

Imogen Lewis

From: Duncan Chadwick <[REDACTED]>
Sent: 19 February 2026 11:26
To: Local Plan
Cc: [REDACTED]
Subject: Proposed Submission Consultation - Rugby Borough Local Plan 2042
Attachments: CTPL- Rugby Local Plan Proposed Submission Reg19 Consulation - Rooney's - The Bryants Brandon Lane - Final Submission incl Appendix - 19-02-26.pdf; Representation_Form_January 2026_v2 (1) Bryants Brandon Lane - CTPL - 18-02-26.pdf

Importance: High

Dear Local Plan Team

We write on behalf of our clients, Mr Felix Rooney and his son Mr Patrick Rooney, who owns the site proposed to be allocated for 10 no. additional pitches for gypsies and travellers at The Bryants, Brandon Lane, Ryton-on-Dunsmore, Coventry, CV3 3GW which is included within Policy S4 "Sites for Gypsies and Travellers" of the *Rugby Borough Local Plan 2025-2042 Proposed Submission Version January 2026*. This is shown on the Plan's Policies Map.

We attach our clients' representations on the Proposed Submission Local Plan. Overall, our clients are very supportive of the proposed allocation of the site at The Bryants, Brandon Lane, Ryton-on-Dunsmore for 10 no. additional pitches for gypsies and travellers and Policy S4 "Sites for Gypsies and Travellers" of the Proposed Submission Local Plan. Nothing in this representation should be construed as anything other than support for this part of the Proposed Submission Local Plan.

Our only concerns are about whether the Plan has been positively prepared because of the risk that the Local Plan's strategy for meeting the need for gypsy and traveller pitches in the Borough may not meet the area's objectively assessed needs for such provision, especially in the second half of the Plan period, as highlighted in the Plan's *Sustainability Appraisal*. There is a potential "lost" opportunity by not exploring the realistic option of providing more pitches (over and above the additional 10 pitches provided for as part of Policy S4) at The Bryants, an established existing site in an area where other possible options are limited. This would help meet existing need, assist with the "soundness" tests of the Proposed Submission Local Plan and also provide some flexibility and robustness in the Local Plan, especially in the second part of the Plan period after 2035. We trust that this representation by our clients is of assistance to the Council and Inspectors tasked in the future with the examination of the Proposed Submission Local Plan. However, should you require any further information please let me know.

We include alongside this representation a copy of a *Local Plan Publication Stage Representation Form*.

We would be grateful if you could acknowledge safe receipt of the representation and accompanying form.

Regards

Duncan

Duncan Chadwick BSc MSc MRTPI

Managing Director



www.chadwicktowntplanning.co.uk

Chadwick Town Planning Limited

Registered Office: 7 Rectory Road, Hook Norton, Banbury, Oxfordshire, OX15 5QQ

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VAT Registration No. 371 4873 78

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*

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="Messrs"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="John & Patrick"/>	<input type="text" value="Duncan"/>
Last Name	<input type="text" value="Rooney"/>	<input type="text" value="Chadwick"/>
Job Title (where relevant)	<input type="text" value="N/A"/>	<input type="text" value="Managing Director"/>
Organisation (where relevant)	<input type="text" value="N/A"/>	<input type="text" value="Chadwick Town Planning Ltd"/>
Address Line 1	<input type="text"/>	<input type="text" value="7 Rectory Road"/>
Line 2	<input type="text"/>	<input type="text" value="Hook Norton"/>
Line 3	<input type="text"/>	<input type="text" value="Banbury"/>
Line 4	<input type="text"/>	<input type="text" value="Oxfordshire"/>
Post Code	<input type="text"/>	<input type="text" value="OX15 5QQ"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text"/>	<input type="text" value="REDACTED"/>

(where relevant)

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

Name or Organisation: Chadwick Town Planning Limited

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

Paragraph	<input type="text" value="1.29"/>	Policy	<input type="text" value="S4"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text" value="X - see reps"/>	No	<input type="text" value="X - see reps"/>
(3) complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

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.

We have some concerns that in respect of being positively prepared there is a risk that the Local Plan's strategy for meeting the need for gypsy and traveller pitches in the Borough may not meet the area's objectively assessed needs for such provision, especially in the second half of the Plan period.

See attached CTPL representation.

(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.

Whilst the allocation of our clients' site at The Bryants for 10 additional pitches, is in line with the GTAA's recommendation for intensifying and expanding existing sites to help meet five-year and longer-term need, which is supported by the Plan's *Sustainability Appraisal*, there is a potential "lost" opportunity by not exploring the realistic option of providing more pitches at The Bryants, an established existing site in an area where other possible options are limited.

This (i.e. provision of more pitches at The Bryants) would help meet existing need, assist with the "soundness" tests of the Proposed Submission Local Plan and also provide some flexibility and robustness in the Local Plan for any additional need that may arise over the Plan period, for instance from a higher number of households moving into Rugby Borough than anticipated, whilst delivering sustainable development.

See attached CTPL representation.

(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 represent our clients and the landowner in respect of provision at Bryants Bungalow, Brandon Lane, which is a key part of future additional provision that is vital for meeting the need for pitches for gypsies and travellers in line with Policy S4 of the Plan and as highlighted in the GTAA, 2025 and Sustainability Appraisal.

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>



Chadwick Town Planning

Rugby Borough Local Plan 2025-2042
Proposed Submission Consultation
Development Strategy Team
Town Hall
Evreux Way
Rugby
CV21 2RR

By Email Only - localplan@rugby.gov.uk

Our Ref: RO0002/dc

24th February 2026

Dear Sir/Madam

Rugby Borough Local Plan 2025-2042 Proposed Submission Version January 2026 - Consultation on the Proposed Submission Local Plan (Regulation 19) – January to March 2026

We write on behalf of our clients, Mr John Rooney and Mr Patrick Rooney, who owns the site (Title No. WK415435) proposed to be allocated for 10 no. additional pitches for gypsies and travellers at The Bryants, Brandon Lane, Ryton-on-Dunsmore, Coventry, CV3 3GW which is included within Policy S4 "Sites for Gypsies and Travellers" of the *Rugby Borough Local Plan 2025-2042 Proposed Submission Version January 2026* ('Proposed Submission Local Plan'). This is shown on the Plan's Policies Map and is reproduced below at Figure 1.

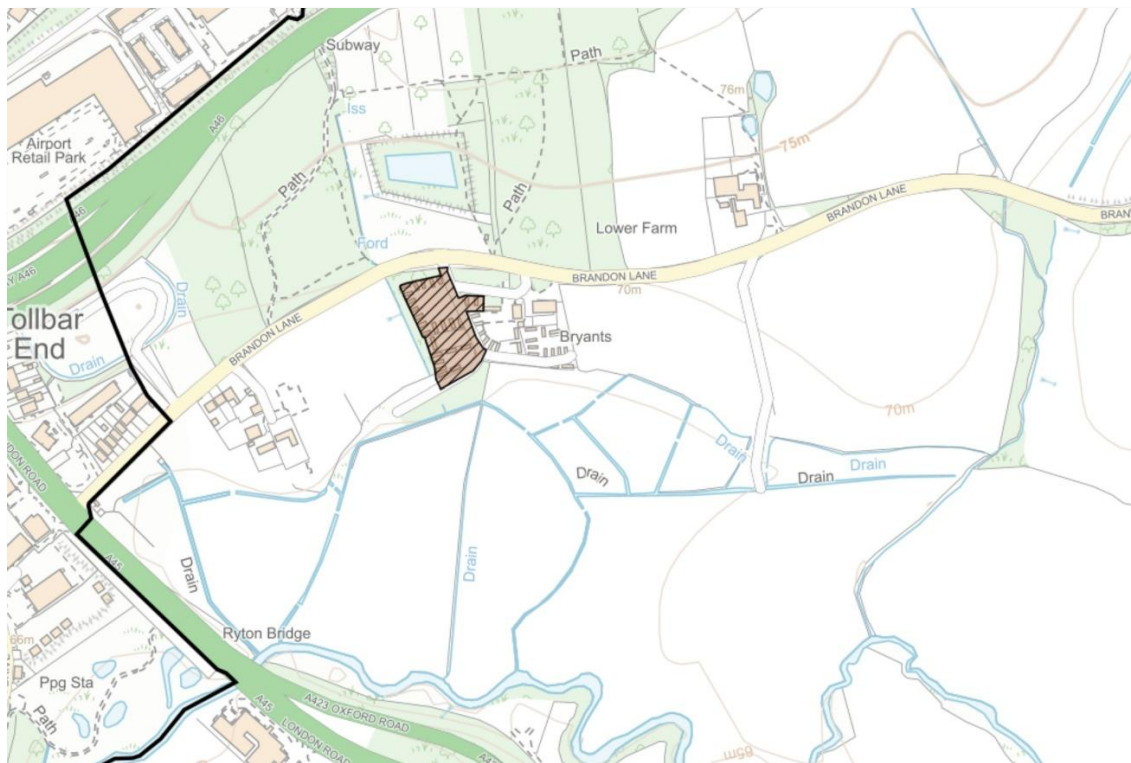


Figure 1 – Proposed Allocation at The Bryants – Policy S4

Chadwick Town Planning Limited

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Background

The proposed site allocation is part of an existing, well-run, established, gypsy and traveller site known as The Bryants or Bryants Bungalow which has a large number of approved permanent pitches. See Figure 2 below taken from Google Earth in 2025.

The *Gypsy and Traveller, Travelling Showperson and Houseboat Accommodation Assessment 2025* commissioned by Rugby Borough Council ('the Council') described it as Bryants Bungalows (multiple site covering Bryant's Bungalow, land south-west of Bryant's Bungalow and West of Bryant's Bungalow) with 23 no. pitches. The site of the proposed allocation obtained planning permission in February 2019 (Application No. R18/1555) for the change of use of land to form a residential caravan site for 10 gypsy and traveller families together with the erection of amenity buildings.

As can be seen from Figure 2, the site comprises large areas of hardstanding, extensive boundary landscaping and vegetation and a block of coniferous woodland, the latter lying between the site and Brandon Lane. Access is taken from Brandon Lane, which connects to the A45 London Road to the south and lies to south of the Coventry Eastern Bypass (A46) and south-east of the Tollbar End junction. The site lies to the north-west of Ryton-on-Dunsmore and on the edge of Coventry, within the West Midlands Green Belt.



Figure 2 – Existing Site at The Bryants, Brandon Lane (Google Earth)

Representations on Proposed Submission Local Plan

Overall, our clients are very supportive of the proposed allocation of the site at The Bryants, Brandon Lane, Ryton-on-Dunsmore for 10 no. additional pitches for gypsies and travellers and Policy S4 "Sites for Gypsies and Travellers" of the Proposed Submission Local Plan. Nothing in this representation should be construed as anything other than support for this part of the Proposed Submission Local Plan. An indicative layout plan for the 10 no. additional pitches on the site is included at Appendix 1 to this representation.

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Soundness Tests

In terms of the “soundness” of the allocation and policy, having regard to Paragraph 36 of the *National Planning Policy Framework* ('NPPF'), our clients consider that Policy S4 and the allocation at The Bryants is justified, being an appropriate strategy and focusing on an existing established and suitable site, capable of accommodating additional pitches, which is supported by the evidence in the *Gypsy and Traveller, Travelling Showperson and Houseboat Accommodation Assessment 2025* commissioned by Rugby Borough Council, undertaken by arc4 and published in February 2025 and the Plan’s *Sustainability Appraisal* produced by Aecom.

The proposed allocation at The Bryants and via Policy S4 should be effective in being deliverable over the Plan period, as our clients would be willing and capable of submitting a planning application for the additional 10 pitches in a short, realistic timescale to ensure delivery and availability by the time the Proposed Submission Local Plan is adopted or earlier, if acceptable to the Council, as local planning authority.

Finally, the allocation and Policy S4 are consistent with national policy, enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, including the NPPF and the Government’s *Planning Policy for Traveller Sites 2024* ('PPTS'), which states that '*local planning authorities should make their own assessment of need for the purposes of planning*' and '*ensure that their Local Plan includes fair, realistic and inclusive policies*' and '*to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply*'.

Whether the Proposed Submission Local Plan has been positively prepared is addressed below.

Possible “Lost” Opportunity

The evidence base for the Proposed Submission Local Plan provided by the *Gypsy and Traveller, Travelling Showperson and Houseboat Accommodation Assessment 2025* identifies an overall minimum need for 94 additional Gypsy and Traveller pitches across Rugby Borough over the period 2024/25 to 2041/42. Of this need, 35 are needed in the first five years and 59 over the period 2029/30 to 2041/42. The annual net shortfall need is 5.2.

However, the Council’s recent track record in securing additional pitches in accordance with Policy DS2 of the *Rugby Borough Local Plan 2011-2031* has fallen well below this need requirement, as evidenced by the *Authority Monitoring Report 2024-2025*. See Figure 3 below.

POLICY DS2: SITES FOR GYPSY, TRAVELLERS AND TRAVELLING SHOWPEOPLE

5.8 The numbers of pitches approved are as follows

Monitoring Period	Pitches Approved
2017-2022	20
2022-2023	3
2023-2024	1
2024-2025	1

Figure 3 - Authority Monitoring Report 2024-2025

This is picked up in the *Sustainability Appraisal (SA) of the Rugby Borough Local Plan Report December 2025* by Aecom. Paragraph 5.2.60 of the SA states:

'For context, it is important to note that the adopted Local Plan 2011-2031 did not allocate land for pitches, which has had consequences not only for the Travelling community but also more widely in that the Council is often unable to resist unauthorised development and Traveller pitches have been approved on appeal; indeed, the Council has already lost two Gypsy and Traveller appeals in 2025.'

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The SA goes on to state at Paragraph 5.2.61 that:

'Moving forward there is a need for a step change in respect of providing for Traveller accommodation needs, not only because failing to provide for accommodation needs has major consequences for the Travelling community, but also because failing to take a suitably proactive approach would represent a risk to the soundness of the Local Plan. In the case of the 2011-2031 Local Plan examination the Inspector was persuaded that a subsequent Gypsy and Traveller Site Allocations DPD would allocate land for pitches, but that DPD was abandoned, which is a common issue nationally.'

This SA advice, however, has not been heeded in the Proposed Submission Local Plan, except in the proposed provision up to the mid-2030's.

Policy S4 states that since completion of the *Gypsy and Traveller Accommodation Assessment 2025* ('GTAA') planning permission has been granted for 14 further pitches. The GTAA identifies the potential for household dissolution to provide a supply of 9 pitches in the period to 2041/42 and with new allocations for 45 pitches being made, including 10 at The Bryants, a total supply of 68 pitches is identified, adequate to provide supply to beyond 2035.

The allocation at The Bryants is supported by the Sustainability Appraisal, which states at Paragraph 5.2.63 that:

'There is now an opportunity to take a strategic approach (no local plan for the Borough has ever allocated sites for Travellers) and the current proposed approach is broadly unchanged from that at the Draft Plan stage, with three categories of allocation:

Secondly, new/expanded private sites at Bryant Bungalow, Brandon Lane, and Wilsher Ranch, Shilton Lane. Both of these sites were previous allocations at the Draft Plan stage, and the Interim SA Report flagged limited concerns. The former would involve expansion of an existing site, and the latter is in proximity to existing sites, which suggests good potential to provide for needs arising from existing sites.'

The GTAA states that due to a number of trends impacting upon gypsies and travellers, the need or demand should be seen a minimum (94 pitches) yet provision or supply in the Proposed Submission Local Plan to 2042 falls short – 68 pitches – leading to an undersupply of 26 pitches.

We therefore have some concerns that in respect of being positively prepared there is a risk that the Local Plan's strategy for meeting the need for gypsy and traveller pitches in the Borough may not meet the area's objectively assessed needs for such provision, especially in the second half of the Plan period.

This is echoed by the Sustainability Appraisal, which states at Paragraph 5.2.64:

'This would be adequate to demonstrate supply until the mid-2030s, plus there may be some windfall. Whilst in theory there is a need for ongoing consideration of higher growth scenarios, in practice there are limited options....'

Whilst the allocation of our clients' site at The Bryants for 10 additional pitches, is in line with the GTAA's recommendation for intensifying and expanding existing sites to help meet five-year and longer-term need, which is supported by the Plan's *Sustainability Appraisal*, there is a potential "lost" opportunity by not exploring the realistic option of providing more pitches at The Bryants, an established existing site in an area where other possible options are limited.

This (i.e. provision of more pitches at The Bryants) would help meet existing need, assist with the "soundness" tests of the Proposed Submission Local Plan and also provide some flexibility and robustness in the Local Plan for any additional need that may arise over the Plan period, for instance from a higher number of households moving into Rugby Borough than anticipated, whilst delivering sustainable development.

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Conclusion

Overall, our clients are very supportive of the proposed allocation of the site at The Bryants, Brandon Lane, Ryton-on-Dunsmore for 10 no. additional pitches for gypsies and travellers and Policy S4 "Sites for Gypsies and Travellers" of the Proposed Submission Local Plan. Nothing in this representation should be construed as anything other than support for this part of the Proposed Submission Local Plan.

Our clients raise no concerns about the legal compliance and "Duty to Co-operate" elements of the Proposed Submission Local Plan and consider that the Plan is justified, effective and consistent with national policy, thereby meeting these "soundness" tests of the *National Planning Policy Framework*.

Our only concerns are about whether the Plan has been positively prepared because of the risk that the Local Plan's strategy for meeting the need for gypsy and traveller pitches in the Borough may not meet the area's objectively assessed needs for such provision, especially in the second half of the Plan period, as highlighted in the Plan's *Sustainability Appraisal*.

There is a potential "lost" opportunity by not exploring the realistic option of providing more pitches (over and above the additional 10 pitches provided for as part of Policy S4) at The Bryants, an established existing site in an area where other possible options are limited. This would help meet existing need, assist with the "soundness" tests of the Proposed Submission Local Plan and also provide some flexibility and robustness in the Local Plan, especially in the second part of the Plan period after 2035.

We trust that this representation by our clients is of assistance to the Council and Inspectors tasked in the future with the examination of the Proposed Submission Local Plan. However, should you require any further information please let me know.

We include alongside this representation in conjunction with a copy of a *Local Plan Publication Stage Representation Form*.

Yours faithfully,

Duncan Chadwick
Managing Director

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APPENDIX 1 - INDICATIVE SITE LAYOUT FOR 10 NO. ADDITIONAL PITCHES

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