

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="C/O Agent"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="C/O Agent"/>	<input type="text" value="Gareth"/>
Last Name	<input type="text" value="C/O Agent"/>	<input type="text" value="Hooper"/>
Job Title (where relevant)	<input type="text" value="C/O Agent"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Brandon Estates Ltd"/>	<input type="text" value="DPP"/>
Address Line 1	<input type="text" value="The Old School House"/>	<input type="text" value="11-13 Penhill Rd"/>
Line 2	<input type="text" value="Forshaw Heath Lane"/>	<input type="text" value="Pontcanna"/>
Line 3	<input type="text" value="Solihull"/>	<input type="text" value="Cardiff"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="B94 5LH"/>	<input type="text" value="CF11 9PQ"/>
Telephone Number	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
E-mail Address (where relevant)	<input type="text" value="C/O Agent"/>	<input type="text" value="Gareth.Hooper@dppukltd.com"/>

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: DPP on behalf of Brandon Estates Limited

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

Local Plan Paragraph		Local Plan Policy	Draft Policy S2; Draft Policy S6; Draft Policy W1	Policies Map	N/A
Site ID	34 (HELAA)				

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 checked="" 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.

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.

Please refer to attached Cover Letter.

(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.

Please refer to attached Cover Letter.

(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:

To have the opportunity to present the case set out in our representations to the Inspector which relate to the technical evidence base the Council has produced and the test of soundness within the NPPF in relation to the draft planning policies contained within the draft Plan.

It is considered due to the technical nature of the issues raised; it would be a benefit to the examination process to participate in the hearing session discussions on these elements to elaborate on the issues raised.

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

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.

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

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

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Development Strategy Team
Rugby Borough Council
Town Hall,
Evreux Way,
Rugby,
CV21 2RR

Ref: 6320CA.L005

Date: 13 March 2026

Dear Sir/Madam,

Regulation 19 Draft Rugby Local Plan January 2026 – Representations on behalf of Brandon Estates

Introduction

DPP Planning is instructed by Brandon Estates Limited to make representations on the Regulation 19 Draft Rugby Local Plan which was published by Rugby Borough Council in January 2026.

Brandon Estates Ltd are the freeholder of the former Coventry Stadium site (also known as Brandon Stadium) which was considered in the Housing and Economic Land Availability Assessment (HELAA) undertaken in March 2025 (Site Reference 34 refers).

This letter addresses the proposed policies and supporting evidence of the Regulation 19 Draft Local Plan that has been prepared by Rugby Borough Council against the soundness tests required for Local Plan formulation. These representations assess the Regulation 19 Draft Local Plan in accordance with legal and procedural requirements and consider whether it is 'sound' (paragraph 36 of the National Planning Policy Framework ('NPPF') December 2024).

Policy Context

The Regulation 19 Draft Local Plan is the second iteration of the Plan addressing the comments provided under subsequent consultation in relation to the previous regulation 18 draft plan. The Regulation 19 Plan should represent a full draft plan which the LPA considers to be sound in preparation for submission of the plan for examination.

Paragraph 36 of the NPPF states that plans are sound if they are:

- a) *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

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- c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by a statement of common ground; and*
- d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, where relevant.*

In addition to the soundness tests outlined in the NPPF, the Rugby Borough Council area includes the Birmingham Green Belt Designation. In relation to the plan-making process, the NPPF notes under paragraph 145 *“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”*

Prior to concluding exceptional circumstances apply to warrant green belt release through strategic policies, Local Planning Authorities (LPAs) should demonstrate that all other reasonable options have been examined for meeting the identified need which takes account of the following:

- a) *makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) *optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) *has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. (NPPF, para. 147, 2024)*

Paragraph 148 of NPPF notes that *“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”*

At this stage in the plan-making process it is considered appropriate to also have regard to NPPF paragraph 24 which notes *“Effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and climate resilience.”* The NPPF goes on to state that *“Effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and climate resilience.”*

Housing Requirement and Land Supply

The LPA published a Development Needs Topic Paper in March 2025 which summarised the identified need for future development in the council area. In terms of housing need, the Paper concluded that Rugby Council had a need for 12,978 new homes between 2024 to 2045 based on 618 homes per annum. The housing requirement allowed for a 9% buffer, resulting in a requirement of 14,134 homes over the plan period. The buffer is proposed to increase the likelihood of consistently being able to demonstrate a 5-year housing land supply over the plan duration.

Whilst Regulation 18 plan period was for 21 years, the Regulation 19 plan period has been reduced by 3 years to 2042. As such, the expected adoption date of spring 2027 would result in a 15-year plan period rather than the original 21-year plan period consulted on under the Regulation 18 Plan.

However, reflecting the housing requirement calculation date, the Regulation 19 Plan base date is set to 2025, resulting in a 17-year plan period. The reduced plan period reflects differing views from consultees on the Regulation 18 consultation.

Based on the revised plan period the Council have reviewed the housing need, and the requirement has been updated. Using the standard method results in 636 new homes per year equating to 10,812 homes over the plan period. An 8.5% buffer has been applied to the need, giving a housing requirement for the draft Plan of 11,729 homes

By shortening the length of the plan period, fewer homes are now planned than when the LPA consulted on the Regulation 18 plan in Spring 2025. Whilst it is within the LPA's scope to define the plan period, doing so goes against the essence of the NPPF which seeks to anticipate and respond to long-term requirements and opportunities.

In respect of the 'buffer', the current adopted Local Plan had a buffer of 17.5% and the regulation 18 plan had a 9% buffer. As such, the Regulation 19 Plan's 8.5% buffer is a further reduction on the likelihood of consistently being able to demonstrate a 5-year housing land supply over the plan duration.

The Council cannot currently demonstrate a 5-year housing land supply, raising concerns about the deliverability of allocations being carried over from the current adopted plan. In addition, whilst the housing need is lower for the plan period, this is due to the reduction in length of the period and not the actual year on year need for homes which has risen since the Regulation 18 plan. As such, it would be more appropriate to increase not decrease the buffer. Consequently, we consider the proposed buffer is not sufficient to ensure the Council will be able to maintain a 5-year housing land supply throughout the plan period. Based on the increase in per annum housing need, it is recommended the buffer applied is between 10% to 15% to ensure the plan can maintain an appropriate land supply over the plan period.

Draft Policy S2: Strategy for Homes

Draft Policy S2 sets out that to meet future housing needs 10,812 new homes will be delivered in the period 2025-2042 (636 per annum).

Brandon Estates object to the principle of the overall housing strategy as drafted in Policy S2. The draft policy is considered unsound as it is in direct contradiction of national planning policy, as it prioritises Green Belt release over the use of previously developed land. The Regulation 19 plan identifies several allocations which require Green Belt Release while at the same time overlooking sites on previously developed land and 'grey-belt' land.

Where it is necessary to release Green Belt land, the NPPF directs LPAs to prioritise land for development that is identified as previously developed land, then consider grey belt land, which is not previously developed, and then other Green Belt locations having considerations to areas which can demonstrate they are sustainable locations.

Current national policy on Green Belt is set out in the National Planning Policy Framework 2024. On Green Belt changes, paragraph 145 states:

"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period."

Paragraph 145 goes on to state that:

"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations".

The Green Belt Exceptional Circumstances Topic Paper was published in December 2025 provides an assessment of the exceptional circumstances which apply to those allocations which require green belt release. However, the Council have not fully considered all other reasonable options as required by NPPF paragraph 146 which notes:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for

meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

As an example, the Site known as Coventry Stadium (HELAA Site Reference 34) would represent a site which, in accordance with the priority order set out in the NPPF, should be considered ahead of a number of the sites included in the draft plan. In considering the appeal against refusal of planning permission (Appeal Ref: APP/E3715/W/23/3322013), the Inspector confirmed that the site represented previously developed land and its redevelopment would not result in any encroachment into the countryside. The Inspector went further stating:

“The Green Belt in this location does not have a role in preserving the setting and special character of historic towns so that the appeal proposal would not conflict with this Green Belt purpose. Finally, the appeal scheme would involve the regeneration of a brownfield site and would contribute positively towards the purpose of assisting regeneration and assisting the recycling of derelict and other urban land in the West Midlands. In summary, the appeal scheme would therefore not offend any of the Green Belt purposes.”

The Inspector went on to conclude that:

“the proposed development would not form inappropriate development in the Green Belt, would not have a greater impact on openness than the existing development on the site and would not conflict with any of the Green Belt purposes. Accordingly, the proposal complies with section 13 of the Framework which seeks to protect the Green Belt.”

It is clear, therefore, that following the ‘cascade’ of priorities for the location of residential development, the Site known as Coventry Stadium (HELAA Site Reference 34) should be considered ahead of a number of those sites which have been allocated in the draft Local Plan which are located within the Green Belt under paragraph 146 (a) as it represents a brownfield site which is underutilised.

The draft local plan discounted the site as unsuitable concluding it is a “unsuitable location remote from settlement and loss of sports provision”. However, this contradicts the wording of the Council’s recent sustainability appraisal which notes that housing could be feasibly considered on part of the site.

Further to this, the Regulation 19 plan has allocated a new site for residential development at Binley Woods ‘Site 54 Oakdale Nursery’. This site is in very close proximity to Coventry Stadium, yet the Stage 2 Site Selection finds Oakdale Nursery to have a ‘relatively high connectivity’ score, with proximity to key amenities and presence of previously developed land on site. Given its location and characteristics, Coventry Stadium should also score similarly in these areas and it being discounted suggests an inconsistent application of methodology. The sustainable location considerations of the ‘Oakdale Nursery’ Site are further considered in the recent application approved subject to a s.106 agreement under application reference R24/0716 at the 11th February 2026 Planning Committee which found the Site was sustainably located. These same considerations are considered relevant for the Coventry Stadium Site which is within a similar location along the eastern boundary of Binley Woods as the Oakdale Nursery Site.

Furthermore, the Council’s Green Belt Strategic Assessment (October 2025) identifies the Site as potential grey belt land noting it would not contribute to the Green Belt Purposes (a) to check the unrestricted sprawl of large built-up areas, (b) to prevent neighbouring towns merging into one another and (d) to preserve the setting and special character of historic towns.

It is clear from the example of Coventry Stadium that the Council have progressed a strategy which priorities greenfield green belt release over previously developed land and grey belt land and have inconsistently applied the methodology

of assessing sites. Such an approach is inconsistent with NPPF paragraphs 145 to 147 and, therefore, Policy S2 cannot demonstrate it meets soundness test (a) positively prepared, (c) effective and (d) consistent.

Draft Policy S6: Residential Allocations

Following our representations on Draft Policy S2 above, we object to draft Policy S6 on the basis that it is unsound.

As set out above, the Regulation 19 Plan does not sufficiently evidence the justification for the release of Green Belt land for housing above preferable brownfield and 'Grey-Belt' sites.

Draft Policy S6 sets out proposed residential allocations to meet the identified need, many of which are located within the Green Belt on previously undeveloped sites. The development site allocations annex provides more detailed development principles. New homes are focused on Rugby, which, including existing commitments, will accommodate at least 75% of new housing 2025-2042.

Within the green belt, new homes are planned at the main rural settlements, with the largest number of new homes planned at Long Lawford via two allocations (400) both of which are greenfield sites which would require release from the Green Belt. A total 11 draft allocations are proposed, with only two draft allocations relating to previously developed land, the remaining 9 sites are all undeveloped sites in the Green Belt.

Although the number of allocations within the green belt has been reduced under the Regulation 19 plan, a new allocation adjoining Binley Woods is proposed for 43 dwellings referred to as Oakdale Nursery, Binley Woods. This draft allocation is directly opposite Coventry Stadium. The Site Assessment Topic Paper (2025) concludes there are medium to low landscape constraints with the site, and it has a relatively high connectivity score and access via non-car modes to services in Binley Woods such as the primary school. It is located alongside existing residential development and is partially previously developed land. The Council's failure to apply the same credentials to the Coventry Stadium site demonstrates an inconsistency in approach.

The Council are required to demonstrate that they are confident they have examined fully all other reasonable options for meeting its identified need for development prior to releasing any Green Belt land. This through reusing brownfield land, underutilised sites such as so-called 'Grey-Belt' land, uplifting densities within urban areas, and underused land in any other locations well served by public transport, in line with Paragraph 147 of the NPPF.

While the above sites are allocated for residential development in the existing Green Belt, other sites have been discounted which constitute previously developed land, which following the cascade are preferable for development. One such site is our client's site, at the former Coventry Stadium, which was found at appeal (Ref: APP/E3715/W/23/3322013) to be considered previously developed land, the redevelopment of which would not offend any of the five Green Belt purposes, in line with Section 13 of the NPPF. Therefore, the former Coventry stadium site should be given appropriate weight in its consideration for housing and be considered further for allocation.

The Council's Sustainability Appraisal sets out at Paragraph 5.4.27 that an element of facilitating housing at the former stadium site (Site 34) 'could feasibly be explored'. The draft Plan does not take account of this suggestion in its own evidence base under Green Belt Exceptional Circumstances Topic Paper.

The Council's HEELA sets out that the stadium site was discounted due to being an unsustainable location remote from settlement. However, the Inclusion of Site 54 Oakdale Nursery, which is in very close proximity to Coventry Stadium and shares similar characteristics demonstrates an inconsistent application of the site assessment methodology. The assessment finds one site sustainably located and the other not.

This inconsistent application of methodology indicates that Policy S6 cannot demonstrate it meets soundness test (b) justified and (d) consistent.

Draft Policy W1: Protection of Community Facilities

Draft Policy W1 relates to the Protection of Community Facilities. It specifically refers to the Council's support for the 'restoration of Coventry Stadium' for "speedway and stock car racing and other motor sports together with other community uses". It goes on to state that "Planning permission will not be granted for development proposals which could conflict with these objectives".

Representations on behalf of the applicant were made on this draft policy at the Regulation 18 stage, highlighting that it wrongly seeks to apply national policy tests relating to sports facilities to community facilities. Furthermore, it was argued that by seeking to treat "Coventry Stadium" differently to other 'community facilities', it is not compliant with national requirements to adopt a criteria-based policy for the loss of such facilities. The Local Plan Consultation Statement (December 2025) upholds its original draft policy position, and the wording has remained the same under the Regulation 19 draft Local Plan.

We object to Policy W1 on the basis that the policy is unsound and inconsistent with national policy. Policy W1 explicitly refers to Coventry Stadium as being treated in a different way to other facilities but fails to set out why this is the case. Brandon Estates contend that Coventry Stadium has never acted as 'community facility' which by definition "*seeks to enhance the sustainability of communities and residential environments*".

Brandon Estates conclude, therefore, that Draft Policy W1 should be amended to reflect Paragraph 98 of the NPPF not Paragraph 104. Policy W2, which relates to Open Space and Sports Provision, is the correct policy against which the requirements of NPPF Paragraph 104 should be applied. At present, Draft Policies W1 and W2 read as interchangeable, which is inconsistent with national guidance.

In addition to the failure to reflect the correct element of national guidance, Part B of the draft policy establishes separate criteria for the consideration of the development potential of the former Coventry Stadium, outlining that planning permission will not be granted for any development proposal which does not support the restoration of the stadium for speedway and stock car racing. The NPPF does not allow for a specific facility to be treated outside of the criteria based policies. A preference for retention can be stated, but a failure to include criteria against which this will be considered is contrary to national guidance. Indeed, this approach is accepted by draft Policy W2 which states that: "*National policy on the protection of existing open space, sports and recreational buildings and land, including playing fields, will be applied.*".

The draft Local Plan fails to justify the identification of Coventry Stadium as a 'community facility' which cannot be redeveloped. As such, Policy W1 must include criteria for the redevelopment of Coventry Stadium.

Whilst the Council identify Coventry Stadium as a community facility in planning policy terms, in May 2016 the site was put forward as an asset of community value but rejected. Whilst it is acknowledged that assets of community value relate to a different legislative framework than the Town and Country Planning Act, it nonetheless provides a helpful indication of the 'value' such facilities provide to the community in which they are located. The site has lain derelict since 2016, meaning it cannot be said that the former stadium is a 'valued' facility, the loss of which has meant that the community has not been able to "meet its day-to-day needs". Brandon Estates conclude that Coventry Stadium cannot be defined as a community facility for the purposes of Policy W1.

In addition, the Plan needs to recognise that the Council's Local Plan Sustainability Appraisal which underpins the draft sets out at Paragraph 5.4.27 that an element of facilitating housing at the site 'could feasibly be explored'. The national requirement for a plan to be positively prepared means that Policy W1 should include the possibility that the site could come forward in a number of ways, meeting several policy objectives.

As drafted, the singling out of the former Coventry Stadium as set out in Policy W1 is inflexible and is not based on robust and credible evidence on the operation of the stadium site. Moreover, as currently drafted, the reference to the former Coventry Stadium would prevent positive planning to meet the objectively assessed housing needs of the Borough. Therefore, Part B of Policy W1 should be removed, and that the site treated equally, in alignment with national policy.

Conclusion

Following a review of the consultation material supporting the Regulation 19 Draft Local Plan, it is considered the Plan is unsound and cannot demonstrate it has been positively prepared, justified, effective or consistent with national policy. In particular, the inclusion of Policy W1 as drafted represents a clear divergence from NPPF due to the exclusion of any exception approach as detailed in paragraph 104 of the NPPF for these types of existing facilities. The approach taken under Policy W1 is not supported by any evidence which would warrant an inconsistency with national policy.

It is strongly recommended the Council seek to include the following amendments as part of the examination submission:

- Extend the Plan Period to 20 years and increase the housing requirement accordingly to ensure the Plan provides long term delivery of housing.
- Increase the housing requirement buffer to between 10% to 15% to ensure the Plan reflects the higher per annum need and can maintain a 5-year housing land supply.
- Amend Policy S2 to reflect the above changes to ensure the policy is robust.
- Amend Policy S6 to replace green belt exception sites with preferable sites in accordance with paragraph 146 of NPPF.
- Reconsider Site 34 within the HELAA based on the Site being underutilised, brownfield Site and based on the findings of the SA. The consideration of the site should also be re-assessed to take account of the similarities with Site 54, which would see it considered appropriate for development.
- Given the above amendments, Coventry Stadium should be considered for allocation to help meet the housing requirement in line with NPPF paragraph 146 in relation to Green Belt release.
- Amend Policy W1 to reflect paragraph 104 of NPPF and the potential for the Coventry Stadium to accommodate an element of housing.

The proposed changes to the Regulation 19 Plan detailed in this representation and summarised above would ensure that the Plan is sound in accordance with Paragraph 36 of the NPPF being (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy.

We welcome any opportunity to participate in any further hearing sessions or public consultations as part of the plan making process within Rugby Borough.

We would be grateful if you could confirm receipt of these representations.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Gareth Hooper', with a long horizontal line extending to the right.

Gareth Hooper
CEO
DPP Planning

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