

## 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="Peter"/>	<input type="text"/>
Last Name	<input type="text" value="Clegg"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/> (where relevant)
Organisation (where relevant)	<input type="text" value=""/>	<input type="text"/> (where relevant)
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<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)

## 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

Local Plan Policy

Policies Map

Site ID

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.

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.

We set out our objections to the general approach taken to new residential allocations under Policy S6 under a separate form, including concerns related to the amount of allocation on Green Belt land and the need for a more sustainable distribution of housing numbers.

In addition to these more general objections, we object to the specific allocation of 250 residential dwellings on Land south of Rugby Road, Brinklow, alongside our objection to site allocation ID 337 West Farm and Home Farm, Brinklow, under separate cover.

We consider that the allocation is not sound. Having regard to paragraph 36 of the National Planning Policy Framework (NPPF), we consider that the approach is not justified taking account of the reasonable alternatives and based on proportionate evidence; and is not consistent with national policy in that it will not deliver sustainable development in accordance with national planning policy.

The NPPF sets out the relevant planning policy framework for the preparation of the plan. Section 2 refers to achieving sustainable development, which paragraph 7 notes includes the provision of homes, commercial development and supporting infrastructure in a sustainable manner. Paragraph 5 indicates that achieving sustainable development means the planning system has three overarching

objectives: a) an economic objective; b) a social objective; and c) an environmental objective. Under b) it is noted that the social objective is to help build a strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.

Paragraph 11 indicates that for plan making, all plans should promote a sustainable pattern of development, including meeting the development needs of their area and aligning growth and infrastructure. Paragraph 20 describes how strategic policies should set out an overall strategy for the pattern, scale and design of development and make sufficient provision for, inter alia, community facilities such as health, education and cultural infrastructure. Paragraph 29 indicates that non-strategic policies should set out detailed policies for specific areas including allocating sites and the provision of infrastructure and community facilities at a local level.

Section 11 of the NPPF refers to making effective use of land, paragraph 124 of which indicates that planning policies should promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions.

Having regard to the above, we do not consider that site 315 is a sustainable location for the allocation of 250 houses. Aside from the fact that the site is located on Green Belt land, the proposed allocation will result in a significant disproportionate increase in the size of the village leading to increased pressure on local services, including local schools, health facilities and infrastructure.

The village of Monks Kirby provides the nearest primary school to Brinklow which the children of new residential development will draw upon for primary education. We understand it is estimated that the new residential allocations will give rise to around 75 additional school children to be accommodated.

The roads within and around the village of Monks Kirby already suffer from significant congestion at school drop off and pick up times and at school events and any expansion of the school numbers will exacerbate these current difficulties to the detriment of local communities.

The increased congestion on surrounding roads, along with the impact of increased traffic from commercial development along the A5, will also result in increased 'wear and tear' on roads which already suffer from recurring potholes.

The proposed new housing will also put increased pressure on local health services. The Revel GP surgery in Brinklow is a small rural surgery which already caters for a large area serving not just Brinklow but also surrounding villages. Meanwhile, Coventry and Warwickshire University Hospital is at breaking point and under crisis whilst the Hospital of St Cross in Rugby has limited resources.

(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.

We do not consider that the site within the village of Brinklow is a sustainable location for this allocation having regard to the above and alternative provision should be found in a more suitable location.

(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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**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.

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representation you wish to make.

### Part A

#### 1. Personal Details\*

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

Title	<input type="text" value="Mr"/>	<input type="text"/>
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## 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	S6 – Residential Allocations	Policies Map	<input type="text"/>
Site ID	337				

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 type="checkbox"/>	No	<input checked="" 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.

We set out our objections to the general approach taken to new residential allocations under Policy S6 under a separate form, including concerns related to the amount of allocation on Green Belt land and the need for a more sustainable distribution of housing numbers.

In addition to these more general objections, we object to the specific allocation of 75 residential dwellings on land at West Farm and Home Farm, Brinklow, alongside our objection to site allocation ID 315 at Land south of Rugby Road, Brinklow under separate cover.

We consider that the allocation is not sound. Having regard to paragraph 36 of the National Planning Policy Framework (NPPF), we consider that the approach is not justified taking account of the reasonable alternatives and based on proportionate evidence; and is not consistent with national policy in that it will not deliver sustainable development in accordance with national planning policy.

The NPPF sets out the relevant planning policy framework for the preparation of the plan. Section 2 refers to achieving sustainable development, which paragraph 7 notes includes the provision of homes, commercial development and supporting infrastructure in a sustainable manner. Paragraph 5 indicates that achieving sustainable development means the planning system has three overarching

objectives: a) an economic objective; b) a social objective; and c) an environmental objective. Under b) it is noted that the social objective is to help build a strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.

Paragraph 11 indicates that for plan making, all plans should promote a sustainable pattern of development, including meeting the development needs of their area and aligning growth and infrastructure. Paragraph 20 describes how strategic policies should set out an overall strategy for the pattern, scale and design of development and make sufficient provision for, inter alia, community facilities such as health, education and cultural infrastructure. Paragraph 29 indicates that non-strategic policies should set out detailed policies for specific areas including allocating sites and the provision of infrastructure and community facilities at a local level.

Section 11 of the NPPF refers to making effective use of land, paragraph 124 of which indicates that planning policies should promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions.

Having regard to the above, we do not consider that site 337 is a sustainable location for the allocation of 75 residential dwellings. Aside from the fact that the site is located on Green Belt land, along with site ID 315, the proposed allocation will result in a significant disproportionate increase in the size of the village leading to increased pressure on local services, including potentially local schools, health facilities and infrastructure.

The village of Monks Kirby provides the nearest primary school to Brinklow which the children of new residential development will draw upon for primary education. We understand it is estimated that the new residential allocations at Brinklow will give rise to around 75 additional school children to be accommodated.

The roads within and around the village of Monks Kirby already suffers from significant congestion at school drop off and pick up times and at school events and any expansion of the school numbers will exacerbate these current difficulties to the detriment of local communities.

The increased congestion on surrounding roads, along with the impact of increased traffic from commercial development along the A5, will also result in increased 'wear and tear' on roads which already suffer from recurring potholes.

The proposed new housing will also put increased pressure on local health services. The Revel GP surgery in Brinklow is a small rural surgery which already caters for a large area serving not just Brinklow but also surrounding villages. Meanwhile, Coventry and Warwickshire University Hospital is at breaking point and under crisis whilst the Hospital of St Cross in Rugby has limited resources.

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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.

We do not consider that the site within the village of Brinklow is a sustainable location for this allocation having regard to the above and alternative provision should be found in a more suitable location.

(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)

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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)

(where relevant)

(where relevant)

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	S6 – Residential Allocations	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

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 type="checkbox"/>	No	<input checked="" 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.

We consider that the distribution of residential allocations under Policy S6 is not sound. Having regard to paragraph 36 of the National Planning Policy Framework (NPPF), we consider that the approach is not justified taking account of the reasonable alternatives and based on proportionate evidence; and is not consistent with national policy in that it will not deliver sustainable development in accordance with national planning policy.

Whilst we acknowledge the overall increased allocation of sites in the urban area from that set out at the Preferred Options consultation, we remain concerned that the overall proportion of new housing allocations on Green Belt land remains the same. By our calculation, of the 2,886 residential units allocated under Policy S6, 1,478 are to be allocated on existing Green Belt land, representing over 51% of the allocated numbers, the same proportion as under the Preferred Options consultation.

The NPPF sets out the relevant planning policy framework for the preparation of the plan. Section 11 refers to making effective use of land, paragraph 124 of which indicates that planning policies should promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. It is noted that strategic policies should set out a clear strategy for accommodating assessed needs in a way that makes as much use as

possible of previously developed or 'brownfield' land. Paragraph 125 describes how policies and decisions should, inter alia, give substantial weight to the value of using suitable brownfield land within settlements; and promote and support the development of under-utilised land and buildings.

Section 13 of the NPPF refers to protecting Green Belt land. Paragraph 145 confirms that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Paragraph 147 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development and that this will be assessed through the examination of its strategic policies.

It is important that the Council's evidence in this regard is fully tested through the local plan examination. We would highlight that other than allocations at Newton Manor Lane (Site ID 59), Clifton upon Dunmore (Site IDs 129, 202 and 307) and Houlton (Site ID 338), no other Green Field sites are allocated in areas to the southeast of the Borough, which are not covered by Green Belt. This includes Dunchurch which the main rural settlement with the highest sustainability score as recognised in the Council's Rural Sustainability Study (December 2024). We calculate that the Green Field allocations to the southeast of the Borough amount to 685 units compared to 1478 units allocated on Green Belt land in the northwest of the Borough.

Furthermore, we object more generally to the distribution of housing numbers in the Main Rural Settlements having regard to the sustainability scores set out in the Rural Sustainability Study. The Main Rural Settlements are highlighted blue in the Settlement Rankings table at page 11, with sustainability scores for access to services, public transport and internet, followed by an over score. We note the overall scores below with corresponding allocation of housing numbers under Policy S6:

Dunchurch – score 49 – 0 dwellings

Binley Woods (adjacent) – score 47 - 43 dwellings

Wolston – score 45 – 95 dwellings

Brinklow – score 44 – 325 dwellings

Long Lawford – score 38 - 655 dwellings

Stretton-on-Dunsmore – score 38 - 113 dwellings

Clifton on Dunsmore – score 36 – 150 dwellings

Ryton-on-Dunsmore – score 36 - 37 dwellings

Wolvey – score 35 – 210 dwellings

Based on the above, the five settlements with an over sustainability score of less than 40 account for over 71% of the housing allocation numbers with the top four settlements with scores of over 40 accounting for the balance of 29%.

Brinklow at 325 units accounts for 70% of the allocated numbers in the top four settlements even though it is the least sustainable of the 4, whereas Dunchurch has no allocated housing even though it is the most sustainable of all the Rural Settlements.

Wolvey also stands out in accommodating 210 new dwellings representing 13% of the total allocation to the Main Rural Settlements, even though it has the lowest sustainable score of the Main Rural Settlements,

(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.

To make the Local Plan sound, the distribution of new housing allocations under Policy S6 should be reviewed and adjusted to ensure a more sustainable pattern of housing development. New housing development should be further focussed on brownfield sites within and on the edge of the urban areas in the first instance before then looking towards a more appropriate distribution of housing in the main rural settlements having regard to their sustainability score.

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