evidence report, are Borough wide and should be applied on that basis. There will be high density flatted schemes in the town centre that will inevitably provide predominantly one and two bedroom dwellings. Understandably, there will be no requirement for developments of this nature to provide 3 and 4 bedroom dwellings as it will be entirely impractical to do so within flatted accommodation. As schemes of this nature will have a bias towards smaller properties, suburban schemes will therefore have to have a bias towards larger properties (3 and 4+ bedrooms) if overall mix is to be met across the Plan area.

Furthermore, the HNE evidence is a snapshot in time. The emerging Plan is meant to have a Plan period that extends beyond 2040, whereby mix requirements could have changed significantly. The policy therefore needs to be flexible to accommodate a change in circumstances. There may also be design requirements, such as the presence of conservation areas, impact upon the scale and nature of development to allow this to be taken into consideration.

(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 H1 should be amended to allow for flexibility over mix depending upon local circumstances.

(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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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:

We would like to attend the examination given the significant implications the mix will have on the viability of schemes.

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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Telephone Number	<input type="text" value=""/>	<input type="text" value=""/>
E-mail Address (where relevant)	<input type="text" value=""/>	<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	<input type="text" value="H2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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Policy H2 requires between 20% and 40% affordable provision depending on the nature of the site. This is significantly below the 75% provision that the Housing Needs Evidence for Rugby Borough (September 2025) ("**HNE**") updated report suggests should be provided. The affordable housing requirements in Policy H2 are viability led, as the affordable housing need identified by the HNE is entirely unachievable.

This further emphasises the need for the overall housing requirement to be increased to support affordable housing delivery. The greater the housing requirement, the greater the number of affordable dwellings provided as a percentage of development proposals.

(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.

Additional text should be included within the policy's reason and justification to explain that the affordable housing requirements of the policy are viability driven, and the level of affordable housing in the Borough that will be generated through Policy H2 will not meet the identified affordable housing needs.

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

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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)

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:

Affordable housing delivery is a key role of the Plan, and has adverse implications for the housing target. We would like to attend the examination to discuss this critical issue.

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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Not applicable

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

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**Name of the Local Plan to which
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Part A

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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	<input type="text" value="S1"/>	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 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.

We support the identification of Wolvey as a "Main Rural Settlement" in the Settlement Hierarchy. Wolvey is a sustainable location for development with a range of services and facilities and it should be a focus for growth.

Whilst Policy S1 – Settlement Hierarchy, recognises the status of Wolvey as a Main Rural Settlement the Plan's housing delivery policies fail to build upon this and an insufficient amount of allocations are made at Wolvey to support its growth requirements.

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

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E-mail Address (where relevant)	<input type="text" value=""/>	<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	<input type="text" value="S2"/>	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" value="✓"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
(3) complies with the Duty to co-operate	Yes	<input type="text" value="✓"/>	No	<input type="text"/>

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We object to the proposed housing requirement of 10,812 dwellings, the suggested length of the Plan period and have a series of concerns with the various sources of housing supply identified in the table in Policy S2.

The Standard Method Housing Requirement

Paragraph 62 of the Framework advises that in order to determine the “minimum” number of homes needed, strategic policies should be informed by a local housing needs assessment conducted using the Standard Method set out in the PPG. In addition to the local housing needs figure any additional needs that cannot be met within neighbouring authority areas should also be taken into account in establishing the housing requirement.

Policy S2 is based on the provision of 636 dwellings per annum. This is reflective of the minimum Standard Method figure. It is the responsibility of the Council to consider whether the local housing needs figure should be greater than the Standard Method reflecting its minimum status. This has not been done.

The Council’s “Housing Need Evidence for Rugby Borough” final draft report of September 2025 advises that there is a requirement for 474 affordable dwellings per annum in Rugby. This is the equivalent of 75% of the total Standard Method rural housing requirement. It is advised at paragraph 1.8 of the HNE, is in a context which the affordable need “may not be met in full” evidence supports the prioritisation of rented products.

It is evident that the affordable housing need will not be met in full. Whilst this may have implications for the tenure of affordable housing the starting point for the plan making process is to explore ways within which additional affordable housing can be provided to meet identified needs. This includes uplifting the Standard Method housing requirement to increase the amount of affordable housing that will be provided on qualifying sites that will provide affordable dwellings through planning obligations.

Paragraph 63 of the Framework advises that within the context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This includes those who require affordable housing. The emerging Plan fails this requirement. There is clearly a need for the housing requirement to be uplifted to support the delivery of affordable housing.

Furthermore the HEA identifies a need for 515 care units. The Standard Method housing calculation is a dwelling stock based calculation. It does not consider the need for care accommodation in its calculation. Indeed, if the care units fall within Use Class C2 it will be omitted from the calculation altogether. The Plan should, therefore, give consideration to uplifting the housing requirement by 515 dwellings to deliver additional care units as a discreet element of the housing supply.

Policy S2 also fails to take into consideration the demographic changes taking place in Rugby and the implications they have for the workforce and the growth of the economy.

Paragraph 4.24 of the draft Plan advises that 47% of projected population growth in Rugby is expected to be in the age groups of 55 years and over. There is projected to be a decrease in the number of children. There will be modest growth in the 16 to 64 age group. As a consequence, over time, the population in the District will change so there is a significantly greater number of older residents not of working age compared to those of working age. This will place a significantly increased burden on the working population to supporting older age groups. Consideration should be given to uplifting the housing requirement to help deliver the Plan's economic growth objectives by ensuring there is a sufficient people of working age to support economic growth.

As well as meeting Rugby's own housing needs the Borough may have a role to play in supporting the housing growth of other neighbouring authorities. There is no reference in the Plan as to how this has been considered.

The Plan period has been reduced by 3 years compared to the Preferred Options Consultation Draft Plan. This has resulted in a significant reduction in the housing requirement from 12,978 dwellings per annum to 10,812 dwellings per annum. There is no good reason for reducing the Plan period, and the amount of houses to be planned for. The proposed approach works directly against the Government's objection of boosting the supply of housing by reducing the number of allocations in the Plan.

Neither the Preferred Options or pre-submission version Local Plan contained any phasing arrangements. That being the case, whilst the Preferred Options of the Plan had a longer plan period, it was prepared in such a way that planning permission could be granted for any of the proposed allocations in the short term, resulting in significant levels of development towards the beginning of the Plan period. Whilst Policy S6 of the Preferred Options Consultation Draft Plan included a series of allocations capable of providing 3,338 dwellings, this is reduced to 2,886 dwellings in the pre-submission Plan. The inevitable consequence of this is a reduction in the short term of housing delivery.

We are also concerned that Policy S2 seeks to rely upon the delivery of 205 dwellings from "other allocations in the Local Plan". These are allocations without the benefit of planning permission. Given that these sites have benefitted from an allocation in the adopted Local Plan but have not come forward for development, their deliverability is in question. There is no reason to believe that these sites will come forward for development now if they have not already. They should be removed as a source of supply.

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

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The following changes are required to the policy:

- The minimum standard to meet the housing figure should be increased to assist in the delivery of affordable housing and to support economic growth.
- Consideration should be given to increasing the housing requirement to help meet any needs arising from neighbouring authorities.
- The plan period should be extended to 2045.
- The identified sources of housing land supply should be critically reviewed and previously undelivered Local Plan housing allocations should be deleted.
- Additional housing allocations should be made to meet the revised housing requirement.

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

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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:

The housing requirement in the emerging Plan has significant flaws for the reasons referred to above. The delivery of housing is a critical matter for the emerging Plan. We would like to attend the examination to address this matter further and discuss the revisions required to the policy in order for the Plan to be made sound.

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	<input type="text" value="S6"/>	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" value="✓"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
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Policy S6 should be amended to include additional allocations in response to an increased housing requirement (please see our response to Policy S1). Vistry's land interest at Wolvey that was identified as Site 84 – Land south of Leicester Road, Wolvey, in the Preferred Options version of the Plan should be reinstated.

The Cabinet Committee Report that accompanies the pre-submission draft Local Plan explains the rationale for the removal of Vistry's site from the pre-submission Plan at paragraph 9.1. It states:

“The proposed allocation south of Leicester Road is removed, while the allocation at Coventry Road, Wolvey is reduced in scale from 500 homes to 60 homes. This reduces the number of new homes planned in the village to 210. The allocation south of Leicester Road is more removed from the village centre in comparison to the other site options and has greater historical sensitivity given its proximity to St John the Baptist Church. Additionally, the proposed off road walking route from land south of Leicester Road to the village centre crosses the River Anker flood plain and so would unlikely be a year round option.”

This rationale does not stand up to scrutiny. The proposed allocation immediately adjoins the Countryside Kingsmaker View development. This site was an allocation in the adopted Local Plan and has been granted planning permission by the local authority for residential development. The proposed allocation would effectively extend the eastern edge of the Kingsmaker View development by approximately 140 metres. Given that it has been concluded that the Kingsmaker View scheme is in a suitable and sustainable location with appropriate sustainable access to services and facilities, the same must be true of the Vistry site.

In terms of its heritage sensitivity, the proposed allocation is further away from St Johns the Baptist Church than the Kingsmaker View development. Again, the Kingsmaker View development would not have been granted planning permission if there had been an adverse impact on St Johns the Baptist Church. The Kingsmaker View development is, at its closest point, approximately 160 metres away from St Johns the Baptist Church, where land south of Leicester Road is, at its closest point, more than 270 metres away.

It is suggested that the off road walking route is inappropriate as it crosses the River Anker flood plain meaning that it would be unlikely to be used all year round. Residents of the development could use the footpath on the Leicester Road in Churchill to access the village, in exactly the same way as the results of the Kingsmaker View development. This is not, therefore, a constraint to development.

The allocation of the Vistry site can bring a significant number of benefits to the village that other allocations will not. This includes, as detailed in the Preferred Options version of the Plan, a large riverside walk and nature park, children's play areas, improved pedestrian links, public rights of way and enhancements and significant wider public open space and ecological benefits. This opportunity will be lost without the allocation of the site.

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

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The land south of Leicester Road allocation should be reinstated. It is suitable, sustainable and a deliverable housing site which is required to meet the Plan's revised housing requirement. Its omission is a significant shortcoming of the Plan.

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

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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:

The omission of the land south of Leicester Road, Wolvey is erroneous. This site is required to meet the Plan's revised housing requirement and to deliver significant benefits to the development of Wolvey beyond residential development. The site provides the opportunity to deliver significant open space, green infrastructure and ecological benefits.

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Name or Organisation:

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	CL3	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"/>
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Policy CL3 is unenforceable. It seeks to prevent the loss of ground floor retail units which were or were last in a main town centre use unless replacement units are provided or it is demonstrated there is no reasonable prospect of the retention of the main town centre use. A permitted development rights can be used to repurpose buildings in Use Class E for other uses. The policy in a Local Plan cannot revoke or disengage parts of the GDPO. The policy is ineffective.

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

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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:

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 applicable

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>