

## 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.*

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

#### 2. Agent's Details (if applicable)

(where relevant)

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

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Name or Organisation: Mr W Whiting

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

Local Plan Paragraph	<input checked="" type="checkbox"/>	Local Plan Policy	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>
Site ID	<input checked="" type="checkbox"/>				

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.

Please see attached written correspondence

(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 written correspondence

(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>

Proposed Submission Consultation  
Development Strategy Team  
Town Hall  
Evreux Way  
Rugby  
CV21 2RR

**Re: Rugby Borough Council Proposed Submission Local Plan  
Consultation Regulation 19– Grand Union Canal Transfer Project**

Mott MacDonald  
10 Livery Street  
Birmingham B3 2NU  
United Kingdom

T +44 (0)121 234 1500  
mottmac.com

4<sup>th</sup> March 2026

To whom it may concern,

Severn Trent, Affinity Water and the Canal & River Trust ('the Trust') are working together on the Grand Union Canal Transfer Project ('the Project'). This response is on behalf of both water companies and the Trust in their role as Project Partners. For the avoidance of doubt, the response is separate from, and does not prejudice, any representation submitted by the partners individually on this matter or any other related consultations.

The Canal & River Trust ('the Trust') is a statutory consultee within the development management process and the Government has proposed that it should become a Specific Consultation Body for Local Plan making within the new plan making system when it is introduced in early 2026. The Trust should continue to be consulted, and will respond, separately and individually on the implications of, and opportunities presented by, the developments proposed and draft policies in the emerging Local Plan.

As will be noted, the Project is not raising any specific comments on the proposed submission (Regulation 19) but is rather seeking to raise awareness of the Project and the strategic importance of it, and to ensure that the Project is appropriately taken account of in the remainder of the Local Plan Review.

The Project starts at the existing Minworth Wastewater Recycling Centre (WwRC) within the Birmingham City Council area, where water is planned to be transferred via a new pipeline to Atherstone within the North Warwickshire Borough Council area. It will then begin its journey along the Coventry, Oxford and then the Grand Union canals. The water from Minworth's WwRC will be treated recycled water, which would usually be discharged into the River Tame. Under the Project, some of this recycled water will be diverted to a new Advanced Water Treatment Plant within the Minworth WwRC site to bring it to the required quality for transfer through the canal network.

Once it has been transferred through the canal network, the water will be piped from the canal, stored and treated again at a proposed new water treatment works southeast of Milton Keynes, before being transferred via a new buried

pipeline as clean drinking water into Affinity Water's supply network for customers from an existing covered reservoir near Luton.

The Project is a central component of both the Water Resources in the South East (WRSE) Regional Plan and Affinity Water's statutory Water Resources Management Plan (WRMP) 2024 in respect of providing water resilience for Affinity Water customers in Hertfordshire and North West London. It is also part of the Regulators' Alliance for Progressing Infrastructure Development's (RAPID) programme of Strategic Resource Options (SROs) to help meet the water needs set out in the Environment Agency's National Framework, that will benefit customers and wider society and help to protect and enhance the environment.

On 1st October 2024 the Secretary of State for Environment, Food and Rural Affairs gave a direction under section 35 of the Planning Act 2008 that the Project is to be treated as a development for which development consent is required because it is of national importance. The Project has been registered with the Planning Inspectorate and is listed on the National Infrastructure Project web pages here <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/WA0210001>.

The Project held its first phase of public consultation in September/October 2024. The Project has now entered its second phase of public consultation, which is running for a seven-week period from 11<sup>th</sup> February to 2<sup>nd</sup> April 2026, with more detail available here: [Consultation 2026 - Grand Union Canal Transfer](#). We would welcome the Council's responses to this consultation. Following the close of this consultation, a report will be prepared summarising the feedback received.

As already indicated, a proportion of the works associated with the proposed Project fall within the administrative area of Rugby Borough Council. Relevant proposed works include targeted canal bank raising and modification in connection with the transfer of water through this area, alterations to existing weirs within the borough, works to provide a new transfer lock near Grimes bridge (Colehurst Lane) north of Brinklow, and the construction of a pumped lock bypass (including a new pumping station) at Hillmorton. Some ancillary works will also be required, including the establishment of temporary construction compounds along the route of the transfer. Large sections of the canal corridor, particularly within Rugby's Settlement boundary, are not proposed to be subject to any works.

Further detail of the Proposed elements of the Project is currently being provided through the second phase public consultation, and the Project Partners request that the Project is appropriately taken account of in the ongoing revisions of the Council's Local Plan. We would welcome continued dialogue with the council through the remainder of the Local Plan Review.

Yours faithfully,

**Will Whiting**  
Central Area Deputy Planning Lead (GUC  
Transfer)

[Redacted]

[Redacted]