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)
Title	Mr	
First Name	Ian	
Last Name	Currington	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[redacted]	
Line 2		
Line 3		
Line 4		
Post Code	[redacted]	
Telephone Number	[redacted]	
E-mail Address (where relevant)	[redacted]	

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.

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?

Paragraph		Policy	Strategy S1 Settlement hierarchy	Policies Map	No

Site ID 315

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes
(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.
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The local plan is not sound.
S1 Settlement Hierarchy 1.17 states that expansion will be in rural locations such as site 315 in Brinklow.
The NPPF 187b requires recognition of the most versatile agricultural land. This has not been recgonised in the Plan for site 315 which is active food growing agricultural land in the past 3 years growing Potatoes, Maize and root vegetable. Quality agricultural land must be protected.

NPPF 187d requires protection of hedgerows and threatened spieces. The plans for site 315 require the extensive removal of hedgerows to accommodate site access. The Hedgerow half way down this field has clear animal nesting activity including Badgers.

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

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Removal of site 315 which is greenbelt quality agricultural land which is in regular use.
RBC have not provided suitable consideration to further urban extension on the edge of the town for areas outside of the protected greenbelt.
Not enough effort has been made by RBC to protect greenbelt.

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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?

Paragraph		Policy	Strategy S6 Residential allocations	Policies Map	No

Site ID 315

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes
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RBC have a clear duty to co-operate with neighbouring authorities.

Warwickshire County Council in their response in the statutory consultees are very clear that they APPOSE the dispersal strategy to rural settlements. WCC state this is not appropriate for a number of reasons relevant to Brinklow:
4.1 - will not generate enough funding to fund new infrastructure. Brinklow can only be accessed from Rugby by 1 of 2 single track historic bridges or single tack road
4.2 - not supporting active travel.
4.3 - Growth in Primary school children requiring school transport as no school in village to walk to
4.10 - Transport network impacts
RBC in the Local Plan has not mitigated against these items - in fact they seem largely ignored.

The northern part of the borough adjoins Harborough District Council, there appears to be no response in the Neighbouring Authority responses. This is important. The Harbourgh Plan 2020-2041 has 123ha of B8 warehousing assigned to Magna park which is c5 miles from Rugby.

Given this is marketed as Europe's largest distribution park, have RBC considered whether Rugby's proposed 12ha of development at Coton Park East (small in comparison) could be changed to Housing as suggested by the Conservative councellors. This would enable less housing to be considered in the dispersal policy.

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

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Ensure WCC objections to the dispersal policy are given correct consideration and focus development to land closer to Rugby Town.
Consult with Harborough Council to switch proposed B8 warehousing (not required) at Coton Park East with housing.

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No, I do not wish to participate in hearing session(s)

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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	7.2	Local Plan Policy	Wellbeing W1 Protection of community facilities	Policies Map	

Site ID

4. Do you consider the Local Plan:

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The Wellbeing section of the plan state that is supports the " restoration of Coventry Stadium, Brandon for speedway and stock car racing and
other motor sports together with other community uses." I appose this.

Whilst the notion of protection on the surface appears noble and well meaning Coventry Speedway stadium has been unused since 2016. In those 10 years the stadium has become deeply vandalized and would need very significant investment to bring it to restoration. Given Speedway attendances in Oxford of c3,500 that makes it commercially tough to achieve.

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The plan should have the ability for the land to be considered for housing use (rather than taking land out of the green belt) if the Speedway is not reinstated by a specific date. The Local Plan is not clear in identifying the stadium as being derelict and identifying specific commitments in the plan to ensure the stadium reopening is time bound and the land not left unused.

The use of the term "other community uses" is too vague and is not clear. The plan for the site should be outlined or further clarity provided.

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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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Local Plan Paragraph	6	Local Plan Policy	Strategy S6 Residential allocations	Policies Map	

Site ID 315

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The NPPF paragraph requires sufficient choice of of school place. The RBC plan for 250 homes in Brinklow is not justified as in the RBC Education Topic paper (which supports the plan) they have identified themselves that there is a shortage of school places in the Revel and Wolvey (section 10.9). RBC have not addressed this sufficiently given the plan to build 250 houses, knowing that there are not enough school places.

Warwickshire County Council in their section 18 response have disagreed with the proposed dispersal strategy across villages including Brinklow due to the increased WCC provided school transport required between Brinklow and Monks Kirby which is 3.5 miles away.

The AECOM produced RBC sustainability study (5.2.46) states the need to "carefully account for existing primary school capacity", which as above is known by RBC to be a problem for

Brinklow. Also in 5.2.46 is the need to minimise children being transported to school - ALL children over 5 from the proposed site 315 would need to be transported to school as there is no provision in Brinklow beyond reception.

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