

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="Thomas"/>	<input type="text"/>
Last Name	<input type="text" value="Redhead-Holroyd"/>	<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" 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 representation

Name or Organisation:

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
----------------------	----------------------	-------------------	----------------------	--------------	----------------------

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.

1. Severe Highway Safety Risks Adjacent to Rugby Free Primary School
 The proposed sole vehicular access to the industrial site via Central Park Drive will necessitate all HGV and employee traffic passing directly in front of Rugby Free Primary School (1 Bailey Road, CV23 0PD). This route intersects with the school's main pedestrian entrance and play areas, creating an unacceptable risk to child safety.

- Contravenes NPPF Paragraph 111, which requires developments to ensure safe and suitable access for all users.
- Breaches Rugby Local Plan Policy D2 (Access and Highway Safety).

2. Inadequate Assessment of Cumulative Traffic Impact
 The Transport Assessment fails to address cumulative impacts from existing and committed developments in the Coton Park area.

- Contrary to Policy TR1 (Transport) and Policy HS5 (Health and Wellbeing) of the Local Plan.

- Absence of a robust Travel Plan and mitigation strategy renders the application deficient under Regulation 122 of the Community Infrastructure Levy Regulations 2010.

3. Conflict with Child Welfare and Public Health Objectives

The proximity of an industrial estate to a primary school raises serious concerns regarding air quality, noise, and visual intrusion.

- Increased HGV traffic will elevate NO₂ and particulate emissions, undermining compliance with Air Quality Management Area objectives and NPPF Paragraph 185 on avoiding significant adverse impacts on health.
- Disregards Policy SDC9 (Health Impact Assessments).

4. Non-Conformity with Local Development Plan and SPD

The Cotton Park East Supplementary Planning Document envisages a balanced mix of uses with appropriate buffers and green infrastructure. The current proposal for large-scale industrial logistics fails to provide adequate separation from sensitive receptors such as schools and residential areas.

- Represents a material departure from the adopted spatial strategy and should be refused under Section 38(6) of the Planning and Compulsory Purchase Act 2004.

(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)?

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:

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>