

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 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*

2. Agent's Details (if
applicable)

**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	Mr	
First Name	Mike	
Last Name	Connell	
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)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Local Plan Paragraph	1.12	Local Plan Policy	Strategy S3 Strategy for employment land	Policies Map	Yes
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Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

No

(2) is Sound

No

(3) complies with the Duty to co-operate

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.

I do not believe the Plan is legally compliant in relation to its consideration of air quality and transport impacts on Shilton.

Rugby Borough Council has statutory duties under Part IV of the Environment Act 1995 to identify, manage and improve air quality. The Council's Air Quality Action Plan 2024–2028 recognises that traffic emissions are a key contributor to poor air quality and that development must not worsen conditions, particularly in locations already experiencing exceedances or vulnerability.

Shilton already experiences the poorest air quality in the borough, largely due to its role as a through-route when the M69 or A5 are congested or closed. The 2024 Air Quality Annual Status Report shows that sensor S2 in Shilton recorded the highest mean pollutant levels of

all 55 sensors across the borough. Despite this, the Local Plan does not adequately assess or mitigate the foreseeable increase in HGV and diverted traffic through Shilton arising from large-scale employment and logistics development at Ansty.

This represents a failure to properly apply the Council's own Air Quality Supplementary Planning Document, which requires proportionate air quality assessment and mitigation where traffic impacts affect sensitive receptors, including existing villages.

I consider the Plan to be unsound for the following reasons.

Not positively prepared

The Plan does not sufficiently account for the cumulative impacts of strategic development at Ansty on surrounding settlements, particularly Shilton. Economic benefits appear to have been prioritised without equal consideration of environmental and public health impacts on neighbouring communities.

Not robustly justified or evidence-led

Transport evidence focuses on junction capacity and strategic roads rather than real-world traffic behaviour. In practice, Shilton functions as an informal diversionary route during incidents or congestion on the M69 or A5. There is insufficient evidence that the Plan has modelled increased HGV movements during motorway disruption, rat-running through rural villages, or the cumulative impact of multiple developments at Ansty over time. Without this, the Plan cannot be considered robustly justified.

Effectiveness

The Plan does not demonstrate how additional HGV traffic will be prevented from routing through Shilton, nor how worsening air quality will be avoided or mitigated. In the absence of enforceable traffic management, routing controls, or village-level mitigation, the policies risk being ineffective in practice.

Consistency with national policy

The National Planning Policy Framework requires planning policies to prevent unacceptable air pollution, protect health and quality of life, and promote sustainable transport. The Plan does not convincingly demonstrate compliance with these principles in relation to rural villages already under environmental stress.

I am also not satisfied that the Duty to Cooperate has been fully met. Traffic and air quality impacts arising from Ansty extend beyond administrative boundaries and directly affect Shilton and neighbouring areas. While strategic cooperation is referenced, there is little evidence of joint modelling of diversionary traffic, engagement focused on rural air quality impacts, or coordinated mitigation for villages outside the immediate development boundary. Given that these impacts are explicitly strategic and cross-boundary in nature, this is a significant omission.

(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.

For the reasons set out above, I consider the Plan to be legally non-compliant and unsound unless modified. I respectfully request that the Plan:

Includes specific assessment of HGV and diversionary traffic impacts on Shilton
Commits to enforceable traffic routing and mitigation measures
Demonstrates how worsening air quality in affected villages will be avoided
Reassesses the scale and phasing of development at Ansty in light of cumulative impacts

Without these changes, the Plan risks causing significant and lasting harm to the health, environment and quality of life of residents in Shilton.

(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)?

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:

The local impact is best expressed by the local that will be impacted. This is not about restricting development, but understanding that there is impact to the surrounding area which can be mitigated which simply isn't present in the plan.

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>

The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>