

## 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

(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:

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

Local Plan Paragraph		Local Plan Policy	S6	Policies Map	
Site ID	3				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	
(2) is Sound	Yes		No	x
(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.

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.

On behalf of my client, I consider the plan to be unsound. The plan should include the allocation of site ref 3 land west of Lutterworth Road, Brinklow within the list of residential allocations in policy S6.

Policy S1 Settlement hierarchy confirms the status of Brinklow as a "main rural settlement" which is expected to accommodate development allocated through the plan (and indeed two major residential developments are proposed to be allocated elsewhere in Brinklow).

The Council's HELAA assessment concludes that this site (ref 3) is "suitable, achievable and available", with a potential yield of 29 residential units and the site has not been discounted from the assessment.

Whilst the site is currently allocated in the Brinklow Neighbourhood Plan for up to 12 affordable houses and up to 7 elderly persons dwellings, the site is clearly suitable for unrestricted open market housing, along with policy compliant affordable housing

provision. The Council's decision not to allocate the site is perverse in light of the HELAA conclusions that the site is "suitable, achievable and available".

A pre-application enquiry has been submitted to the Council and the officer's response is anticipated in the very near future. This supports the conclusions of the HELAA that the site is available and that a development of up to 20 dwellings is achievable within five years, boosting the Council's housing land supply position at a time of existing shortfall.

(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.

Policy S6 should be amended to include the allocation of this site for a residential development of up to 20 unrestricted open market houses with policy compliant affordable housing provision.

(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:

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To explain these points to the Inspector.

**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-notices>