

From: [REDACTED]
To: Local Plan
Subject: Preferred Option Consultation
Attachments: Rugby Plan reg 18 brinklow housing send (2) (1).pdf; Brinklow-Landscape-Visual-Appraisal-final-version-text-Rev-A-101220-2T28p233r9v6.pdf; Brinklow Housing Sites Assessment Team Report.odt

Objections to the Regulation 18 Consultation from Rugby Borough Council regarding the Preferred Option Consultation Document

17th May 2025 from Brinklow Parish Council

These objections are made below on behalf of Brinklow Parish Council under four main headings as described under Items A, B, C and D.

Item A: Objection to the proposed additional housing supply in Rugby which negates the exceptional circumstances for the release of sites for housing in the Green Belt and in particular the two sites proposed in Brinklow.

This is even more the case if Rugby Council resets the end of the Plan Period to the legal requirement of 2042 rather than the proposed 2045.

In reaching this view the Parish Council are informed by the report prepared by Gerald Kells a Policy and Campaign advisor on Local Plans and previously West Midlands Regional Policy Officer of CPRE. A copy of that report, [Rugby Plan reg 18 brinklow housing send \(2\) \(1\).pdf](#), is attached to support these objections. This report also refers to the report of the Landscape Appraisal of Land West of Lutterworth Road, Brinklow, [Brinklow-Landscape-Visual-Appraisal-final-version-text-Rev-A-101220-2T28p233r9v6.pdf](#) (539 KB) which is also attached.

In his objections Mr Kells argues that the way the overall housing requirement figures are arrived at are flawed and that the numbers arrived at were in excess than they should be.

Section 2 of his report deals with overall housing need and especially highlights the different methods of assessing housing need figures and the different method of calculating that need.

Brinklow Parish Council fully support his conclusions on need as stated under paragraphs 2.66 to 2.69 and identified below.

2.66 The need figure in the Plan of 618 is based on the NSM. This appears to represent an over estimation of the genuine need which under the old SM would have been 525 dpa.

2.67 The higher HEDNA figure is also no longer applicable as it is based on assumptions that no longer apply and would lead to a less sustainable housing pattern across Coventry and Warwickshire.

2.68 The economic evidence in the HEDNA also suggests there is no need of additional housing above the NSM figure to meet economic needs.

2.69 Furthermore an adoption date of December 2026 means the end of the Plan period could be further reduced to 2042 reducing the overall need by 1,854 dwellings and alleviating pressure on the Green Belt and other sensitive sites in the countryside.”

Section 3 refers to overall housing supply and we note the points made under paragraphs 3.1 to 3.14 in which the assumed housing supply figure of 14,232 dwellings for the plan periods as indicated under Policy S2 is 9% above the existing housing requirement and there is a lack of evidence to support the reasons for this.

Objection is also made to Policy S6 which contains a breakdown of the sites newly allocated in the plan two of which relate to Brinklow.

Paragraph 3.62 refers to “the issue on relation to supply as to whether adjacent local authorities are in a position to help meet housing need, something also identified in Para 147 of the NPPF when considering Green Belt releases.”

In this case the situation in Coventry is the most significant and as identified under paragraph 3.69 “Rugby should now specifically approach Coventry to discuss whether some of its housing provision can meet Rugby’s increased need” This would negate the need to find those numbers of housing in Rugby’s green belt land that included Brinklow.

Paragraph 3.73 to 3.75 conclude that this would significantly reduce the need for additional housing to be identified in the Green Belt and specifically negate the need for the two housing sites Brinklow West Farm/Home Farm 75 dwellings and Brinklow South for 340 dwellings and supports the view that exceptional circumstances do not exist for their release.

Further comments on these two housing sites and their effect on the village are made under Item C of these objections.

Item B the status of the Brinklow Neighbourhood Plan site Policy HO4 Lutterworth Road Brinklow and an update on the needs of the village.

Paragraphs 3.15 and 3.16 of Mr Kell’s report relate to the current proposals of the Brinklow Neighbourhood Plan Policy HO4 Lutterworth Road which designates a site for a total of up to 19 dwellings that comprises up to 12 affordable homes and 7 elderly person accommodation. This mix was arrived at following an extensive questionnaire survey that met identified housing needs.

Paragraph 3.23 identifies that the provision of up to 12 affordable houses will assist in meeting the overall need for more affordable homes in the district.

The Parish Council understand that the land owner of the policy HO4 Lutterworth Road site is currently having discussions with a developer Linfoot Country homes with the intention of submitting a planning application to Rugby Borough Council for a proposal of 18 units of accommodation that would provide 12 numbers of affordable housing and 6 numbers of accommodation purposefully designed for occupation by elderly persons.

An application is expected to be submitted within the next few months. The development of this site as seen by this expected application therefore will provide 18 additional units of accommodation that are over and above the numbers previously required by the original local plan. These additional numbers should be recognised as a contribution to meeting any new increase in housing figures that are proposed in the emerging new Rugby Local Plan.

In considering what the Parish Council's response to the Regulation 18 draft of the Revised Rugby Local Plan would be it was decided that as part of their evidence base for their comments Brinklow Parish Council should undertake a questionnaire survey which was undertaken in April 2025 which:

1. requested comments on the proposed new housing sites put forward by Rugby Borough Council Combined site 337 land at West Farm and Home Farm for 75 dwellings and site 315 for 340 dwellings.
 2. Sought to update the housing needs of the community by asking the residents of their future anticipated needs and the types of accommodation that is required for the village.
- Invited residents to suggest locations of land that might be suitable and available to fulfil any specific types of development.
1. Requested residents to rate the importance of types of tenure of different properties.
 2. To identify any issues of transport and traffic and other infrastructure.
 3. To rate the importance of and improvements to facilities such as shops. Café/restaurants, businesses, meeting places and sport and recreation, doctor's surgery and other forms of health provision and other social and community uses.
- Improvements to school and young person's sport and recreational facilities.
 - Importance of environmental features.

The results of this questionnaire survey are being collated now and will provide an up-to-date review of the needs and aspirations of the community.

The details will form the basis of any review of the Brinklow Neighbourhood Plan but also will be forwarded to the Rugby Local Plans team to continue to support these objections made to the regulation 18 submission and to support further suggestions from the Parish Council for amendments that should be included within the regulation 19 version of Rugby Local Plan that would be provided later in 2025-26.

Item C: Objections to the two specific housing sites proposed by Rugby Borough Council for land at Brinklow:

Please refer to section 4 of the report provided by Gerald Kells in which he considers the setting of the village as well as the two sites Site 337 West Farm and Home Farm for 75 homes and Site 315 land south of Rugby Road for 340 homes and their setting within the Green Belt.

Mr Kells noted in his paragraph 4.28 that "a review of the Green Belt assessment is expected to take account of the updated NPPF, but this has not yet been carried out by Rugby Council and is not available for this regulation 18 consultation."

In connection with Site 337 Rugby Borough Council have indicated that part of the site should include the conversion and redevelopment of existing farm outbuildings which have historic significance and development here must be sympathetic to this setting and respond in scale to the character and integrity of Brinklow.

It was stated by Mr Kells in paragraph 4.47 that "apart from the heritage assessments the existing assessments are for the two parts of the site 337 and do not consider any cumulative impacts". He draws attention in paragraphs 4.49 to 4.62 to the results of the HEDNA report and the sensitivity of the site being located within the conservation area, in the green belt and of high landscape sensitivity.

With reference to site ID315 for 340 dwellings he identified the site as being two fields that are bounded by Heath Lane and Rugby Road and entirely within the Green Belt and further assessment is required.

Paragraphs 4.63 to 4.76 identify his conclusions and in paragraph 4.63 he states, “I am not convinced based on my assessment of need and supply that either site is needed, and it would be better to direct housing towards brownfield sites in Rugby and through the duty to co-operate with Coventry.” In paragraph 4.66 he expresses particular concern about the development on site 315 as it would encroach significantly into the Green Belt with no clear boundary.

He was also concerned that the proposed increase in the size of the village by the development of these two sites would mean that the facilities in the village were inadequate, and more children would need to be bussed to school in another village and such a large scale of new housing would lead to traffic congestion.

In responding to the regulation 18 submission Brinklow Parish Council also undertook a review of the proposed two sites 337 and 315 and attached is a report, [Brinklow Housing Sites Assessment Team Report.odt](#) prepared by Site Assessment Team of the Parish Council.

Their conclusions are that they object to doubling of the size of Brinklow and assert that this scale of growth is not sustainable. There are no plans to add any additional infrastructure to cope with this population growth and there is no primary school at Brinklow with children currently having to be bussed to Monks Kirby 3 miles away. Development of the scale being proposed places additional pressure on safety for walking and cycling and there is no proposed improvement to the public transport services. Such proposals will also have a detrimental impact on the ecology and biodiversity.

That report considered the specific issues relating to both sites and concludes that in reviewing both parts of site 337 they estimated that a limited area of development restricted to the brownfield part of the site might be capable of delivering up to a maximum of 30 dwellings whilst retaining the existing historic buildings.

When considering site 315 the view was held “that development of this site would impact on the views across the rural landscape -in Brinklow’s case a conservation area, destruction of ridge and furrow landscape, harm to the character of the conservation area and the setting of Brinklow’s historical assets.” Strong objections are raised to this site, and it is requested that this proposal should be deleted from the regulation 18 document.

In summary Brinklow Parish Council object to the proposals put forward by Rugby Borough Council to designate site 337 for 75 dwellings and site 315 for 340 dwellings in the regulation 18 revised local plan for the reasons outlined above which have been expanded by the additional reports provided by Mr Gerald Kells and the site assessment team from the Parish Council.

The conclusions are that this is an unrealistic and unjustified approach and that any development should be more widely and fairly dispersed thus reducing the impact on all small rural settlements.

In reaching these conclusions the Parish Council are undertaking an update of their Neighbourhood Plan and have commissioned a survey of the needs and aspirations of the village which may lead to additional housing sites being considered in the future following the recent call for information concerning needs and opportunities requested in March/April 2025. Some possible locations were mentioned in the report provided by the site assessment team report and they and any others received will be carefully assessed to see if they will meet the identified needs for the future. A report

of these findings will be provided in due course and be the subject of discussions between the parish council and Rugby.

Item D Objections to policies referenced in the Rugby Borough Council Preferred Option Consultation Document March 2025:

Further to the above objections we have, as requested in the consultation process, identified to which policies these objections relate.

Policy S1 Settlement Hierarchy

Reasons for objections: The new development proposed will not be of a scale commensurate with the services and facilities of Brinklow and would double the size of the village with no improvements to infrastructure or facilities and other support services being provided.

The proposals are also located outside the settlement boundaries and would therefore be contrary to Policy S5 countryside protection.

Policy S2 Strategy for homes

Reasons for the objections: There is a fundamental flaw in the approach as argued by calculations of the total amount of housing proposed to be delivered in the period identified by Mr Gerald Kells in his attached report. In that report he concludes in paragraphs 2.66 to 2.69 that the need figure in the Plan of 618 is based on the NSM which appears to represent an over estimation of genuine need that under the old SM would have been 525 dpa. Assumptions have now changed and furthermore the figures should be less as the Council should reset the end of the Plan period to the legal requirement of 2042 which would reduce the overall need by 1,854 dwellings and alleviate the pressure on the Green Belt.

Policy S5 Countryside Protection

There is no objection to this policy per se but the locations of the proposals for the additional housing at Brinklow as proposed by Rugby Borough Council will harm the intention and integrity of Policy S5 and have a detrimental effect on the character and appearance of the green belt at this point. The National Green Belt policy should continue to apply in these locations.

Policy S6 Residential allocations

Objection is made to this policy as the sites marked 337 West Farm and Home Farm Brinklow and 315 Land south of Rugby Road Brinklow should be deleted for reasons that are expanded in the above objections under items A, B and C above. Brinklow is not a main rural settlement and is not suited to receive such a large number of new homes as it lacks sufficient infrastructure and other essential services that could support such growth.

Policy EN1 Biodiversity and geodiversity protection

The proposed development on sites 337 and 315 will be harmful to the intentions of policy EN1 where the protection of biodiversity and local wildlife is paramount. Both sites are located within the open landscape of the green belt and as such should be afforded greater protection from development.

Policy EN2 Landscape protection

The proposed development on sites 337 and 315 will be contrary to policy EN2 where development should be avoided if it has significant adverse impact on landscape character and visual impact. It would have detrimental impacts on the character of the area and the setting of the heritage assets of the settlement of Brinklow.

Policy EN7 Environmental protection and amenity

The development of the scale proposed by the allocations will cause unacceptable harm to the natural environment and to the amenity of existing residents of Brinklow in relation to water, noise, light pollution contamination and loss of privacy and overbearing impact of the scale of built development.

Policy EN8 Air Quality

The development proposed will give rise to unacceptable levels of air quality due to increase in traffic and general use of the buildings.

Policy H1 Housing Mix

The scale of development proposed is not justified by an identified housing need and there is no evidence that the scale of these proposals will create a mixed, balanced and inclusive form of development that is of benefit to the village of Brinklow.

Policy D1 Well-designed places

The proposed allocations will not be in accordance with this policy as they will not create well designed places that respond well to the rural context and character nor create good connectivity and integration between the natural and built environments.

Policy 11 Transport

The proposed allocations will be contrary to the transport user's hierarchy and will not meet the requirements of that policy namely to minimise the use of a car, provide safe opportunities for walking and cycling and enhanced public transport.

Policy 14 Infrastructure and planning obligations

The proposals will be contrary to the aims of this policy because the new developments will exceed the capacity of the existing infrastructure and cause unacceptable impacts and there is no indication that there are reliable mechanisms in place to deliver the requisite infrastructure upgrades that would mitigate the impacts.

Annex Development site allocations

For the reasons outlined in the above objections Brinklow Parish Council object to the Residential allocation 337 West Farm and Home Farm Brinklow for 75 dwellings and to the residential allocation 315 Land south of Rugby Road Brinklow.

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From: [REDACTED]
Sent: 17 May 2025 10:02
To: Local Plan
Subject: Preferred Option Consultation
Attachments: Brinklow Development Survey 2025 (1).pdf

Objections to the Regulation 18 Consultation from Rugby Borough Council regarding the Preferred Option Consultation Document

17th May 2025 from Brinklow Parish Council

Brinklow Parish Council commissioned Mike King of People & Places Insight to conduct an independent survey to establish what percentage of the Brinklow residents were opposed to the new development outlined in Policy S6, and what the housing needs of the village actually was.

He states that 90% of the responses opposed the developments described in Policy S6. The total number of replies was 249 which is about 30% of the households in the village which is a statistically a good response rate.

Over 50% of respondents highlighted the importance of 'Properties to enable older people to move into more suitable accommodation for their needs' (59%) and 'Affordable properties to enable local young people to move to, or remain living in Brinklow' (57%).

We note that the key themes to the responses which object to Policy S6 are set out below and relate to:

Design : The allocation of both housing sites 337 and 315 are inappropriate for their locations and are not justified. However for any portion of housing to be justified they must fit in visually to the street scene, include garden areas, be in the majority privately owned, provide off street parking and traffic calming measures and include CCTV coverage for security.

Environment: 90% of responses stressed the need to retain and enhance environmental features such as protection of the green belt, the provision of and enhancement of green space, improvements to wildlife sites, improved flood protection, improved access to the countryside, provide connectivity of footpaths and bridleways.

School and playing fields: Any development should include an upgrade of school provision for nursery and primary education within the village and improve access to secondary school elsewhere. There is a large demand for more playground and open spaces for recreation.

Health: 80% of respondents recorded the need for improvements to medical facilities with a larger doctor's surgery and other medical needs and pharmacy.

In terms of qualitative responses, the key themes to emerge from the feedback was that residents were opposed to the new development because of 'Lack of Infrastructure' including 'Doctors, 'Schools' and 'Traffic'. Environmental issues were also mentioned such as 'Loss of Green Spaces', 'Flooding' and 'Impact on the Sewage System'. Finally, 'Loss of Village Identity' was another key theme.

We attach the full report to this response to the consultation.

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[REDACTED]

[REDACTED]

02

From: [REDACTED]
To: [REDACTED]
Subject: 17 May 2025 10:08
Local Plan
Preferred Option Consultation

Objections to policy D1 Well designed places, Policy 11 Transport and Policy 14 Infrastructure and Planning Obligations.

Impact of Proposed Housing Development on School Provision in Brinklow

Rugby Borough Council's plan proposes development in larger villages to support local services. Unlike Wolston, Long Lawford and Stretton-on-Dunsmore, Brinklow has no primary school, making it the only "large village" identified for significant housing expansion without one. This makes the development proposal fundamentally flawed in terms of school provision.

The National Planning Policy Framework (NPPF) emphasises that development must be socially, economically, and environmentally sustainable. Increasing the size of a village by 80% - despite it having no school, already congested roads, and an overburdened, failing transport system - directly contradicts the core principles of sustainable development set out in national planning policy.

Brinklow currently hosts only a Reception class in a listed building with no room for expansion. All other primary-aged pupils must travel nearly 4 miles to Monks Kirby. Secondary school provision is also inadequate, with no clear local option and unreliable and unsafe transport links. The proposed 415 new homes would overwhelm the already strained education infrastructure and make a system that already doesn't work for working or non-working families even worse.

Primary School Capacity & Provision

- Brinklow's only provision is a Reception class of 45 children, based in a listed building with limited capacity.
- Years 1–6 attend The Revel CofE Primary School in Monks Kirby.
- After Reception, all pupils travel to Monks Kirby, creating heavy dependence on transport.
- Currently, three buses transport primary pupils daily; journey times are 20–25 minutes each way.
- These school buses must turn around within Brinklow village, creating hazardous manoeuvres and contributing to traffic congestion on already narrow and busy roads.
- The Revel School was designed for multiple villages. Brinklow is now the only village with new homes allocated, creating a major imbalance.
- Expanding the Monks Kirby site is possible but would intensify traffic, disrupt families, and require even Reception-age children to be bussed, raising safeguarding concerns.
- The listed building in Brinklow is ineligible for further development due to heritage protections, making permanent local provision impossible without a new build.

Secondary School Access & Transport Concerns

- Brinklow has no one clear catchment secondary school; pupils attend various schools based on space – even siblings living in the same household!
- All options are over 5 miles away, requiring bus travel.
- Warwickshire County Council has withdrawn council-run buses due to funding cuts.
- Students now rely on limited public buses, many of which are at capacity, forcing some students to stand for up to an hour.
- These buses travel on rural roads with 50mph+ speed limits, creating safety issues, particularly for those standing because the buses (which travel from Coventry) were full by the time they arrive in Brinklow.
- Private school transport options exist but cost up to £900 per child annually, placing a financial burden on families.
- The issue is compounded by lack of late buses, limiting opportunities for extracurricular participation.

Traffic, Parental Access & Employment Impact

- Increased pupil numbers would require more buses—or more parents driving to Monks Kirby, twice a day.
- This would force working parents to adjust jobs or find flexible employment to accommodate drop-offs and pick-ups.
- Many parents are understandably uncomfortable with children as young as 5 spending so much time traveling with pupils as old as 11 with limited supervision.
- Monks Kirby already experiences severe congestion during drop-off/pick-up times. Residents have created an informal one-way system just to get off their driveways.
- The current infrastructure does not support safe and efficient scaling of traffic volumes.

Capacity vs. Demand

- Warwickshire's place planning suggests every 100 homes adds approximately 31 primary and 19 secondary pupils.
- 415 new homes in Brinklow would create demand for approximately 130 additional primary school places.
- The Revel's current configuration cannot accommodate this without significant expansion.
- Even a two-form entry system in Monks Kirby would only add 105 places, falling short.
- This projection assumes uniform yield, not accounting for Brinklow's trend toward younger family households, which may increase pupil yield.

Social, Emotional & Educational Impact

Before examining the day-to-day realities, it is important to note that children with special educational needs and disabilities (SEND) are disproportionately affected by this setup. Long, complex journeys, changing routines, and unfamiliar peer groups risk significant harm to their confidence, learning and wellbeing.

- Long commutes affect children's confidence, wellbeing and school engagement.
- Parents report children becoming withdrawn or anxious due to sharing buses with older pupils.
- At present, only one chaperone is present on each bus and parents have been told this funding may not be able to continue. This would increase the risk of bullying or distress going unnoticed.
- No late buses are available for students at local primary or secondary schools; students miss out on afterschool enrichment, contributing to social exclusion and lack of belonging.

- Rising absenteeism and mental health issues among schoolchildren mean this setup risks compounding vulnerability.
- The lack of social integration also affects children's sense of community, disconnecting them from local peers.

Conclusion

Developing Brinklow without a proper education strategy will strain an already unfit system. Unlike other villages, Brinklow lacks the infrastructure to support such growth. Using developer funds to expand Monks Kirby would benefit a site with no housing growth, worsening inequality.

A sustainable and fair approach would require:

- A local education solution for Brinklow.
- Proper transport provision.
- Full consideration of the social, emotional and economic effects on children and families.
- Recognition that Brinklow's context is distinct from other development sites and demands a bespoke education solution.

Without such major investment in infrastructure that could deliver a new primary school and improved public transport services to reach secondary school provision elsewhere any large scale housing development such as is proposed by Rugby Borough Council would fail the very community it aims to serve. Such a development would be contrary to proposed policy D1 Well designed places, Policy 11 Transport and Policy 14 Infrastructure and Planning Obligations. For these reasons we object to the two proposed housing sites for Brinklow namely site 337 for 75 dwellings and site 315 for 340 dwellings.

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From: [REDACTED]
To: [REDACTED]
Subject: 17 May 2025 10:13
Local Plan
Preferred Option Consultation

Objections to the Regulation 18 Consultation from Rugby Borough Council regarding the Preferred Option Consultation Draft Local Plan

We object to the Policy S6 Residential allocations

With reference to the allocations of two sites for 340 and 75 more dwellings in Brinklow. These dwellings could easily bring 1660 further inhabitants to the village, all seeking medical care.

Please see the email below from the Revel Surgery which makes clear that they cannot accommodate an increase in numbers of patients of this magnitude. We therefore strongly object to this increase in the village population when there is no possibility of them obtaining adequate local medical care.

E-mail from [REDACTED]

[REDACTED]

Good afternoon [REDACTED]

Please see below our response to your enquiry:

Thank you for asking us for our opinion regarding the proposed housing development, and the impact this would have on the surgery.

We will not comment on any impact on the infrastructure, roads, schools etc as this is not in our remit.

400 houses would equate to the potential for a further 800-1600 patients. This would push our practice number from circa 8000 to 9000-9500 patients.

While we have sufficient GP's to manage extra patients (based on the RCGP recommendations of GP's per patient), our current building has insufficient space to accommodate an increase in numbers of this magnitude. The car parking is inadequate for the current demand as it is. With the lack of available estate funding through NHS England/ICB to build a new building with larger parking area, we cannot foresee a change in this regard and so we would not support a large-scale development in Brinklow.

Kind regards

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[REDACTED]

From: [REDACTED]
Sent: 17 May 2025 10:16
To: Local Plan
Subject: Preferred Option Consultation
Attachments: Traffic surveys intro May 2025-15Mayl Final.docx

Objections to the Regulation 18 Consultation from Rugby Borough Council regarding the Preferred Option Consultation Draft Local Plan

Brinklow Parish Council objects to the Policy S6 Residential allocations

Some of the information necessary to prepare a sound local plan is still missing. For Brinklow, which is already submerged in an excessive flow of traffic, the Local Highway Authority's Strategic Transport Assessment (STA) would have been critical in allocating new sites. We were assured verbally, in RBC planning meetings with the Parish Council, that transport assessments for the proposed sites in Brinklow had been done. We repeatedly requested these assessments but they were not provided. Accordingly we set up our own transport assessment for Brinklow.

Our concerns with the housing allocations in Policy S6 were that the extra traffic effects of the access to the Coventry Road and the Rugby Road from the proposed sites would result in excessive traffic queues and severe delays on Rugby Road, Coventry Road and at the junction of Broad Street..

Furthermore the effects of the extra traffic from second access to Heath Lane and Green Lane from the main proposed site on the south side of Heath Lane would put pedestrians at risk and result in more accidents. This was because Green Lane is a single track road with no footpaths or street lighting, with a dangerous and accident-prone junction with the Coventry Road. Improving this junction would require purchase of third party land.

We attach the full results of our Traffic Survey, in brief our conclusions were:

- The peak traffic location in Brinklow is Rugby Road, which takes up to 900 movements per hour at peak times.
- Both of the proposed developments will egress at this location
- The current road network will struggle to cope at peak times
- Brinklow is an increasingly business thoroughfare

- Traffic movements do not take into account additional volume from the major Ansty Frasers development

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From: [REDACTED]
Sent: 17 May 2025 10:20
To: Local Plan
Subject: Preferred Option Consultation
Attachments: Rugby Plan reg 18 brinklow housing send (3).pdf; Brinklow Parish Local Wildlife Sites.docx

Objections to the Regulation 18 Consultation from Rugby Borough Council regarding the Preferred Option Consultation Draft Local Plan

Brinklow Parish Council objects to the Policy S6 Residential allocations

415 homes are proposed in Brinklow, which sits in the Wildlife Trust Dunsmore Living Landscape project area.

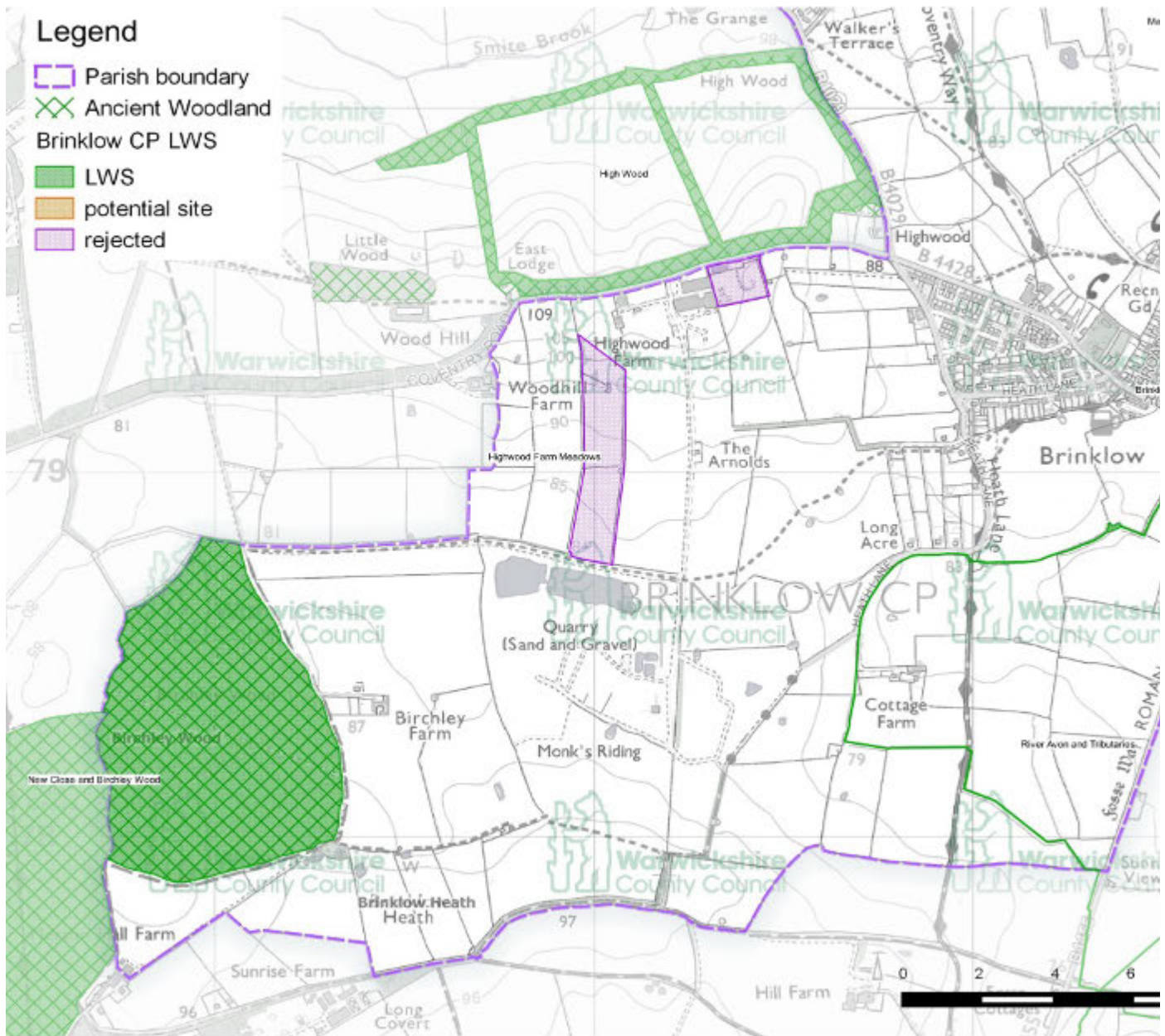
We are concerned that the site 315 is a risk to local wildlife: Please refer to the attached report [Rugby Plan reg 18 brinklow housing send \(3\).pdf](#)

Within that report we refer to paragraph 4.52 below:

4.52 The Ecological constraints assessment identifies that the site 315 is located within the Impact Risk Zone IRZ associated with Combe Pool SSSI and Brandon Marsh SSSI. It is also adjacent to the River Avon and Tributaries Local Wildlife Site (LWS), which comprises a narrow watercourse and banks which runs down the Eastern side from an area of semi-improved natural grassland to the Southern tip of the site.

We also have a further risk to wildlife, adjacent to the other site comprising Home Farm and West Farm, as we have the track of the historic old Brinklow Canal and we refer to the paragraph below in the Brinklow Parish Local Wildlife site report, attached as [Brinklow Parish Local Wildlife Sites.docx](#)

Brinklow Civil Parish Local Wildlife Sites



Brinklow Disused Canal Pool LWS

Brinklow Disused Canal Pool was first surveyed for local wildlife site status in 2017 and designated in 2018 (Bowley, 2018). The site consists of two moderately species-rich water bodies situated within an area of cattle pastures, which are remnants of one of the original meanders of the Oxford Canal, cut off in the early part of the nineteenth century.

The western end of the site is located just 150m to the east of Broad Street, Brinklow and extends eastwards to Rugby Road. It is surrounded by medium sized cattle pastures, enclosed by a variety of often well-timbered hedgerows. The farm stockyard is situated immediately south of the site, with the northern entrance to the farm dividing the main pool from the much smaller pool to the west. The nearest LWS to the site is Brinklow Castle situated about 300m to the north across the fields, where there is another linear water feature in the southern moat. The present course of the Oxford Canal pLWS is a major wildlife corridor located 500m to the east beyond Rugby Road.

There is quite a high diversity of plants for the small size of the site, with 101 species of vascular plants recorded. Most of these are typical of either waterside habitats, such as Reed Sweet-grass,

Common Marsh-bedstraw, Yellow Iris, Gipsywort, Water Mint, Common Watercress and Common Skullcap; or of well-established hedgerows, such as False Brome, Herb Robert and two species of violet. The site also includes Glyceria swamp, lily pads, wet willow scrub, areas of cattle-poached mud and rough grassy marginal ground.

We are concerned about the negative impact on vulnerable wildlife on these sites from increased traffic, lighting, noise and increased activity. Local Wildlife Sites act as vital refuges for wildlife in a landscape which is already fragmented by roads, housing, and development. Whilst it is important to provide housing and infrastructure, these developments must work with nature to deliver positive outcomes for both wildlife and people. House building targets in the plan seem to have been grossly exaggerated, putting additional pressure on important wildlife sites.

We would hope that the Council would have considered alternative locations away from important wildlife corridors and nature reserves, to lessen the impact on wildlife, in their initial site assessment work. We need to increase habitat connectivity, not fragment it, so we can make a difference for wildlife on a landscape scale.

Local Wildlife Sites act as vital refuges for wildlife in a landscape which is already fragmented by roads, housing, and development. Whilst it is important to provide housing and infrastructure, these developments must work with nature to deliver positive outcomes for both wildlife and people. House building targets in the plan seem to have been grossly exaggerated, putting additional pressure on important wildlife sites.

We would hope that the Council would have considered alternative locations away from important wildlife corridors and nature reserves, to lessen the impact on wildlife, in their initial site assessment work. We need to increase habitat connectivity, not fragment it, so we can make a difference for wildlife on a landscape scale.

The Plan states 'Biodiversity Net Gain' at 10% will be used as a tool to deliver biodiversity ambitions and increased diversity of plant and animal life, but there is nothing ambitious about the already required target of just 10% net gain. We believe this target should be 20%. Other Councils in the UK have adopted plans with higher targets, such as Cornwall Council.

Finally we are extremely concerned that there is no specific 'Local Nature Recovery Strategy' policy. This is a fundamental policy needed to help to deliver the government's targets of 30% more land in recovery for nature by 2030. Without a Local Nature Recovery Strategy, there is no clear plan of how this can be achieved.

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[REDACTED]

From: [REDACTED]
Sent: 17 May 2025 10:22
To: Local Plan
Subject: Preferred Option Consultation
Attachments: RAP Version 3 as PDF.pdf; Brinklow Housing Sites Assessment Team Report.odt

Brinklow Parish Council objections to the Regulation 18 Consultation from Rugby Borough Council regarding the Preferred Option Consultation Draft Local Plan

We object to the Policy S6 Residential allocations.

As the attached RAP report from Richard Allenach shows, there are alternative approaches which avoid the huge numbers of houses in the villages and the destruction of valuable green belt and farming land.

The draft Local Plan should take account of the available brownfield land, as laid out in the RAP.

Having developers, motivated only by profit, destroying greenbelt and good farming land because it is cheaper to develop, while leaving behind them a trail of unoccupied derelict brownfield sites is completely unacceptable.

Brinklow Parish Council, as shown in our attached Housing Sites Assessment Teams report, is able to find alternative sites for the smaller number of houses proposed in the RAP.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]