

## 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="Jeremy"/>	<input type="text"/>
Last Name	<input type="text" value="Foss"/>	<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="[REDACTED]"/>	<input type="text"/>
Line 2	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Line 3	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Telephone Number	<input type="text" value="[REDACTED]"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="[REDACTED]"/>	<input type="text"/>

## 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	1.29	Local Plan Policy	S4	Policies Map	(all)
Site ID	(as appropriate)				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	y	No	
(2) is Sound	Yes		No	N
(3) complies with the Duty to co-operate	Yes	y	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.

n/a

(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.

The proposals S4 are noted.  
 The areas around Shilton, Ansty and Barnacle are already heavily committed to Gypsy and Travellers sites and these bring a range of problems to the local community.  
 Any increase in these areas will exacerbate these issues

(Continue on a separate sheet /expand box if necessary)

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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)

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:

n/a

**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

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Name or Organisation:

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

Local Plan Paragraph	1.31, 1.32, 133	Local Plan Policy	S5	Policies Map	(all)
Site ID	95				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	N
(2) is Sound	Yes		No	N
(3) complies with the Duty to co-operate	Yes		No	N

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.

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The current plan includes Crowner Fields – the Frasers Campus at Ansty. This was consulted under the previous plan which did not include these employment figures (they are only just appearing in this plan). Consequently the legality of the previous consultation must be in doubt, as is the inclusion of the development in this plan.

(Continue on a separate sheet /expand box if necessary)

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The current global political situation is creating the absolute necessity for maintaining arable land for national food security. The Borough Plan makes no mention of "arable land" nor of "food security". This is a major omission.

A lesson from the borough's recent experience: This aspect was shamefully ignored by Rugby Borough Council in the support and acceptance of the Fraser Group campus at Crowner Fields near Ansty. 275 acres of arable land were turned over to retail business in the name (MP Slinger and Cllr Moran) of "economic

development". This development will benefit neither Rugby Borough nor UK in general. The construction and subsequent customer traffic will add to traffic through the local villages which RBC have accepted will require traffic calming, even though the original plans stated no such traffic increase would occur. The loss of green belt to grey belt is probably acceptable for housing, but not for retail outlets. Brown belt sites are available in the borough and should be utilised as a first option.

(Continue on a separate sheet /expand box if necessary)

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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

**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:

Due to the huge impact this development places on the local infrastructure, traffic and ecology of the surrounding area.

**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.

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Name or Organisation:

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

Local Plan Paragraph	5.4, 5.5, 5.6	Local Plan Policy	EN2	Policies Map	(all)
Site ID	95 and (as appropriate)				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	y	No	
(2) is Sound	Yes		No	n
(3) complies with the Duty to co-operate	Yes	y	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.

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The Crowner Fields development completely ignored this, and this must be avoided in future.

(Continue on a separate sheet /expand box if necessary)

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The plan needs more detailed measures to protect the landscape both in character and arable use. .

(Continue on a separate sheet /expand box if necessary)

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Due to the huge impact this development places on the local infrastructure, traffic and ecology of the surrounding area.

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Name or Organisation:

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

Local Plan Paragraph	5.10, 5.11	Local Plan Policy	EN5	Policies Map	(all)
Site ID	(as appropriate)				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input 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.

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EN5 sets out biodiversity protection. The mitigation of biodiversity loss - by passing biodiversity gains to other sites - is not sufficient to protect sites in the borough.

Section 5.10 states that biodiversity net gain should be greater than 10% compared to the pre-development biodiversity value of the site. However, this measurement is only taken once the site has been decimated and prepared for development; not the original site prior to the commencement of development work.

(Continue on a separate sheet /expand box if necessary)

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Biodiversity must be protected within the bounds of the site and not passed on to near-by sites or sites even further afield. The off-site credits are not mandated to be a benefit of the site itself. The plan should build this mandatory gain into each site development.

(Continue on a separate sheet /expand box if necessary)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To monitor the development of environmental policies for this and future strategies.

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Name or Organisation:

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

Local Plan Paragraph	5,29, 5.30, 5.31	Local Plan Policy	EN9	Policies Map	(all)
Site ID	(as appropriate)				

4. Do you consider the Local Plan:

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(2) is Sound	Yes		No	N
(3) complies with the Duty to co-operate	Yes	y	No	

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The air quality in Shilton is already the lowest in the borough. Current developments (i.e. the Crowner Fields development) conspire to increase traffic and resulting pollution in the village. Despite repeated requests the constituency MP has yet to fulfill his promise to provide updated reports on the situation.

With reference to the current Crowner Fields development. The site includes a helipad for executive use. This is not an example of protecting the environment from pollution.

(Continue on a separate sheet /expand box if necessary)

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The plan needs to detail the methods to maintain air quality, its measurement over periods of time, and the mandates to developers in order to maintain (or improve) air quality. The plan needs to detail what factors and causes need to be constantly monitored, and what pollutants are to be included.

