

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="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Mary"/>	<input type="text"/>
Last Name	<input type="text" value="Fletcher"/>	<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"/>	<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"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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

Name or Organisation: **Paul Fletcher**

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

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

4. Do you consider the Local Plan:

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

Regarding Site 315 (Brinklow site south of Rugby Road)

With 250 dwellings proposed on greenbelt land, Site 315 in Brinklow is big enough to consider in relation to its impacts on preparation of the overall Local Plan.

I do not believe the Duty to Cooperate has been properly fulfilled because:

- I understand there was no specific consultation with Brinklow Parish Council on expanding Brinklow's Settlement Boundary*
- Our Parish council recorded frustration that a community meeting on February 9th left many questions unanswered*
- This submission form process is complex and must surely deter many responders.*

I do not believe the Draft Local Plan is Sound because:

- Exceptional circumstances for revising green belt boundaries have not been fully justified. [NPPF para 145].*

- *The development would use productive agricultural land and is likely to adversely impact air quality due to increased traffic especially at the A428 /Heath Lane Junction. [Ref NPPF paras 187 b&d]*
- *The 50% increase in housing (70% if site 337 is also developed) will significantly dilute the character and identity of the village. [Ref NPPF paras 8c & 203]*
- *This development is not consistent with the aim of sustainable development. Brinklow residents are heavily reliant on car travel, Brinklow does not have a primary school (only a reception class) and the doctor's surgery is already at capacity. [Ref NPPF para 11a]*
- *The road junctions in Brinklow of A428 with both Main Street and Heath lane are already congested at peak times and additional access for site 315 (and 337) would exacerbate this. This would also impact congestion at Bretford bridge where the Fosse Way crosses the river Avon. This impact does not appear to have been assessed.*

(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.

Updates to the Local Plan should:

- *Remove or significantly reduce the proposed development of Site 315.*
- *Look at developing the alternative sites proposed by Brinklow Parish Council.*
- *Prioritise development of brownfield sites that will enhance the area. Whilst the plan does include such sites in Rugby, it is important to ensure that these are developed before using potentially easier to develop green field sites.*
- *If a development of this scale is to go ahead it would require a 30 year plan that demonstrates how infrastructure and services are to be provided for Brinklow, [given the significant increase in the number of properties].*

(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:

N/A

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.

N/A

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>