

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 **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*

2. Agent's Details (if applicable)

**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	<input type="text" value="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Jennie"/>	<input type="text"/>
Last Name	<input type="text" value="Johnson"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Warwickshire Wildlife Trust"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>

Part B - Please use a separate sheet for each representation

Name or Organisation:

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	Environment EN1 Biodiversity and geodiversity protection	Policies Map	Yes
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Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

No

(2) is Sound

No

(3) complies with the Duty to co-operate

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.

WWT is extremely concerned regarding the housing and employment allocations actually on land and near to our important designated and potential Local Wildlife Sites, key habitat and through wider landscape corridors. The impact on these sites is not 'Justified' and would create increased traffic/lighting/noise and activity threatening vulnerable wildlife. Those sites that have only recently been added in, have not been tested by the early Sustainability Appraisal. Policy EN1D is not 'effective'-the plan needs stronger reference to the Local Nature Recovery Strategy, the word 'contribute' to isn't strong enough to deliver step change. With Government's commitment for 30% of land in nature recovery by 2030 (Environment Act 2021).

Policy EN1C is contrary to national policy and needs to refer to 'Potential Local Wildlife Sites' too and shouldn't allow caveats that allow for the loss of important designated wildlife sites. Contrary to the NERC act and these sites include legally protected species (Wildlife and Countryside act 1981).

EN1A should be more ambitious with regards to BNG and not just ask for the basic National requirements. With the Councils Climate change emergency and targets -Environment Act 2021 the Council needs to encourage over 10% as proven viable and is in 20 other adopted Local Plans.

WWT is surprised to see no Green Infrastructure plan, policy or evidence base at all within the plan, in line with the NPPF requirements. It is not enough to just rely on the LNRS without clear land locations and allocations. NPPF 2025 Para 192. states plans should:

a) 'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks'

The document also doesn't go far enough in terms of climate change, especially with the Councils declared 'Climate emergency' and the Plan should include grey water policies and street trees, as well as green roofs and sustainable technologies on bus stops and large employment sites.

The Council has made new allocation changes at this late stage with weren't tested through a SA I and included in earlier plans that were publicly consulted on.

Theres a Housing allocation next to designated Long Lawford Meadows Local Wildlife Site and directly on Lawford Heath Meadows. This is a key wildlife site home to a number of important and at risk protected species. The Councils NERC duty isn't being met.

The Newton manor lane allocation is directly adjacent to designated Local Wildlife Site -- Coton Park Pool. This is an important designated wildlife site for biodiversity and legally protected species.

Theres a housing allocation directly adjacent to the designated 'Rainsborough Valley landscape of elevated sensitivity'. This should been tested early on through a Sustainability Appraisal process.

There is now an actual Potential Local Wildlife Site Land North of Rounds Gardens, allocated for housing. This is very concerning how did a potential LWS designation pass a housing site assessment and pass an early Sustainability Appraisal assessment.

Employment -the river Avon designated LWS runs through the northern employment allocation. This is an important wider blue corridor and habitat for important protected species.

The Newton Employment allocation also includes potential Local Wildlife Site designations within the allocated site 'Gravel Works Pond and Marsh', there are few of these important sites left across the district sand these should be retained and enhanced.

WWT is still deeply concerned regarding the employment allocation directly adjoining the designated Local Wildlife Site 'Cawston Spinney'. This is significant designated Local Wildlife Site and should have been rejected at the housing site assessment stage.

The new railway designation is also within the Rainsbrook valley landscape area, which would affect the landscape character of this important wider landscape in Rugby, and inline with the plans own policy should be retained.

(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.

Those sites on potential Local Wildlife sites or next to designated Local Wildlife Sites that have only recently been added in, have not been tested by the early Sustainability Appraisal in line with an overall plan strategy and therefore need to be removed. Particularly the allocations:

- directly on Lawford Heath Meadows, The Newton manor lane housing allocation is directly adjacent to designated Local Wildlife Site --Coton Park Pool.
- The housing allocation directly adjacent to the designated 'Rainsborough Valley landscape of elevated sensitivity'.
- Actual Potential Local Wildlife Site Land North of Rounds Gardens, allocated for housing. This is very concerning. This site should be removed because of its important wildlife value.
- The Newton Employment allocation also includes potential Local Wildlife Site designations within the allocated site 'Gravel Works Pond and Marsh'.
- The employment allocation directly adjoining Local Wildlife Site 'Cawston Spinney'. This is significant designation and should have been rejected at the housing site assessment stage.
- The new railway designation is also within the Rainsbrook valley landscape area, which would affect the landscape character of this important wider landscape in Rugby.

Policy EN1D -plan needs stronger reference to the Local Nature Recovery Strategy, the word 'contribute' to isn't strong enough to deliver step change. Should be 'deliver'.

Policy EN1C needs to refer to 'Potential Local Wildlife Sites' too and shouldn't allow caveats that allow for the loss of important designated wildlife sites.

Policy EN1A should be more ambitious with regards to Biodiversity Net Gain and not just asking for the very basic National requirements. The council needs to encourage over 10% as been proven viable locally and is in 20% other adopted Local Plans.

WWT is surprised to see no Green Infrastructure plan at all within the plan, no GI evidence base or policy in line with the NPPF requirements. It is not enough to just rely on the LNRS without clear land locations and allocations. NPPF 2025 Para 192. states 'To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks'.
- Add commitment to do Green Infrastructure work, Supplementary planning document.

In terms of employment allocations the river Avon designated Local Wildlife Site runs through the northern employment allocation. This is an important wider blue corridor and habitat for important protected species, any designations should include significant buffers.

Nuneaton has recently included the following buffers in their plan as set out in 'Warwickshire Wildlife Trusts Buffer Paper' and which passed through examination these should be added into Rugby's plan; Where development proposals have a watercourse classified as a main river within their boundary, as a minimum, developers should set back development 8m from the top of the bank. The same easement will also be required on smaller watercourses to maintain water elements, ecology and wildlife corridors. Greater widths are required where forming green infrastructure, open space or ecological corridors. This includes 50m buffers for ancient woodland, 30m buffers around all semi-natural woodland and broad-leaved plantation woodland and 5m buffers either side of hedgerows'.

The document also doesn't go far enough in terms of climate change, especially with the Councils declared 'Climate emergency' and the Plan should include grey water policies and street trees, as well as green roofs and sustainable technologies on bus stops and large employment sites. There needs to be more within the policies or a supplementary planning document specifically on this important subject.

(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)

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.

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>