

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="Stephen"/>	<input type="text"/>
Last Name	<input type="text" value="Ainsworth"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<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="██████████"/>	<input type="text"/>
E-mail Address	<input type="text" value="████████████████████"/>	<input type="text"/>

(where relevant)

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	EN8 – 5.25	Local Plan Policy	EN8	Policies Map	
Site ID	315				

4. Do you consider the Local Plan:

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

No Data has been published with the Plan concerning the Capacity of the existing sewage works that currently services Brinklow Village, nor has Data been supplied that outlines how much extra capacity is required to service the proposed additional Housing outlined in the Plan. Brinklow has a combined sewage system, where Rain Water/Run Off is not segregated from Raw Sewage, so all goes to the current treatment works through the same system. There is a well documented issue with the fall of the Main Sewage Feed Pipe that runs from the Village to its Sewage Treatment Works, and Severn Trent has to gain access to blast through this pipe several times a month to clear blockages.

In addition, because of the combined Sewage System, the current Treatment Works is regularly overwhelmed, leading to raw Sewage being discharged into the local River, furthermore, there have been a number of recent incidents where a restriction in the flow of sewage from the Village to the Treatment Works has caused Sewage to back up leading to a most unpleasant overflow within the Village itself.

The addition of the extra Houses will add to this pressure on the System, increasing the frequency and volume of these Discharges in clear contravention of the Policy stated in Paragraph 5.25.

(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.

It will be necessary to significantly upgrade the Sewage System and Treatment Works in Brinklow, including changing it to a segregated system allowing the movement of Rain and Run Off Water and Raw Sewage through Separate Systems, and this work should be completed before any development Works are undertake within the Village.

(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)

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To ensure the points I, and others, have made are heard.

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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.

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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

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Local Plan Paragraph	EN8 – 5.25	Local Plan Policy	EN8	Policies Map	
Site ID	337				

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In addition, because of the combined Sewage System, the current Treatment Works is regularly overwhelmed, leading to raw Sewage being discharged into the local River.

The addition of the extra Houses will add to this pressure on the System, increasing the frequency and volume of these Discharges in clear contravention of the Policy stated in Paragraph 5.25.

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Local Plan Paragraph	<input type="text" value="8.9"/>	Local Plan Policy	<input type="text" value="D4"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="337"/>				

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There are currently a number of well used Public Rights of Way through the Area of the Development of Home Farm and West Farm, Brinklow, (Site ID 337), and none of these are accommodated within the current Site Plan, nor are the effects of development on Public Rights of Way mentioned in the Plan in any way.

Any Layout submitted for this proposed development needs to clearly show the routes of the current Public Rights of Way, so that it can be clearly seen that they will not be obstructed in any way, whether during the Construction phase, or by any Properties built during or enclosed by the development.

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

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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" value="3.1"/>	Local Plan Policy	<input type="text" value="E1 and E3"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="337"/>				

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(1) is Legally compliant	Yes	<input type="text"/>	No	<input checked="" type="text" value="x"/>
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The Development of West Farm (Site ID 337) is of particular concern as it effectively removes a Rural Business that has operated within the Village for many years, and provides both permanent Employment and Seasonal Casual Employment (mainly at Christmas) for Local Folk.

The LandOwner has been particularly unscrupulous in this Case, as the Tenant Farmer who operates West Farm had no knowledge that the land he Farms had been offered for development, only discovering this via the Media on the day of the announcement.

It is morally wrong that such a LandOwner should be rewarded for doing this.

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

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The Development of Home Farm and West Farm should not be allowed to prevent the Destruction of this Local Business.

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(where relevant)

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" value="EN8"/>	Local Plan Policy	<input type="text" value="5.27"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="315"/>				

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(1) is Legally compliant	Yes	<input type="text"/>	No	<input checked="" type="text" value="x"/>
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A significant proportion of the area proposed for development on the Land South of Rugby Road, Brinklow, is currently used to grow Arable Crops.

It is considered Prime Agricultural land (Grade 1, 2 and 3a).

Rugby Borough Council has not outlined, or demonstrated, any "Overriding Need" in the Plan that justifies the development of this Land.

In addition, the Plan itself does not include any reference to current UK Government Policy which stipulates that no Development should be permitted on any Grade 1, 2 or 3a Arable Agricultural Land unless an Overriding Need can be clearly demonstrated.

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

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The Land covered by Site ID 315 should not be developed as there is no "Overriding Need" that justifies developing the Grade 1,2, 3a Land that is the subject of the majority of this Proposal.

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

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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" value="EN1"/>	Local Plan Policy	<input type="text" value="5.1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="337"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="x"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
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A Fishing Pond is currently situated within the Area covered by the Development of Home Farm and West Farm Brinklow (Site ID 337).

This Pond is made by an area of the old Canal that ran through the Village which was not filled in, and, as such, has not been disturbed for several hundred years.

It is known that the Pond contains several species that are considered endangered, including Great Crested Newts.

The development outlined in Site I.D. 337 will certainly adversely affect this particular Ecosystem.

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

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No Development should be considered that affects the long established and undisturbed Ecosystem around the Fishing Pond.

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Name or Organisation:

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

Local Plan Paragraph	All	Local Plan Policy	All	Policies Map	
Site ID	All				

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(1) is Legally compliant	Yes		No	x
(2) is Sound	Yes		No	x
(3) complies with the Duty to co-operate	Yes		No	x

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I believe that the key weakness of this Plan is that there is no Data shared with it.

There is no Data concerning the current capacity of any of the Infrastructure Services (water, Gas, Electricity, Sewage, communications etc.), and no Data for what impact any new Development is expected to make on them, and where the funds will come from to rectify any shortfall identified.

There is no Data concerning the current Capacity of the Services we rely on, Schools, GP Surgery, local Hospitals, Fire, Ambulance, Police etc, and no Data on how the extra Homes and Business will impact them, what the plan is to rectify any issues highlighted, and where the funds will come from to allow the necessary actions to be taken.

There is no Data concerning local Road Use (apart from what we have collected for ourselves) and no Data on what the likely increase will be after the proposed Developments are made (a number of the "Roads" that are offered as access to proposed Developments are narrow single track lanes), and no information on what actions will be taken and where the funds will come from to do the necessary works.

When these issues were raised with the RBC Officials who came to discuss the "Plan" with us, their universal response was "Not our Problem".

Surely, all these potential issues should be identified and a funded plan of action agreed so that the necessary Works and Capacity Increases are completed BEFORE any of the proposed Developments take place?

We have the bitter experience of the Developments at Long Lawford to draw on, where much was promised in terms of a new GP Surgery, School Expansion etc., but nothing has been done, leaving we local Folk to collectively make do and mend to make things work.

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

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A proper Plan, with all the relevant Data included, and funded, practical and deliverable Plans for all the necessary improvements to be identified, together with a realistic timing plan to show what will be delivered when, and when any funding is required to be committed, should be prepared based on real need and submitted for approval.

Surely this is not too much to ask.

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To ensure the points I, and others, have made are heard.

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.

No AI used.

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>