

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.*

Title

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

(where relevant)

2. Agent's Details (if applicable)

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

Name or Organisation: JPPC

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

| | | | | | |
|----------------------|----------------------|-------------------|--------------------------------------------------------------------------------------------------------------------------|--------------|----------------------|
| Local Plan Paragraph | <input type="text"/> | Local Plan Policy | <input type="checkbox"/> S1 <input type="checkbox"/> S2 <input type="checkbox"/> S6 <input type="checkbox"/> H2 | Policies Map | <input type="text"/> |
| Site ID | 337 | | | | |

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"/> |

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.

*suggestions made to ensure soundness

Please see attached letter for full representation.

Endorse spatial strategy of dispersed development and allocations in rural areas including Brinklow. Support allocation of site 337.
Comments of detail of proposed development policy 337 to ensure effectiveness and soundness. P

Please see attached letter for full representation.

(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.

Please see attached letter for suggested modifications.

(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:

To explain merits of the allocation and answer Inspector questions, including the spatial strategy that leads to it, and its role in the soundness of the Plan. To answer questions related to proposed modifications to allocation policy.

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>

JPPC ref: DB/9324

Planning Policy
Rugby Borough Council
localplan@rugby.gov.uk

SUBMITTED VIA E-MAIL

11 March 2026

Dear Sir or Madam,

**Rugby Borough Local Plan Pre-Submission Consultation (Reg. 19)
Proposed development at West Farm, Brinklow**

1. Thank you for the opportunity to comment on your Rugby Borough Local Plan- Pre Submission document. We write to make comments on behalf of our client Mrs S Reed and Trustees of the GJ Walpole-Brown Discretionary Settlement who own West Farm, Brinklow.
2. Our clients' land forms the bulk of the preferred site for allocation to provide 75 dwellings under policy S6. We support allocation of the land for residential development. Our clients' land is a sustainable and suitable development site and can contribute as part of a larger site with neighbouring land. The site offers particular benefit as a smaller allocation which should allow for swifter delivery than larger strategic sites.
3. This submission is made in two parts. Firstly, our response on the Local Plan at a high level, addressing strategic matters. This is set out in paragraphs 4-8. Comment directed specifically to the proposed allocation at West Farm, Brinklow including our client's land follows (paras. 9-27).

Spatial strategy

4. We endorse the Council's approach of dispersed development with proportionate development spread across the borough's rural settlements, complimenting larger growth at the principal settlement.
5. The NPPF is clear in its requirement for development plans, in common with planning at all levels, to support rural areas. Paragraph 83 states:

"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"

6. We believe allocations of housing sites in rural areas to be vital to satisfying the NPPF requirement to sustain rural communities, and so the Plan being sound. We welcome their inclusion, including the proposed allocation at West Farm, Brinklow. Brinklow is a very good example of a sustainable rural village the NPPF seeks to protect. It has a range of local facilities that it is essential to sustain for the good of the settlement and nearby rural population that look to the village for services.
7. Noting the sustainability appraisal that has informed Local Plan we concur that the proposed dispersal of development around smaller settlements represents the most suitable strategy.
8. An alternative that focussed development on few large town or edge-of-town sites would not be sound as it would not sustain rural communities as required by paragraph 83 of the NPPF and so would not be sound. Furthermore, the scale of development envisaged across the plan area would mean if located at Rugby alone it is unlikely that development would be sustainable. Although Rugby benefits from a range of services and facilities, a development to meet the borough's development needs would be so large as to place most households remote from the main services and facilities of the town.

West Farm, Brinklow (S6)

9. We support the Council's proposed allocation of land at West Farm, Brinklow for development. Brinklow benefits from a good range of services and facilities to support new households including shops, public houses, recreation ground, community centre, and an early year's primary school. These facilities are clustered around Broad Street that can be accessed directly via a public footpath from West Farm.
10. West Farm is proximate to the village centre and certainly sufficiently close that households located there can access the facilities on foot to sustain local facilities and maintain a vibrant community as aspired to by the NPPF. The proposed additional households (75) can help sustain facilities without (noting the ease of access on-foot) adding to parking pressure in the village centre.
11. The intended development at West Farm should not be dependent on the larger allocated site in the village (315) for delivery and correctly stands as an individual allocation. Indeed, as a smaller site West Farm, can be delivered more swiftly than large strategic sites. It is correct that West Farm is allocated as a standalone development in order that it can be progressed independently and required homes provided in the earlier part of the plan period.
12. We welcome allocation of the land for residential development. We believe the site to be suitable for homes of all types. The excellent access to the village facilities on Broad Street allows for sustainable development with walking access to a doctor's surgery (Revel Surgery) an unusual benefit, particularly valuable where homes for older residents are planned.
13. The Council's evidence base indicates that demand is for market homes for older people rather than affordable units. It is therefore correct that policy H2 excludes accommodation for older people from affordable housing requirements, to do otherwise would not be justified by the evidence and so would not be sound.

Heritage

14. We agree with your site assessment that a development can be accommodated in compliance with policy that protects heritage assets around the site. The nearest

heritage assets are the grade II listed buildings 5 and 7 Rugby Road to the southwest of the site, and the Scheduled Monument of the motte and bailey castle around 30m to the north.

15. The importance of the ancient monument is acknowledged, however the arbitrary restriction on *any* built development of the eastern part of the site, as set out in the development principles, is not clearly justified or supported by evidence and undermines the policy's effectiveness.
16. The blanket ban on built development could prevent beneficial built form in the intended green space. For example, a shelter for users of the green space would be beneficial and could realistically be provided without harm to the monument. However, as drafted it would be contrary to the development principle. Heritage assets are afforded protection by development management policies in the Plan and NPPF that allow balanced assessment of proposals and prevent harmful development. These offer adequate protection and allow the merits of proposals to be properly considered at application stage.
17. To ensure an effective and sound policy we suggest the area subject of the proposed development 'ban' is instead noted as an area sensitive to heritage impacts with the blunt moratorium on development removed. This will highlight the need for care, and the need for review under H7, without blocking beneficial development.

Right of way

18. There is no obvious reason for the the development principle to require: "*The existing Public Right of Way (PRoW) must be maintained but rerouted*", it is often preferable to maintain existing routes and shape development around them. It is not good planning and undermines soundness to pre-judge such detail in the allocation. We suggest revision of the wording to state: "*The existing Public Right of Way (PRoW) must be maintained, if appropriate rerouted*" to maintain suitable flexibility for effective and sound policy.

Green Belt

19. The Council has undertaken a thorough review confirming there to be an exceptional need for revision to Green Belt boundaries to meet development needs. We agree with the conclusion of your own Green Belt assessment that the land can, and should, be regarded as grey belt and the NPPF can support allocation of the land for residential development.
20. The position of the site in the Green Belt is a consequence of its sustainable location in the hinterland of major centres. Noting the strategic objectives of the Local Plan it is considered entirely appropriate to release land in the Green Belt to provide homes in a sustainable location.
21. In the case of the proposed allocation at West Farm a large part of the site is developed featuring large buildings and hardstanding. The larger buildings have a clear association with the historic farm buildings (not in the Green Belt) and through this have legible connection with the village. The proximity of the village core and dwellings to the southwest of the proposed site that bookend the area mean its character is more of a settlement than outlying countryside. The site's developed character, and its proximity to the main village facilities, is such that it is an area the NPPF prioritises for release from the Green Belt to meet development needs (para. 148).

22. The developed site is not proximate to a town or large built-up area, it cannot therefore make a contribution under criteria a, b, or d of NPPF paragraph 143. Designations in the vicinity of the site including heritage assets are acknowledged, however none are considered fundamental barriers to development that would prevent classification of the land as grey belt.
23. The Council have identified the need to revise Green Belt boundaries arises from an exceptional development need, in the presence of this need there is no reason to expect a suitably designed scheme to conflict with heritage policies of the NPPF, or any other relating to formal designations. No non-green belt (footnote 7) designations should prevent the land being treated as grey belt.
24. The site is also well contained with defensible boundaries (the roads to the south and east, building to the west, and hedges and water bodies to the north) to prevent unplanned sprawl are required by NPPF paragraph 149. The proximity to the village centre means key services and facilities should be accessible to new residents by sustainable means, particularly active travel, it is therefore an area supported for development by NPPF paragraphs 110 and 115.

Other matters

25. There are no other constraints that make the site unsuitable for allocation.
26. The land is not an area of flood risk and benefits from frontages to two roads from which vehicular access can be taken with existing footpaths offering routes to Broad Street for walkers. Ecology and all other matters can be suitably accommodated in a development's design to ensure expected amenity standards are achieved.
27. In short, we believe the site to provide a sustainable opportunity for development. As a smaller site the proposed allocation can deliver homes early in the plan period to contribute to the Borough's housing need and support vibrant village life.

Conclusion

28. We welcome proposals to encourage growth in Rugby Borough and the proactive stance the Councils are adopting in the allocation of new development sites. We also support the proposed spatial strategy of dispersal of development to settlements around the borough, we believe this essential to sustain rural populations, facilities, and communities. Furthermore, it is necessary to satisfy the NPPF requirement to support prosperous rural areas (paragraph 83) to ensure a sound plan.
29. We support the proposed allocation of our client's land at West Farm, Brinklow as part of the site 337. The allocation can contribute required homes to the borough and support the village. The land is sustainably located to encourage active travel with direct links to the key facilities of the village core, including a medical surgery.
30. The land is considered a grey belt site and so, combined with the sustainability of location, is identified as a more suitable location for development in the Green Belt under paragraph 148 of the NPPF to meet the exceptional need identified by the Council.
31. We trust these representations are of interest and will be pleased to discuss them further.
32. We request that we are informed when the Plan is submitted for examination and wish to be notified of and participate in any following examination process.

Yours faithfully,

[Redacted signature]

David Burson LLB MSc. MRTPI
Associate

[Redacted contact information]