

## 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 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto: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="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Rajvir"/>	<input type="text"/>
Last Name	<input type="text" value="Bahey"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text"/>
Address Line 1	<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"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text" value=""/>	<input type="text"/>

(where relevant)

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

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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" value="W1"/>	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"/>	No	<input type="text"/>
(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.

Sport England supports the objective of the restoration of Coventry Stadium, Brandon for speedway and stock car racing and other motor sports together with other community uses.

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.

Not applicable

(Continue on a separate sheet /expand box if necessary)

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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)

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

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Name or Organisation:

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	W1	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" 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 checked="" 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.

Sport England welcomes the Council's intention to protect community facilities; however, the inclusion of sports facilities (sport and recreational buildings and land, including playing fields) within the remit of Policy W1 is not consistent with national planning policy.

Policy W1 states that proposals resulting in the loss of sports facilities could be permitted if there is:

- i) alternative provision of equivalent or better quality, that is easily accessible to that local community, is available or will be provided prior to commencement of redevelopment; or
- ii) there is no reasonable prospect of retention of the existing use as it is unviable as demonstrated by a robust viability assessment and all reasonable efforts to secure suitable alternative business or community re-use have been made through independent marketing of the property at a valuation reflecting its current use for a minimum of 12 months prior to application submission.

Sport England objects to the introduction of the WIA criteria, as their application would imply that proposals affecting open space, sports and recreational buildings and land—including playing fields—would *not* be required to demonstrate compliance with **NPPF paragraph 104(a)**.

NPPF paragraph 104(a) requires the submission of an assessment to establish whether the open space, sports and recreational buildings and land, including playing fields, are **surplus to requirements**, or to identify whether **replacement provision** is needed in accordance with **paragraph 104(b)**.

Neither Policy W1 nor its supporting text sets out what evidence would be required to demonstrate that there is **sufficient alternative provision** available or that **replacement provision** should be secured prior to the commencement of redevelopment. This lack of clarity fails to align the policy with national planning policy requirements and creates uncertainty for applicants, decision-makers, and stakeholders.

In relation to WIA(ii), Sport England considers that a marketing exercise and viability assessment **cannot** demonstrate that a sports facility is surplus to requirements. A lack of commercial interest or viability does not equate to a lack of **demand** for the facility. There may be several other factors influencing use—such as lease or hire costs being unreasonably high compared to similar facilities in the local area, facilities being unsafe due to dereliction, or access being restricted—which would not justify concluding that a site is surplus.

The recent Coventry Stadium appeal decision (APP/E3715/W/23/3322013) confirms this principle, establishing that **lack of use, disrepair, or viability considerations are not relevant factors** when determining whether a sports facility is surplus to requirements under **NPPF paragraph 104**. This reinforces the need for an **objective assessment of need**, rather than reliance on market-based indicators or site-specific viability considerations.

It is also unclear how the sites listed in paragraph 7.2 of the consultation document have been identified as being of Borough-wide significance, and whether sites not included in that list would fall within the remit of the policy. For example, the artificial hockey pitches at **Bilton Grange Preparatory School** and **Rugby School** are of clear significance to hockey provision in the Borough; the loss of either would result in teams having to relocate to venues outside the authority. Similarly, new facilities may come forward in future that are of Borough-wide significance but are not currently referenced in paragraph 7.2, raising questions about how such sites would be treated.

If proposals come forward on sites **not** listed in paragraph 7.2, it is unclear whether these would be assessed against **Local Plan Policy W2(f)**. This lack of clarity creates uncertainty about the application of the policy, the protection afforded to existing sports facilities, and the overall effectiveness and consistency of the Local Plan in relation to national planning policy.

No reasoned justification has been provided as to why an alternative policy (or additional layer of policy) is now considered necessary, nor have the potential implications of this change for the protection of sports and recreational sites been explored. It is also unclear whether development proposals affecting the listed sports and recreational sites would additionally fall under the remit of Local Plan Policy W2(f), further contributing to uncertainty regarding how these sites would be assessed.

It is therefore considered that the proposed wording of Policy W1 conflicts with national planning policy. The lack of clarity regarding its application renders the policy ineffective and introduces uncertainty into the decision-making process, ultimately undermining the protection afforded to sports facilities.

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.

To ensure that Policy W1A is **fully consistent with national planning policy** and **effective in guiding decision-making** on proposals affecting open space, sports and recreational buildings and land (including playing fields and formal play spaces), the following modifications are sought:

1. **Remove sports and recreational facilities from the remit of Policy W1**

Proposals resulting in the loss of open space, sports and recreational buildings and land, including playing fields and formal play spaces, should be **deleted from the scope of Policy W1**.

This includes the **removal of the supporting text at paragraph 7.2**, as its inclusion is inconsistent with national policy requirements for the assessment of such facilities.

2. **Clarify that Policy W2(f) governs proposals affecting sports and recreational facilities**

Policy W2(f) should be **amended to explicitly state** that any proposal affecting open space, sports and recreational buildings and land, including playing fields and formal play spaces, will be **assessed against the relevant national planning policy**—currently **NPPF**

**paragraph 104—without any cross-reference to Policy W1.**

This amendment is necessary to ensure clear policy hierarchy, alignment with the National Planning Policy Framework, and effective protection of sports facilities.

(Continue on a separate sheet /expand box if necessary)

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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)

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(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	<input type="text"/>	Local Plan Policy	<input type="text" value="W2"/>	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"/>	No	<input type="text" value="x"/>
(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.

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Sport England considers that Policy W2 as drafted is not effective as it is unclear how proposals on open space, sports and recreational buildings and land, including playing fields and formal play spaces will be assessed. This is due to Policy W2 (f) cross referencing Policy W1, which states that proposals resulting in the loss of sports facilities could be permitted if there is:

- i) alternative provision of equivalent or better quality, that is easily accessible to that local community, is available or will be provided prior to commencement of redevelopment; or
- ii) there is no reasonable prospect of retention of the existing use as it is unviable as demonstrated by a robust viability assessment and all reasonable efforts to secure suitable alternative business or community re-use have been made through independent marketing of the property at a valuation reflecting its current use for a minimum of 12 months prior to application submission.

Sport England objects to the introduction of the WIA criteria, as their inclusion implies that the requirements of NPPF paragraph 104(a) would not need to be demonstrated. Paragraph 104(a) of the NPPF requires applicants to submit an assessment to determine whether open space, sports and recreational buildings and land—including playing fields and formal play space—are surplus to requirements, or whether replacement provision is required in accordance with paragraph 104(b).

Neither Policy W1 nor its supporting text sets out what evidence will be required to demonstrate that sufficient alternative provision exists, or that replacement provision will be delivered prior to the commencement of redevelopment. This creates uncertainty and risks inconsistent application of the policy.

In relation to WIA(ii), Sport England does not consider that a marketing exercise or viability assessment demonstrates that a sports facility is surplus to requirements. A decline in use or viability may arise from other factors such as disproportionate hire costs when compared to similar facilities, sites falling into disrepair and becoming unsafe, or access being restricted. The recent Coventry Stadium appeal decision (APP/E3715/W/23/3322013) confirms that lack of use, disrepair or viability issues are not relevant considerations when determining whether a sports site is surplus to requirements under NPPF paragraph 104.

Furthermore, Policy W1 paragraph 7.2 lists a number of indoor and outdoor sport sites that are described as being of borough-wide significance and subject to assessment under Policy W1. However, the policy does not explain how these sites were selected. It is also unclear whether sites not included in paragraph 7.2 would instead be assessed against national policy through Policy W2(f). This uncertainty reduces the clarity and effectiveness of the aforementioned policies.

For these reasons, Sport England objects to Policy W2(f), given that it cross-references Policy W1, which as drafted is neither effective nor consistent with national planning policy (NPPF paragraph 104).

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.

To ensure that Policies W1 and W2 are consistent with national planning policy and are effective in providing clarity for decision makers assessing proposals relating to open space, sports and recreational buildings and land—including playing fields and formal play spaces—the following modifications are sought:

1. **The removal of proposals resulting in the loss of open space, sports and recreational buildings and land, including playing fields and formal play spaces, from the remit of Policy W1 and its supporting text (paragraph 7.2).** These matters should not be assessed under Policy W1, given that the policy does not reflect the requirements of national planning policy (NPPF paragraph 104).
2. **Amendment of Policy W2(f) to explicitly state that development proposals affecting open space, sports and recreational buildings and land—including playing fields and formal play spaces—will be assessed against the relevant national policy (currently NPPF paragraph 104), with no cross-reference to Policy W1.** This modification is necessary to ensure clarity, consistency with the NPPF, and effective decision-making.

(Continue on a separate sheet /expand box if necessary)

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**No**, I do not wish to participate in hearing session(s)

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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" value="W2 and appendix 3"/>	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"/>
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Sport England notes the use of standards for playing pitches within Policy W2A, derived from the Council's Playing Pitch and Outdoor Sports Strategy (PPS) and elements of the Sport England's Playing Pitch Calculator (PPC).

However, Sport England wishes to highlight that these standards are based on team numbers, membership levels, and population figures at a fixed point in time. To ensure that demand for pitch sports remains accurate and up to date, team and membership numbers for each sport should be reviewed regularly—ideally on an annual basis—in line with Sport England guidance on maintaining up-to-date PPS documents. This is particularly important to capture changes such as the growth in women's and girls' participation following the success of the England Lionesses and Roses. At present, the policy provides no mechanism for such periodic

It is also noted that the standards do not take into account ancillary infrastructure—such as car parking and changing accommodation—which is essential to support the operation of playing field sites and has implications for land take and cost, as referenced in Appendix 3.

Sport England is also unclear whether the standards will be used to determine whether new provision or financial contributions will be sought under Policy W2B. Sport England would object to such an approach, as it fails to consider the quality of existing pitch provision and whether sites are already overplayed. Furthermore, the PPS is not structured around ward boundaries; therefore, Policy W2B should make clear that this criterion is not applicable to playing pitch typologies.

Regarding Policy W2E, the policy refers only to contributions being assessed in line with the Playing Pitch & Outdoor Sport Strategy. Sport England considers that this wording should be expanded to explicitly require that decisions on on-site provision or off-site contributions are informed by the Strategy.

Given the above, Sport England considers that the policy is not effective. The application of the standards is unclear, and key aspects—particularly ancillary provision—have not been adequately addressed.

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.

Sport England considers that the effectiveness of the policy could be improved by the following measures:

1. **Provide explicit clarity that the pitch standards will be reviewed regularly** in line with updated team and membership numbers, to ensure that demand assessments remain accurate and up to date.
2. **Confirm that Policy W2B is not applicable to the playing pitch standards**, reflecting the fact that the PPS is not structured around ward boundaries and therefore should not be applied as a criterion for playing pitch typologies.
3. **Expand the wording of Policy W2E** to state that decisions regarding on-site provision or off-site financial contributions will be informed by the Playing Pitch & Outdoor Sport Strategy.
4. **Amend the policy and Appendix 3** to include clear requirements for ancillary sports provision—such as car parking and changing

