

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	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Ross"/>	<input type="text"/>
Last Name	<input type="text" value="Jennings"/>	<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"/>	<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="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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		Local Plan Policy	Economy E2 Employment development	Policies Map	Yes
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Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

(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.

No. The Local Plan does not appear to comply with the Duty to Co-operate in relation to the proposed allocation of Site 64 for industrial and warehouse use.

The Duty to Co-operate requires meaningful and ongoing engagement with neighbouring authorities and relevant bodies on strategic matters, including transport infrastructure, environmental impacts, and cross-boundary effects. The proposed development at Site 64 would generate a substantial increase in heavy goods vehicle traffic, placing additional pressure on local and strategic road networks that extend beyond the immediate area. However, there is insufficient evidence that neighbouring authorities, highway bodies, and environmental regulators have been adequately engaged to address these impacts in a coordinated way.

In particular, the anticipated rise in HGV movements will significantly affect road capacity, congestion, and safety for surrounding residential communities. These effects are not confined to a single administrative boundary and therefore require robust cooperation with transport authorities and adjacent councils. The documentation accompanying the Local Plan does not clearly demonstrate that such strategic coordination has occurred or that agreed mitigation measures are in place.

Furthermore, the proposal raises clear concerns regarding noise pollution, air quality, and the cumulative environmental impact on nearby residential areas. Industrial and warehouse activity operating at scale is incompatible with the existing character of the surrounding community. Without clear evidence of joint working to assess and mitigate these cross-boundary environmental impacts, the Local Plan cannot be considered to have met the statutory Duty to Co-operate.

The absence of transparent agreements, shared infrastructure planning, and coordinated mitigation strategies strongly suggests that the Duty to Co-operate has not been satisfied in relation to Site 64. As a result, the allocation should not proceed in its current form.

(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.

(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)

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:

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-notices>