

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="Paul"/>	<input type="text"/>
Last Name	<input type="text" value="Waller"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="none"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="none"/>	<input type="text"/>
Address Line 1	<input type="text" value="████"/>	<input type="text"/>
Line 2	<input type="text" value="████████████████"/>	<input type="text"/>
Line 3	<input type="text" value="████████"/>	<input type="text"/>
Line 4	<input type="text" value="████████"/>	<input type="text"/>
Post Code	<input type="text" value="██████"/>	<input type="text"/>
Telephone Number	<input type="text" value="none"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="████████████████"/>	<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	Infrastructure	Policies Map	Proposed Submission Policies Map - Dunchurch
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

I can only speak for the needs of Dunchurch. The VILLAGE is deprived of open recreation space suitable for use by ALL ages of local residents and visitors.

National Planning Policy Framework Paragraph 88.

"Planning POLICES and DECISIONS should ENABLE: c) SUSTAINABLE rural tourism and LEISURE DEVELOPMENTS which respect the character of the countryside; and d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, OPEN SPACE, cultural buildings, public houses and places of worship."

National Planning Policy Framework Paragraph 83.

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

To achieve this end R.B.C. relies on report "Rugby Borough Council Rural Sustainability" December 2024.

See Para 3.13. (para-phrase)

"A settlement shall be assigned two points for each of the following desirable services that are to be found within its boundary. As with the essential services, two or more instances within the same category shall not result in additional points. However, there are variables to the scores to be gained from

dentists and libraries.

Desirable Services •Recreational open space”

If the object of the league table in Appendix A is to inform decisions to satisfy NPPF para 83 the point scoring rational is defective.

Free to Use Recreational Open space provision is at NO POINT graded in a per capita or per household manner.

As RBC acknowledge settlements such as Bretford are well provided for whilst being a very small number of households. Another such village is Shilton.

The Open Space Assessment (RBC) is admitted to be incomplete, is only on a ward by ward basis.

Actual provision in the Rural settlements is NOT QUANTIFIED. No Registered Village Greens and Common land are included from the public registers maintained by Warwickshire County Council.

Dunchurch possess four public open spaces.

a) Three registered village greens. All have a POOR recreational value. All are unsuitable for ball games, etc. All suffer from pollution, being situated adjacent to busy main roads.

b) Arkwright Recreation Ground. Donated to the care of Dunchurch Parish Council c1938, for all forms of recreation. This space was a size appropriate for child and adult use in a village of its size at that time.

Other 'open spaces' WITH RESTRICTIONS.

Rugby Borough Council changed the status of an area locally known as 'the heath' public open space to 'urban meadow'. Use for general public recreation stopped and the habitat now created I believe is under management of a wildlife trust. This can no longer be considered for general use.

Also NOT for general public use is the Dunchurch and Thurlaston Sportsfield. This is owned and managed by a trust/charity. All sports use is CHARGED for. Access is tolerated for dog walkers and a public footpath passes along the south side.

Recognising the PRESSING NEED for more recreational public open space after the rapid expansion of the population in the 1970's, Dunchurch Parish Council negotiated the rolling lease from Warwickshire County Council of land next to the new school. This served the people on south side of the main road until given up in c2015 and is now included in the Local Plan Submission as "Area of Separation".

Ideal location for open space and recreation is South and South West adjoining Dunchurch Park. A future proof solution for a public park. This is now within the 'Rainsbrook Valley Landscape of Elevated Sensitivity.

There are NO OTHER areas at this stage in the village's development which could be used.

HOWEVER. In RBC own words.

"Local Plan review - Preferred Option public consultation: evidence base.

OPEN SPACE STUDY. A study which incorporates the results of the quality audit above, quantifying the current provision of open space across the borough, proposals for updated open space standards, and how these standards can be applied to identify areas of deficiency and surplus, making recommendations about the council's approach to open space. FORTHCOMING."

The pressing requirement for recreational open space is hidden. NPPF para 83, is NOT SATISFIED.

RBC leads us to believe its evidence base is ESSENTIAL. But admit a deficiency assessing OPEN SPACE before choosing building land. This is a FAIL for the WHOLE process.

(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.

Any modification would need to be informed by a renewed Rugby Borough Council Rural Sustainability Report, taking into account my comments.

And a renewed "Wellbeing, Open Space Study Report – December 2025" (pdf date 15 December 2025) to match the rural areas to those to be used in the Rural Sustainability Report. Areas for public open space/parks and gardens do not match. The same observations on use/public/private apply.

(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, 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:

I believe my observations to be valid and don't believe they will be raised by anyone else.

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.

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>