

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 13th March 2026
By email to: 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)

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	59				

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.

See attached.

(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.

See attached.

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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)

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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.

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

Name or Organisation:

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Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	95				

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(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"/>
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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	<input type="text" value="S2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text" value="x"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text" value="x"/>	No	<input type="text"/>
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Your Ref:
Our Ref: LWP71



Lucy White Planning Limited
49 West Town Road
Backwell
BS48 3HG

By email: localplan@rugby.gov.uk

11 March 2026

Dear Sirs,

**RUGBY LOCAL PLAN REGULATION 19 - REPRESENTATIONS ON BEHALF OF NATIONAL GRID
ELECTRICITY DISTRIBUTION PLC**

These representations are prepared on behalf of National Grid Electricity Distribution Plc (NGED) (formerly Western Power Distribution Plc), in response to the Rugby Local Plan Regulation 19, which is subject to public consultation.

Introduction

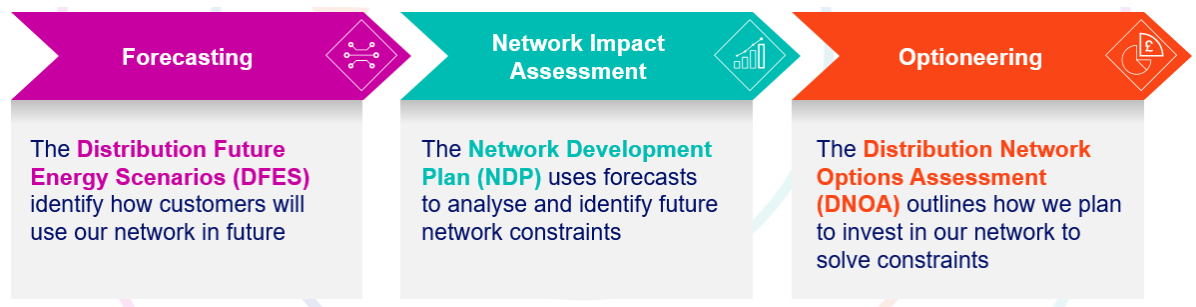
NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers.

In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.

Towards Net Zero

The Government is committed to achieve net zero by 2050. The shift towards electricity to heat our homes and power our cars is critical to achieving this goal and the National Grid is playing a crucial role in meeting this commitment by increasing capacity to meet the growing demand for electricity.

Our network investment planning process is the strategic approach we are taking to investing in our network, ensuring that it can meet future demand in the right place, at the right time while ensuring good value for money for customers.



To ensure that we can provide the network you need from us, your projects need to be included in our Distribution Future Energy Scenarios (DFES). We use this information to predict the future requirements on our network and decide when and where to invest in the network. This ensures that our strategic network planning provides sufficient network capacity as the country transitions to net zero.

We ask Local Authorities about their future plans, including information in your Local Plan annually (normally in May - July). This will inform our future forecasts down to Electricity Supply Area level ensuring we can connect new developments in 5 years and beyond.

NGED strongly recommends that local planning authorities feed into the DFES process on an annual basis, to ensure they have your most current growth plans and ambitions. NGED can tell you when your LPA last submitted data to DFES, by emailing nged.energyplanning@nationalgrid.co.uk.

The DFES informs planning of the network beyond 3 to 5 years into the future (post 2030). If you have a development that needs a connection sooner, please contact NGED as soon as possible to have a discussion with them about securing a connection. A 'connections surgery' can be arranged to discuss any developments you would like to connect, by emailing nged.newsupplies@nationalgrid.co.uk. NGED cannot guarantee capacity until a formal connection offer has been requested, issued and accepted.

132kV Overhead Lines

Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without significant concern. However, where land allocations affect lines supported by steel lattice towers, particularly 132kV, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm:

- a) whether the lines can be accommodated within the development site; or
- b) the viability and feasibility of diverting and/or undergrounding overhead lines.

This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within the allocation policy.

In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding, the need for additional new infrastructure and its visual impact, including larger terminal towers at either end of an undergrounded line, and the potential impact on timescales for delivery of the development.

LPAs should also be aware that where high voltage electricity lines are undergrounded National Grid is unable to support any development which could affect the operation of or obstruct the line, including buildings, tree planting, public highway or attenuation features. A 10m wide corridor of open ground is required above the undergrounded cables. Accordingly, the retention of overhead lines in situ provides greater opportunities to deliver an efficient and effective masterplan, with the potential to deliver a range of uses beneath the lines including green infrastructure, public highway, drainage features and some biodiversity net gain measures.

NGED cannot be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation site's development capacity, where the LPA and/or developer/landowner has not agreed proposals with NGED prior to the adoption of the Local Plan.

Planning for reinforcement

Reinforcement planning is crucial for future growth. As NGED's Network Development Plans identify the need for new substations and other assets to meet future electricity demands, LPAs should collaborate with NGED on suitable locations. Land for these substations should be safeguarded through the Local Plan, with substation delivery timescales factoring into the LPA's housing trajectory.

NGED cannot comment on network capacity for developments beyond five years. To ensure future capacity, LPAs must engage in the Distributed Future Energy Scenarios (DFES) process and review Network Development Plans to confirm their projected growth is included in NGED's plans.

Summary

NGED does not object to the allocation of land upon which its infrastructure is present, however, in the context of the Government's commitment to reach Net Zero by 2050 and the role which National Grid has to play in delivering significant new infrastructure to meet existing and future energy demands, all reasonable efforts should be made by LPAs and developers to safeguard to retain the existing grid infrastructure and the associated embodied carbon.

In preparing Local Plans, LPAs should take the following steps:

1. Ensure your LPA is responding annually to our Distribution Future Energy Scenario questionnaire that is sent out via Regen.
2. For developments that require a connection to the distribution network within the next 5 years, contact NGED as early as possible to arrange a Connections Surgery. The surgery will help you understand the timescales and costs associated with delivering the planned development. .
3. Where land is allocated, priority should be given to retention of high voltage overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land.
4. Where necessary, early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;

5. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.
6. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines and safeguarding of land to accommodate new sub-stations, where necessary, with the agreement of NGED.

Policy S2: Spatial Strategy – NGED raises no objection to the spatial strategy and the direction of homes, subject to the comments below regarding sites 59 and 95 and the IDP.

Site ID: 59 Newton Manor Lane, Brownsover - Housing Allocation

The proposed allocation is traversed by a 132kV overhead line. Although there are no pylons present on site, the presence of the line should be recognised through the allocation policy and masterplanning required to take its presence into account, with the provision of open space and other non-development uses beneath the line to enable its retention in situ. In the absence of these policy provisions, the policy could be ineffective in the delivery of a sustainable form of housing development which is compatible with the retention of the line.

Site ID: 95 Crouner Fields Farm and Home Farm, Ansty - Employment Allocation

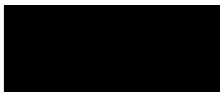
The proposed allocation is traversed by a 132kV overhead line with 2 pylons present on site. The allocation policy should recognise the presence of the overhead line and masterplanning should take account of its presence, to enable retention in situ. In the absence of these policy provisions, the policy could be ineffective in the delivery of a sustainable form of employment development which is compatible with the retention of the line.

Infrastructure Delivery Plan

The Infrastructure Delivery Schedule makes no reference to electricity infrastructure requirements. The LPA should maintain regular contact with NGED, as outlined above to ensure an up to date schedule of requirements.

I trust this is useful in the preparation of the Local Plan. Should Officers have any queries regarding the above, please do not hesitate to contact me.

Yours sincerely,

A black rectangular redaction box covering the signature of Lucy White.

Lucy White B.Sc. (Hons) DipTP MRTPI
Director