

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	Mr	
First Name	Alan	
Last Name	Kan	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
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: Alan Kan

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

Paragraph	Policy W1(B) and supporting text 7.1-7.6 referring to Coventry Stadium, Brandon.	Policy	W1 – Protection of Community Facilities	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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.

Policy W1(B) explicitly supports the restoration of Coventry Stadium, Brandon for speedway and stock car racing. This policy approach appears **inconsistent** with national planning policy, environmental legislation, and the evidence-based plan making required for Local Plans.

Lack of evidence and justification

The policy safeguards a specific land use without presenting proportionate or up-to-date supporting evidence. The National Planning Policy Framework requires Local Plans to be justified by appropriate and proportionate evidence. There is no clear demonstration that motorsport use remains the most appropriate use of the site when considered against environmental constraints, community health considerations, and alternative uses.

Biodiversity and Environment Act requirements

Since motorsport activities ceased, the site has had an extended period of limited disturbance which may have allowed habitats and wildlife to establish. The Environment Act 2021 requires planning authorities to secure biodiversity net gain and contribute to nature recovery. Supporting the reintroduction of high-impact motorsport activity without comprehensive ecological assessment risks conflicting with these statutory duties.

The National Planning Policy Framework also requires planning policies to protect and enhance biodiversity, minimise impacts on habitats, and support ecological networks. The Local Plan policy does not demonstrate how these duties would be met.

Noise and health impacts

Speedway and stock car racing generate significant noise levels, engine emissions, lighting impacts and event traffic. The Noise Policy Statement for England requires planning authorities to avoid significant adverse impacts on health and quality of life. Policy W1(B) appears to support a high-noise activity without requiring evidence that these impacts can be avoided or adequately mitigated. In addition, repeated high-intensity noise events can affect both local residents and wildlife behaviour. The policy does not provide safeguards or require detailed assessment of these impacts before supporting the use.

Climate and sustainability considerations

The planning system is required to support the transition to a low-carbon future and minimise pollution. Motorsport activities involve fossil fuel engines, increased traffic generation and associated emissions. The policy does not demonstrate how supporting this use aligns with climate objectives or local environmental priorities.

Failure to consider reasonable alternatives

Local Plans should be positively prepared and consider reasonable alternative uses of land. The site could potentially deliver biodiversity enhancement, accessible green space, community recreation facilities or other lower-impact uses that better support health and environmental objectives. By explicitly prioritising motorsport restoration, the policy may unnecessarily constrain these alternatives without proper assessment.

Policy bias and unusual wording

The wording within Policy W1(B) is unusual in the context of strategic planning policy. The statement that the Council “supports the restoration” of a specific activity appears to go beyond the normal function of a Local Plan policy, which is typically to establish criteria against which proposals are assessed rather than to advocate for a particular private development outcome.

This wording risks creating the perception of policy bias and may prejudice the proper and objective consideration of future planning applications relating to the site. In doing so, it may undermine confidence that proposals will be assessed fairly against environmental, planning and public interest considerations.

For these reasons the policy cannot be considered justified, effective or consistent with national planning policy and therefore fails the tests of soundness.

For these reasons the policy is not justified, not effective, and not consistent with national planning policy, and therefore fails the tests of soundness.

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.

Policy W1(B) should be amended to remove the prescriptive support for motorsport restoration.

Suggested modification:

Delete the wording:

“The council supports the restoration of Coventry Stadium, Brandon for speedway and stock car racing and other motor sports together with other community uses.”

Replace with:

“The future use of the Coventry Stadium, Brandon site will be determined through the planning application process having regard to environmental constraints, biodiversity considerations, residential amenity, transport impacts and the health and wellbeing of surrounding communities.”

In addition, any proposal involving motorsport or other potentially high-impact activities should be required to demonstrate, through independent evidence:

- Ecological survey and habitat assessment
- Biodiversity Net Gain compliance
- Noise Impact Assessment in accordance with the Noise Policy Statement for England
- Air quality and public health impact assessment
- Transport and environmental impact assessment
- Meaningful community consultation on alternative uses of the site

These modifications would ensure that the Local Plan remains policy-led, evidence-based and consistent with national planning policy.

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

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:

Participation in the hearing sessions would be important in order to ensure that the views and lived experience of local residents are properly considered as part of the examination process. Residents living in proximity to the site are uniquely placed to provide evidence regarding the environmental character of the area, existing wildlife presence, background noise conditions and the potential impacts that the reintroduction of motorsport activities could have on residential amenity, health and wellbeing. The wording of Policy W1(B) gives explicit support to a particular land use. It is therefore important that the Inspector hears directly from members of the local community who may be affected by that policy and by any future planning proposals arising from it. Local input can assist in assessing whether the policy has been prepared on the basis of robust and balanced evidence. Participation would also help ensure that the examination fully considers whether the policy appropriately reflects local environmental conditions, biodiversity interests and community priorities, rather than relying solely on strategic or promotional representations. For these reasons it is considered both reasonable and necessary for LOCAL residents to have the opportunity to contribute to the hearing sessions.

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.

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>