

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.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Miss"/> <input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Joanna"/> <input type="text" value="Adam"/>	<input type="text"/>
Last Name	<input type="text" value="Rafe"/> <input type="text" value="Seal"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value=""/> <input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<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=""/> <input type="text" value=""/>	<input type="text"/>

Telephone Number

E-mail Address
(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

Local
Plan
Policy

Policies Map

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

No

(2) is Sound

Yes

No

(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.

I object to the allocation of **Site 64 – Employment Land at Coton Park East** in the **Rugby Borough Council Local Plan** as I consider the allocation to be **unsound**, specifically because it is not **justified, effective, or consistent with national policy**.

As a local resident living on a road closest to the site, I am particularly concerned about the impacts the development would have on the surrounding residential community, infrastructure and environment.

Traffic and Highway Capacity

The Local Plan does not adequately demonstrate that the surrounding road network can safely accommodate the significant increase in traffic that will result from the proposed employment allocation. In particular, there is insufficient evidence regarding:

- Traffic volumes around **M6 Junction 1**, including the predicted increase in traffic generated by the development.
- The condition, capacity and layout of the surrounding road network and local junctions.
- The impact of increased traffic on road safety and congestion for residents, including those travelling to nearby schools and local facilities.

Without robust evidence demonstrating that the highway network can accommodate this level of development safely and efficiently, the allocation cannot be considered justified or effective.

Impact on Residential Area

The proposed allocation is located very close to existing residential areas. The scale and nature of large industrial or warehouse development could result in significant adverse impacts on nearby residents, including:

- Noise pollution from industrial activity and vehicle movements.
- Light pollution from large buildings, yard lighting and 24-hour operations.
- Loss of amenity and enjoyment of the surrounding area.

In addition, there has been insufficient consideration of appropriate operational hours for businesses on the site and how these may affect neighbouring residential properties.

Air Quality and Health Impacts

As a resident who suffers from asthma, I am particularly concerned about the potential impacts of increased traffic and industrial activity on local air quality. Additional HGV traffic and vehicle movements associated with large-scale employment uses could lead to higher levels of pollution in the area, which may have adverse health effects for local residents.

The Local Plan does not sufficiently address these health impacts or demonstrate how air quality will be protected.

Construction Impacts and Structural Concerns

The development of large industrial buildings often requires significant groundworks and heavy infrastructure construction. This may involve piling or other intrusive construction techniques that can cause vibration. Nearby residential properties were not designed with this type of heavy industrial development in such close proximity, and there is concern that construction activity could cause damage to existing homes.

These risks have not been adequately assessed or addressed in the Local Plan evidence.

Loss of Local Green and Recreational Space

The site is currently used informally by residents as an area for walking, exercise and recreation. The Local Plan does not sufficiently demonstrate how these recreational uses will be maintained. It does however state there will be a path for recreation such as cycling and walking.

Conclusion

For the reasons outlined above, the allocation of Site 64 has not been adequately justified and fails to demonstrate that it can be delivered without unacceptable impacts on nearby residents, local infrastructure and the environment. The allocation is therefore considered unsound.

(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.

In order to make the Local Plan sound, the allocation of **Site 64 – Employment Land at Coton Park East** should either be removed from the Rugby Borough Council Local Plan or significantly modified to ensure that development can take place without unacceptable impacts on nearby residents and infrastructure.

If the allocation is retained, it is essential that the mitigation measures already identified through the Local Plan process and agreed by the CPE Committee with Rugby Borough Council are **retained and carried forward into any future planning applications and development proposals**.

In particular, the following provisions have already been recognised as necessary and must remain firmly embedded within the policy and any future development framework:

Retention of buffer zones

The Local Plan already recognises the need for **effective buffer zones between employment development and nearby residential areas**. These buffer zones are critical to protecting residential amenity and must remain in place. They should include substantial landscaping and screening to reduce noise, visual impact and disturbance for nearby residents.

HGV routing via Castle Mound Way

The Local Plan and discussions with the CPE Committee recognise the importance of restricting heavy goods vehicle movements in sensitive areas. In particular, **large warehouse traffic must not pass local schools or residential streets**, and HGV access should be **routed only via Castle Mound Way**. This mitigation is essential for protecting road safety and residential amenity and must remain a firm requirement.

Smaller units closest to residential areas

It has already been recognised that **smaller industrial units should be located closest to residential areas**, with larger warehouse buildings located further away. This approach helps to reduce the scale, noise and visual impact of development on nearby homes and should remain a key requirement in the Local Plan policy.

Design code developed with community input

A **robust design code** should be required prior to development coming forward. This should be prepared in consultation with **local residents, the parish council and the developer**, and should address building scale, height, lighting, landscaping and noise mitigation to ensure the development integrates appropriately with the surrounding area.

Protection of residential amenity

The Local Plan should include stronger safeguards to protect nearby residents, including controls on:

- Noise levels
- External lighting
- Operational hours for businesses close to residential properties

Air quality and health protection

A detailed **air quality assessment and mitigation strategy** should be required before development proceeds, particularly given the likely increase in traffic and its potential impacts on residents, including those with respiratory conditions such as asthma.

Provision for recreation and public access

The development should include **extensive provision for continued public use of the area for walking, exercise and recreation**, including accessible green spaces and walking routes so that residents can continue to enjoy the area. These modifications would help ensure that, if Site 64 is retained in the Local Plan, development would take place in a way that better protects the surrounding community, local infrastructure and residential amenity.

(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:

I would like to participate myself or a member of the Coton Park East Committee as I feel we best represent the feelings of residents through the work we have done so far with the community and in speaking with RBC and local councillors.

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.

I wrote it myself and used CoPilot to format it into paragraphs.

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>