

## 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 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto: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="PAUL"/>	<input type="text"/>
Last Name	<input type="text" value="FLETCHER"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value=""/>	<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"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value=""/>	<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	<b>315</b>				

4. Do you consider the Local Plan:

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

*With 250 dwellings proposed on Greenbelt land, Site 315 in Brinklow is big enough to consider in relation to preparation of the overall Local Plan:*

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

- *Our Parish Council have explained how they 'have not been listened to'*
- *They recorded frustration that a community meeting on February 9<sup>th</sup> left many questions unanswered*
- *I understand there was no specific consultation on expanding Brinklow Settlement Boundary*

*This submission form process is complex and **must surely deter many responders.***

- *One cannot feel confident that 'something else' doesn't invalidate one's objections. Navigating the many layers of applicable documents and legislation would require experience, expertise and resources beyond the reach of many groups, let alone individuals.*
- *The form is also confusing and unclear. For example, whereas the Planning Inspectorate Guidelines (PIG) list the duty to cooperate to as part of the legal guidelines, this form (paragraph 5 above) separates them out.*
- *The PIG does not specify using this form; to fully cooperate RBC – being experienced - should categorise the responses from simple letters. Writing letters would be easier for responders, but according to the 'Have Your Say' website page these are not being admitted.*

*I do not believe the Draft Local Plan is Sound or Positively Prepared because:*

*The proposals for Site 315 contravene several policies in the National Planning Policy Framework (NPPF paragraphs in brackets). The Draft Local Plan does not:*

- *Justify Exceptional Circumstances to take Greenbelt land (145).*
- *Consider the impacts on Sustainability (77, 83), Loss of Heritage and Character, Environment (8c), traffic (110), nor the consequent need to improve infrastructure (11a, 22).*
  - *250 houses would be over 50% increase vs Brinklow today.*
  - *Cars are absolutely essential for people in Brinklow. The roads are frequently already full, in terms of junctions, traffic queues and parked vehicles. When large tractors, buses or lorries pass through there is often temporary gridlock. Surely a new layout with additional roads and car parking would be necessary, especially with Site 315's access being opposite the main junction.*
- *Consider the increased Schools (100) and Healthcare provision that would be needed. Again, both are currently full. I understand that Brinklow was wrongly listed as having a Primary School in the Site Selection process, when it only has a reception class.*

*The Draft Local Plan actually makes development of other Brownfield sites less likely - such as in Rugby Town Centre:*

- *Releasing large Greenfield sites, such as this one, offers easier and cheaper opportunities for developers, as less site clearance is required.*
- *In addition, the Greenfield sites' allocations currently place less onerous infrastructure requirements on potential developers than do the Brownfield ones in Rugby.*

*This lack of urban Brownfield development would prevent the economic regeneration the town centre has needed for many years.*

*Development of Greenbelt land instead is obviously worse from an environmental and sustainability standpoint, both in terms of habitat loss and the need for additional roads, traffic etc.*

*(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 Draft Local Plan should:*

- *Delete development of Site 315 entirely.*
- *Actively promote development of Brownfield sites, especially urban ones, otherwise such development simply won't happen.*
  - *Set specific criteria for release of Greenfield sites. It should be contingent on development **being actually underway** of at least corresponding numbers of dwellings on Brownfield sites.*

- For Greenbelt sites specify full contributions from potential developers to cover redevelopment of road, parking, school and healthcare, and any other infrastructure provision.
- For Brownfield sites reduce the required infrastructure contributions from potential developers.

(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>

## 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		Local Plan Policy		Policies Map	
Site ID	<b>337</b>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	✓
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes		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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*Site 337 in Brinklow has 'only' c.75 dwellings to be built around farm premises. However if both it and Site 315 were developed, the combined impact would be enormous:*

- A 70% increase in dwellings.*
- Access traffic from both sites concentrated by the main junction.*

*Considering Site 337 in isolation must assume Site 315 is not developed. My comments on the overall Local Plan and consultation process still apply, but I will not repeat them here.*

*I support:*

- Repurposing of Brownfield land, especially if it is within the current settlement boundary*
- Conversion of existing farm buildings*
- Provision of accommodation for those over 55, to allow 'downsizing' to release larger properties for others*
- Provision of smaller accommodation for local young people*

*I do not support* permitting 75 dwellings, this is too many.

*Brinklow's existing roads, junctions, car parking, schools and healthcare are already basically full.*

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

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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.

*Development of Site 337 should be confined to the conversion of farm buildings, without any new bungalows or other buildings, giving around half as many dwellings.*

*In my view, this would significantly improve the sustainability, due to lower impacts on traffic, schools and healthcare.*

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

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