

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: 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="Keith"/>	<input type="text"/>
Last Name	<input type="text" value="Thursfield"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="██████████"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
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Post Code	<input type="text" value="██████"/>	<input type="text"/>
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E-mail Address T(where relevant)	<input type="text" value="████████████████████"/>	<input type="text" value="████████████████████"/>

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	S6 and EN7	Policies Map	
Site ID	59				

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.

As a long-time resident of the eastern edge of Strawberry Fields facing the River Avon floodplain, I am extremely concerned that the proposal to build houses to the north of Newton Manor Lane (Site 59) will increase and exacerbate the numerous occurrences of flooding in the area (that I have witnessed over the years) immediately in front of my property and the locality including the northern part of the town, such as in Tesco's car park and the Elliott's Field retail park car park.

Much of what I have to say in support is anecdotal evidence based on nearly 40 yrs of living in this area of observation of increasing local flooding throughout the year, not just in winter. I will submit, along with this form, some photographs I have taken over the years of the flooding outside the front of my property. These show the water close to my property and if it continues to rain when it gets like this, we have an anxious few hours/days wondering how bad the flooding is going to get and how high the water will get this time. I have witnessed people out in rowing boats on the fields in front of my property when the water has been at its deepest and the road to Clifton on Dunsmore becomes impassible as the water floods across the road to a depth too deep for cars to safely pass through it. So things are bad as they are now, and due to climate change, these events are increasing in frequency and severity. Any development that makes this worse would be against National and Local Policy.

Site 59 is on land which slopes down not only from the north to Newton Manor Lane but also to the east to a valley with a stream at its bottom that runs down the eastern part of the site, under Newton Manor Lane and into the nearby River Avon. In past times of flooding, I have witnessed surface water running off the fields onto Newton Manor Lane and flooding the road. Any development can surely only decrease the permeability of the land, so if the proposal increases the impermeable area in the Avon catchment upstream to the north of Newton Manor Lane, the additional run off will find its way via the stream to the river with a resultant increase in the flooding to the point where it may encroach onto and into my property. There are anecdotes of local people struggling to get property insurance cover over the years due to the flood risk here, so even the perception of increased flooding as a result of these proposals could have serious consequences.

The area is already under stress in times of heavy rainfall. I have witnessed flooding in the fields immediately adjacent to Newton Manor Lane on the south side immediately below and opposite the allocation and it does sometimes lead to flooding onto the road where the stream crosses it. There are also numerous instances of burst pipes and drains on Newton Manor Lane at the bottom of the hill running down from Leicester Road around the Newton Manor Lane/Crowthorns junction and around the bend at the bottom beyond the old railway line - the road is always being dug up for yet another water/drainage problem. In times of heavy rainfall, I have also witnessed water pouring off fields onto Newton Manor Lane and water spurting out of manhole and drain covers - it seems clear from this there is a capacity and flooding problem in the vicinity already with the existing developments as they are.

I have concerns that in the supporting document "RUGBY BOROUGH STRATEGIC FLOOD RISK ASSESSMENT (SRFA) SEQUENTIAL AND EXCEPTION TEST REPORT JANUARY 2026" on the bottom of page 6 for site 59 it says firstly, the "sequential test is passed", yet there are other sites in the Borough which were considered and rejected that have no proximity to the flood plain. Surely this can't be correct so how therefore has the sequential test been passed? Especially as in the same paragraph there is a statement that says "Development is dependent on a Flood Risk Assessment" so we don't know then what might happen - yet the site is a preferred allocation?! Surely this cannot be right if the flooding consequences are unknown?

I have seen no specific response from the Lead Local Flood Authority (LLFA) on this matter.

The sequential test requires the allocation of a site with flooding issues only as a last resort where there are no alternatives, but there were several alternatives with less flood risk which were rejected. There also needs to be an exception test passed.

There may have been other factors in other sites being disregarded, but this site originally facilitated the provision of a Secondary School, no longer required, so if that weighed in its favour as opposed to other sites without this benefit surely this site should be reassessed against similar rejected sites that have no implications for the flood plain?

To add further developments upstream in the Avon catchment, as per the current proposals, which would increase the impermeable area causing additional run off which exacerbates the existing flooding would be contrary to National Planning Policy Guidance. NPPF para 170 surely applies:

Planning and flood risk

170. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).

Para **173** also states: Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.

The current Local Plan has **Policy SDC5** the purpose of which is "**to direct new development to areas at the lowest risk of flooding**" para 10.33. This area is clearly not one at a low risk of flooding - quite the opposite as local people well know as we watch the water rise and get nearer to our properties several times a year hoping it will stop before it reaches our homes.

The Emerging Local Plan - contains **Policy EN7** this is aimed at ensuring that new development is steered to the areas with the lowest probability of flooding **AND** to be safe for its lifetime without increasing flood risk elsewhere and, where possible, reduce flood risk overall.

It seems to me, from this and my knowledge and personal observations over 30 odd years of the current flooding issues in the locality, that to allocate a site for housing on a hill side immediately north of Newton Manor Lane higher up in the River Avon catchment that would increase the existing flooding in the locality if there are other areas less prone to flooding where development can be accommodated, is wrong. If this is so, the proposal to build houses and a school north of Newton Manor Lane is **Contrary to National Planning Policy Guidance, and Policies of the Development Plan** - The current Local Plan and Emerging Local Plan as it is proposing development adjacent to an area where there is already a known flooding issue several times a year and it will be likely to worsen this, and it should be accommodated elsewhere as per the sequential test.

(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 the above, but I am seeking the reassessment of sites to be allocated and **the deletion of this site** (no longer with a school "social benefit" attached, which may have been used to justify the exception test) from the adopted Local Plan due to the inherent flooding issues in the locality and the availability of other sites that do not have these flood risk issues.

The replacement of the school now with the provision of open space does not in my opinion provide an environmental benefit to overcome any flood risk related exceptions test – it already is an open space – a field.

Notwithstanding this position, if the site is to remain allocated and be developed, I feel there needs to be some improvement of the junction at St. Thomas Cross. As per my separate form.

(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:

So that I am able to discuss my concerns and evidence and present it in person to the Planning 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.

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>

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I have already submitted a form and photographs on **Flood Risk issues** and stated for that reason that **I object to site 59 being allocated/developed.**

Notwithstanding that position, if the site remains allocated and is developed, I consider **there needs to be highway improvements at the St. Thomas's Cross Junction of Newton Manor Lane, the B4514 and Newton Road.**

I note there is recognition of the increased amount traffic using Newton Manor Lane and there are proposals to put in traffic lights on the western end junction - the A426 Leicester Rd roundabout and provide traffic calming to slow traffic on the Lane. I also see there are proposals to extend a footpath along the Newton Manor Lane frontage of site 59, and I presume the 30 mph limit would be extended this far out. But, once beyond the site, the road will revert to a Country Lane.

However, if, as currently proposed, an additional 285 dwellings are to be built, this will undoubtedly generate additional traffic heading through the Junction at St. Thomas's Cross to the east – which is dangerous now. This is due to its configuration where many users fail to recognise the main road does a 90 degree bend through the junction and priorities remain unclear to some. People from Newton wishing to turn right have to turn dangerously across in front of any cars waiting on Newton Manor Lane, and visibility is restricted by the pub building.

Over nearly 40 years of driving through the junction I have witnessed or been involved in numerous near misses – which go un recorded compared to personal

injury and actual accidents. In particular descending from the A5 cars that want to enter Newton Manor Lane – i.e. go physically straight on, but not turn 90 degrees left on the B5414, may/may not indicate right, as it's often mistaken for indicating turning right onto Newton Road to go towards Newton Village and other vehicles are prone to pull out from Newton Manor lane across the car going straight on. Equally, if no indication is given, assumptions are made that the car will round the 90 degree bend rather than go straight on and cars pull out of Newton Road and turn right in front of the car heading straight on into Newton Manor Lane.

Cars wishing to go into Newton Manor Lane have to give way to oncoming traffic on the B5414 going right around the bend, and this is often seen as a sign by impatient drivers to ignore the give way lines on Newton Manor Lane and Newton Road to "go for it" pulling in front of any stopped vehicles and turning across other traffic – very dangerous.

I would ask that the Inspector views the junction for themselves as it's hard to describe the reality of what happens in words.

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That a Section 106 contribution is made a requirement as part of any allocation of site 59 sufficient to ensure the completion of some sort of improvement scheme at the St. Thomas's Cross junction to change/make priorities clearer and the junction much safer.

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