

## 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

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

E-mail Address

(where relevant)

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

Name or Organisation:

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

**The plan does not refer to the level of significant evidence and data that must be required for such a major development and expansion of a rural village and also takes no account of pre existing village plan 2022.I can find no evidence that the officers have identified reliable evidence or that they have considered the many alternatives that exist within the village for smaller scale development.**

**There has been a lack of evidence at both public village meetings. It is unclear why this development is being considered in the light of available evidence .**

Under Para 8c of NPPF, the sites 315 and 337 do not enhance the historic environment – moreover the scale of expansion in Brinklow will cause irreversible harm to the landscape setting, village character and settlement identity, a 70% increase in properties can clearly not be sustained within a small village and will destroy village as such.

Under Para 11a

All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment. The local plan has no regard to the evidence gathered in the preparation of the Neighbourhood Plan. The reason for this is that the Neighbourhood Plan has to align with the Local Plan, but there is no evidence to

suggest that there is the need for this level of growth.

The village relies on car travel, lacks access to schools, has healthcare at capacity. Nor do the plans align with the assessed need identified in Brinklow's Neighbourhood Plan. The increase in car journeys along with the known expansion of industrial and storage sites locally will cause further gridlock in Brinklow. We have seen no valid modelling of the traffic densities that would result from this development that support the plan. The healthcare facility is at a maximum and there is no plan for additional school places thus increasing the risk for children travelling through the village at peak times.

A 70% increase in the size of the village should be considered to be a significant extension, but we have not seen a 30-year plan for how essential services and infrastructure will be provided. The plan has failed to justify why growth of this magnitude is appropriate. It is completely disproportionate and not seen at this scale anywhere else in such a rural location in the plan area

In relation to Paragraph 77 from the NPPF, there are issues with the design of sites 337 and 315 with both needing access onto Coventry road. There is no evident infrastructure plan, there are major constraints to traffic at Bretford bridge, Green Lane, Heath Lane. The junction with Broad Street and Coventry Road part of the Fosse way is the site of many near misses and hazardous to say the least. Residents have strongly expressed concerns regarding all of the above. Officers were unable to answer these questions.

In relation to `Para 83 of NPPF

An 70% expansion risks overwhelming local services rather than supporting them — especially where growth far exceeds local need as must indeed be the case in Brinklow

Heath, Schools, Scale

In relation to Para 100 NPPF since there is only a reception class in Brinklow it means that every child will have to access education by car, or their nearest school via publicly funded school transport. This limits choice, particularly for families who don't have the luxury of driving their children to school. It appears to be something officers were unaware of at their presentation.

In relation to Para 110 NPPF Car ownership is essential in Brinklow due to the rural locality and limited public transport choice; there are no active travel options in the village. All surrounding roads are unlit with very few, if any pavements. The location can't be made more sustainable due to the over 2-mile distance to the next nearest village. The stretch of road between Broad street junction with Coventry road and the access road to site 315 will be particularly hazardous.

In relation para 145 NPPF I have copied in full this para as it is vital that this point be fully understood

Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through Strategic policies. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through policies, including neighbourhood plans.

Exceptional circumstances have not been fully evidenced and justified. Following the

S18 consultation and a reduced house supply being required and additional brownfield sites identified in Rugby, RBC didn't take out all of the Green Belt sites, instead it made unjustified and un-evidenced choices to remove sites in non-Green Belt locations. These decisions do not result in a justification for building on Green Belt land. This issue should be fully explored through the examination process of the plan.

Landscape, Green Belt, Scale

In relation to Para 187, Sites 337 and 315 will destroy landscapes from Brinklow's conservation area and scheduled monument. Scheduled monuments are important heritage assets and must have significant regard. Furthermore, views in and out of the conservation area are critical components of its character, which is key to maintaining the special historic interest of Brinklow.

Site 315 is food-productive agricultural land which will be permanently removed from our food chain

Site 315 the site promoter's ecology assessment has been ignored by the promoter in order to create a secondary access to the site on to a single-track lane. This has not been challenged by RBC.

In relation ~Para 203

Heritage assets are at risk from increased traffic using Ell Lane as a rat run around the village.

Landscapes from heritage asset and conservation area will be permanently harmed. Cultural heritage of the village at risk by being overwhelmed by an 70% increase in dwellings

Key cultural events will not be able to go ahead any more as land used in the events e.g. Brinklow's Scarecrow Festival will not be available. A 70% increase in residences will inevitably impact on these sites and traffic increase alone will be extremely damaging

**I fully support the Parish councils response and will not add further to their points regarding Education and health which are very well evidenced and I fully support the points they make below**

The selection of Brinklow ignores Warwickshire's recent dictate that it will not spend any more of its budget on school transport.... children age 5/6 and above will have to walk to Monks Kirby on a journey with no street lights and very limited pavements. This will mean that to protect children's safety more car journeys will be undertaken, which will make the traffic congestion already experienced considerably worse during peak times. The coaches used on this school transport reverse turn in unsuitable places in our opinion a very dangerous maneuverer. Additional coaches will be needed for the additional 100 children the development will bring. Warwickshire have said they will not pay.



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The proposal under the RBC local plan to add 325 residential dwellings to Brinklow, an increase of over 70%, is considered unsound from a transport and highways perspective and in contradiction of paragraphs 77, 110 and 203 of the National Planning Policy Framework (NPPF).

**Background**

Brinklow is a small rural village of only 464 dwellings (RBC Rural Sustainability Study), situated at a junction converging the B4455 (Fosse Way) and B4428 (Coventry Road / Lutterworth Road (Broad Street)). Main roads are already heavily congested at peak times through a combination of motor vehicle / HGV (Magna Park) and agricultural traffic.

**Traffic Survey**

Some of the information to prepare a sound local plan is still missing. For Brinklow, which is already submerged in an excessive flow of traffic, the Local Highway Authority's Strategic Transport Assessment (STA) would have been critical in allocating

new sites. Brinklow Parish Council has been verbally assured by RBC that transport assessments have been completed but these have never been provided. Accordingly, Brinklow Parish Council undertook its own assessment in May 2025.

Concerning the subject proposal are extra traffic effects from sites 315 and 337 that access Coventry Road and Rugby Road would result in excessive queues and severe delays. Furthermore, the effects of extra traffic at secondary access points to Heath Lane and Green Lane put pedestrians at risk and could result in more accidents. This is because Green Lane is a single-track road with no footpath or street lighting.

From the surveys undertaken, the peak traffic location in Brinklow is Rugby Road, which takes up to 900 movements per hour. Both of the proposed development sites will egress at this location and will be directly opposite each other. The current road network will struggle to cope at peak time. Brinklow is an increasingly business thoroughfare with close proximity to Magna Park and also the proposed Fraser Group HQ at Ansty, which this survey does not account.

Based on current data from ([www.gov.uk](http://www.gov.uk)) the average number of cars per household is 1.21. The subject proposal can reasonably be assumed to increase the number of resident cars from 561 (464 x 1.21) to 978 (789 x 1.21), an unsustainable increase of >70%. The significant increase in cars will contribute significantly to additional highway congestion.

In the local plan there is reference to RBC having cleared highway concerns with Warwickshire County Council (WCC). This is incorrect with WCC advising further surveys are required to gain comfort from the proposal.

### **Bretford Bridge**

The B4455 (Fosse way) is a key highway route through Warwickshire, connecting Rugby to Coventry and key infrastructure such as the M6 and Coventry and Warwickshire Hospital. A significant risk however is the road crossing the River Avon at The Bretford Bridge, being a Grade II listed single carriageway bridge. There is already significant congestion at this bridge, with traffic regularly backing up along the Fosse.

This risk increases as the volume of cars increases, as proposed by the housing proposal for Brinklow, Long Lawford and Wolvey, as well as the already consented HQ development for the Fraser Group at Ansty.

Due to the construction of the bridge from sandstone, ashlar and brick patching there is a regular need for closure for maintenance as demonstrated in 2025 when the bridge was closed for multiple months creating significant disruption.

### **Village Highways**

As a small village of only 464 dwellings Brinklow village highway infrastructure is immature and undeveloped. Most residential dwellings are located on the lanes of Heath Lane, Green Lane and off Broad Street and Great Balance.

Whilst site 337 feeds directly onto Coventry Road, Site 315 is proposed to have access/egress off Coventry Road and Green Lane. Green Lane is a very narrow single-track road unsuitable for significant development. More extensive highway use has not been surveyed and approved by WCC. The lane has residential dwellings directly abutting the highway, so it is not broadly capable of improvement.

Similar challenges exist in respect of the village surgery, which is accessed Barr Lane, which has no pavement, is a single-track lane and has limited lighting. During GP opening hours Barr Lane is excessively congested (see photo) and dangerous with car

movements blocking access and regress.

This matter was raised with RBC during the Regulation 18 consultation but dismissed with rhetoric, people will not drive to the GP but will walk. This stance is entirely non practical due to:

- i) ill and infirm people and those elderly and juvenile will not walk to a doctor but will rely on transport.
- ii) Highway access is dangerous for greater use whether vehicle or pedestrian.

### **Car Reliance**

Under the NPPF there is reference to ensuring developments mitigate reliance on personal motor transport. In Brinklow there is considerable reliance on personal transportation due to limited public transport infrastructure, with the village limited to three bus routes. Personal transport is therefore essential for work/commute/social and leisure/education. The proposal for building a significant number of additional homes with absolute reliance on personal transport is therefore contrary to policy.

### **Active Travel**

Under the NPPF, development is recommended in locations where there is less dependency on personal transport and there are options for active travel. Around Brinklow there are no cycle ways, safe pedestrian footpaths or bridle ways that suitably connect the village to other villages, towns or cities without reliance on cars. Local primary schools are over 5km away from Brinklow. Roads are unlit and pavements do not cover full distance. Roads are busy and traffic speeds (as per Brinklow's traffic survey) are regularly excessive. Walking to primary school is therefore not feasible. Equally secondary schools are almost 10km away from Brinklow. Similar challenges exist and are exceeded with the distance not being practical or appropriate. Options and opportunities for active travel are therefore considered limited and impractical, meaning reliance remains with motor vehicles and personal means of transport.

### **Conclusion**

In summary, from a highways and traffic perspective it is recommended the proposal is unsound and conflicts with numerous paragraphs of the NPPF.

Brinklow already experiences challenging highways and traffic infrastructure being a rural village with effective 100% reliance on personal transportation. The scale of the proposal is considered disproportionate to the village with no risk mitigations proposed through investment in infrastructure improvements.

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### **Green Belt**

The proposal to construct 325 new dwellings in Brinklow, in the heart of greenbelt land, is a direct contradiction to policy to protect and preserve green belt and is also at odds with the NPPF.

The draft local plan seeks to allocate over 1500 new dwellings to green belt land. This does not protect the green belt. There are development options outside of green belt land that should be focused on, including a greater volume in Rugby Town. The subject

proposal increases Rugby dwellings by 2% compared to a village like Brinklow at 70%. This is unreasonable and unjustified.

#### **Ridge and Furrow**

The proposal, especially site 315, proposes to dissect a field of heritage importance with ridge and furrow landscape. Conservation and landscape policy is to protect such sites, but this proposal proposes an access road and new dwellings over historically sensitive landscape that will destroy such landscape.

#### **Conservation Area**

Site 337 is within the Brinklow conservation area with site 315 directly opposite. Development of these sites with the proposed intensity of residential dwellings will negatively impact on the historical importance and heritage of the sensitive and protected area.

#### **National Monument**

Brinklow Castle (The Tump) is a designated National Monument and protected under the Ancient Monuments and Archaeological Areas Act 1979. The proposal of site 315 and 337 interferes with views to and from the monument and site 337 directly abuts the monument. Site 315 has been historically declined for planning development with reference to the aesthetics of the monument part of direct feedback for planning refusal by RBC.

#### **Listed Buildings**

Site 337 directly abuts listed residential properties. Development of this site will adversely impact these properties and derogate their historical importance in contradiction with conservation and heritage policy.

#### **Flooding**

In recent years the village has been subject to flooding events (as shown in attached photos). Site 337 has been particularly susceptible to flooding as have the surrounding roads of Heath Lane and Green Lane, as well as properties on Coventry Road. Removing grass fields, hedgerows and trees, and replacing them with concrete will exasperate the risk of further flooding.

Surface water flooding has also been caused by inadequate and historically dated sewer and drainage systems. Not only has overflow of such systems increased the intensity of flood risks but also of sewer overflow. Raw sewage overflow has occurred on numerous occasions alongside flood events on Barr Lane, Heath Lane and Green Lane. An increased number of dwellings feeding into existing systems will enhance risks and regularity of occurrence to the detriment of the village population.



In summary, from an environment and heritage perspective it is recommended the proposal is unsound and conflicts with environmental, conservation and heritage policy and numerous paragraphs of the NPPF.

Most critically Brinklow is situated proudly in protected greenbelt, which is also valuable and productive farmland that should be maintained for generations to come. This land is essential to protect boundaries between towns and to protect and conserve landscape, wildlife and flora and fauna. The proposal to destroy protected land to develop sites 315 and 337, with a significant intensity of new dwellings that increase the village scale by >70%, is very clearly in contradiction to existing policy frameworks. This site ignores the fact that the land is green belt, or perhaps recently wrongly classified as grey belt and also recognised by Warwickshire CC as “ridge & furrow”.

RBC have failed to talk to the land owners, BPC have interviewed the land owner who will provide the land for the access road, and he has stated that he will not sell a part of his field for access.... it's the whole site or nothing.

**With only one access road on Heath Lane available this site becomes undevelopable and undeliverable.**

Brinklow has a known flooding risk, particularly at the Heath Lane /Coventry Road junction, and at the Green Lane/Coventry Road junction. Internal flooding of domestic properties has only just been avoided in the last few years; no actions have been taken to ensure the under-capacity is remedied.

The statement made by Severn Trent only confirms our position on the very edge of the flood plain.

Brinklow is a comparatively small Village, but as a Main Rural Settlement is has been unfairly selected to take a far greater proportion of the new housing allocation than other Villages (see chart below).

The people of Brinklow value the Heritage which is embedded within the Village, where 36 listed building can be found, adjacent to the 12th century SSSI Brinklow

Castle. English Heritage place emphasis on the views to and from the castle, and recognise that it's a central part of Brinklow's environment.

(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.

I fully support the alternative sites suggested by Brinklow Parish Council following it's consultation with local residents and do not add further to this and do so on the basis what they suggest is sustainable and at correct scale for a village of this size

(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

**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:

I feel it important to have an informed member of the village community present at the hearing

***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 I have not used AI, I have referred in part to content from Brinklow PC throughout my submission**

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>