

## 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\*

*\*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="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Jenna"/>	<input type="text"/>
Last Name	<input type="text" value="Taylor"/>	<input type="text"/>
Job Title	<input type="text" value=""/>	<input type="text"/>
Organisation	<input type="text" value="Moto 45"/>	<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" value=""/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value=""/>	<input type="text"/>

## 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"/>	Policies Map	<input type="text"/>
Site ID	343				

4. Do you consider the Local Plan:

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

Site 343 has operated as a lawful commercial motocross (MX) facility since 1993 (Sui Generis use).

### **OVERCOMING HIGHWAYS/ACCESS CONCERNS**

The HELAA (Addendum) criticised the site's suitability owing to "concern about ability to create safe access given 50mph dual carriageway" and "lack of access for non-car modes".

The site regularly accommodates substantial activity, including event days generating approximately 100 vehicles, camping, vans, trailers, race transporters, motorhomes and commercial servicing vehicles. These traffic levels demonstrate that the site access and surrounding highway network have safely accommodated significant vehicle movements over a prolonged period. There is no record of accidents.

The site lies within an established employment corridor along the A45, within the Golden Logistics Triangle, and adjacent to strategic employment allocations identified on the Proposed Submission Policies Map. The HELAA does not adequately explain why employment use would be inappropriate in this established logistics location.

The site benefits from a unique direct gated access onto the A45 which has functioned for decades as the principal entrance to the lawful commercial operation. Photographic evidence (Appendix B and C) confirms a formed and engineered access, commercial-grade gates, hardstanding, and infrastructure consistent with long-standing commercial use.

The landowner has recently been in touch with the Highways Authority and advice identifies only a minor mitigation measure — relocation of the entrance gate approximately 11 metres inward. This confirms there is no fundamental highway safety objection, that access is acceptable in principle, and that any issue is minor and readily resolvable. Discounting

the site entirely despite straightforward mitigation is therefore unjustified. Please see attached (Appendix A) vision statement for with purposed gate entrance and site plan for potential storage use.

Moreover, supporting photographs (Appendices I to L) demonstrate significant numbers of vans and trailers during MX events, heavy plant and machinery deliveries, HGV-sized transporters accessing the site, and commercial lorry activity associated with site maintenance and operation.

A Coventry Live article documents the relocation of the Bayton Road Batch Van (Bayton Batch Bar) to Moto 45, including an article from the Coventry Evening Telegraph website showing photographic evidence of the unit being transported and operating from the site. The Bayton Road batch bar supporting operator statement confirms commercial use and associated vehicle movements.

<https://www.coventrytelegraph.net/whats-on/food-drink-news/popular-bayton-batch-bar-starts-24193497>

### **SUITABILITY TO PROPOSED B8 USE**

The landowner has undertaken a detailed survey of local need within a 0.5-mile radius of the site. The findings show that a number of local businesses, particularly HGV storage and car dealerships are experiencing significant difficulties with vehicle storage.

Allied Cars are also affected by the lack of available space and are currently required to store vehicles in Daventry due to the absence of suitable local facilities.

With the planned closure of Coventry Airport this year, several businesses that currently rely on that location will need to relocate, further increasing the demand for appropriate sites.

Supporting statements from other local businesses have also been provided, including Richard Brown Haulage. Following discussions on 3rd March 2026, this business has confirmed that it currently has no suitable relocation options when the airport closes and has identified Site 343 as a potential location for relocation should the site receive approval for the Local Plan and employment land. Please see attached (Appendix F) all business in support of the reconsideration of site 343 and a supporting statement from 3 business who are located at the Coventry Airport site.

Additionally, at present, the Citrus Hotel —currently accommodating asylum seekers—has a car park which is being used by both Toyota and Listers for vehicle storage. However, when the hotel reopens to the public, this space will no longer be available, creating an immediate shortfall in local storage capacity.

The assessment places weight on the site's non-car accessibility. However, the nature of the proposed B8 use is not applicable to transport methods such as walking, cycling or public transport.

### **GREEN BELT**

The site has also been discounted on Green Belt grounds. However, as acknowledged by the Council, the site is Brownfield / 'Previously Developed Land', and should be considered Grey Belt. (Appendix D & E).

Redevelopment of the site for a B8 use would unequivocally result in lesser harm than the existing lawful MX use.

The site has experienced a long history of environmental impacts associated with MX since it started in 1993. These impacts have included noise, dust generation, ongoing ground disturbance and intensive vehicle activity associated with event days and operational use; as a result of track reshaping, use by motorbikes and the regular use of machinery.

The site runs under the current noise abatement notice agreement made in February 2005, ref MEATP/35/7/50.

The redevelopment of brownfield land can provide a unique opportunity to improve environmental quality and landscape setting. Reassessment of Site 343 for B8 employment use would allow the introduction of structured landscaping, habitat creation, native planting and long-term ecological management, together with delivery of statutory Biodiversity Net Gain.

Moreover, there is a growing, proven, acute need for B8 land, for reasons discussed above. The contributions to 'Economic Sustainability' objective outlined in the NPPF – *"to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity"* - that B8 use of the site would provide are substantial and should carry significant planning weight.

Redevelopment of the site for a B8 use would therefore provide the opportunity to significantly reduce existing impacts through a more controlled operational environment, remove high-intensity acoustic impact and provide environmental mitigation measures.

'Very Special Circumstances' exist which weigh in favour of redevelopment, as per para 155 of the NPPF:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b. There is a demonstrable unmet need for the type of development proposed; and
- c. The development would be in a sustainable location, with reference to paragraphs 110 and 115.

Generally, benefits of redevelopment from MX to B8 include:

- the existence of a lawful fallback use generating greater environmental impacts;
- the opportunity to significantly reduce noise, dust and uncontrolled activity;
- the reuse of previously developed land;
- established commercial character and long-standing operational use;
- direct access to the strategic road network;
- demonstrable demand for employment-related B8 use;
- identified operator interest confirming deliverability; and
- opportunities for biodiversity enhancement and environmental improvement

### **ECOLOGY IMPACTS**

The site assessment refers to the proximity of Brandon Marsh SSSI, the River Avon and associated Local Wildlife Sites. The site is not located within the Brandon Marsh SSSI designation but lies within the Outer Impact Risk Zone. Being within an Impact Risk Zone does not equate to being within the designated site itself; rather, it indicates that consultation may be required for certain forms of development. Development is confined to land outside the SSSI boundary, and any future planning application would be supported by appropriate ecological assessment and, where necessary, mitigation and enhancement measures in accordance with national and local policy.

It is also material that adjoining and nearby land accommodates established storage uses, scrap and recycling operations, and significant employment development, including Prologis, DHL, the Mountfield development (Site 50), the Prologis Ryton extension (Site 51), and Sites 70 and 71. Parts of this surrounding land fall within or adjoin areas subject to equivalent environmental designations.

The Council existing and strategic employment map also shows that a few allocated or promoted employment sites within the wider area, including Sites 50, 71 and 72, lie within or adjacent to the SSSI designation. This demonstrates that the wider area already contains land subject to environmental designations and that proximity to the SSSI has not precluded the consideration or promotion of employment development elsewhere.

Accordingly, the site's location within the Outer Impact Risk Zone, or its proximity to designated ecological assets, should not be treated as a determinative constraint at plan-making stage.

Accordingly, proximity to Brandon Marsh SSSI and related ecological designations does not provide a sound or proportionate reason to discount the site at Local Plan stage.

In fact, given the site's physical characteristics, are substantial biodiversity net gain can be provided on the site, linked with a development proposal.

### **FLOOD RISK**

The assessment states that part of the site lies within Flood Zone 2 and therefore identifies medium flood risk as a key constraint.

This conclusion does not accurately reflect the land being promoted for allocation. While a limited portion of the wider landholding lies within Flood Zone 2, this area is expressly excluded from the proposed employment allocation and will be retained for agricultural use and biodiversity enhancement.

The proposed development area relates solely to the land outside the blue flood zones, identified as Flood Zone 1. No built development is proposed within areas at risk of flooding. Land within Flood Zones 2 and 3 adjacent to the river corridor will instead be retained as green and blue infrastructure, providing opportunities for biodiversity enhancement, habitat connectivity and sustainable drainage.

The proposed retention of green and blue infrastructure within the site provides opportunities to enhance ecological connectivity and deliver biodiversity net gain.

(Appendix G)

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.

I respectfully ask that moto 45 is reconsidered for the local plan

**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:

I would be happy to answer any questions raised by inspectors and would appreciate the opportunity to discuss the application further

*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.

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-notice>













23:34



6 March 2022

10:49





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once it was loaded, changed the physical look of the place. People were watching us and it felt a bit like being in a goldfish bowl."

So with a whole new area to serve, completely different customers, what can people expect at Bayton Batch Bar?

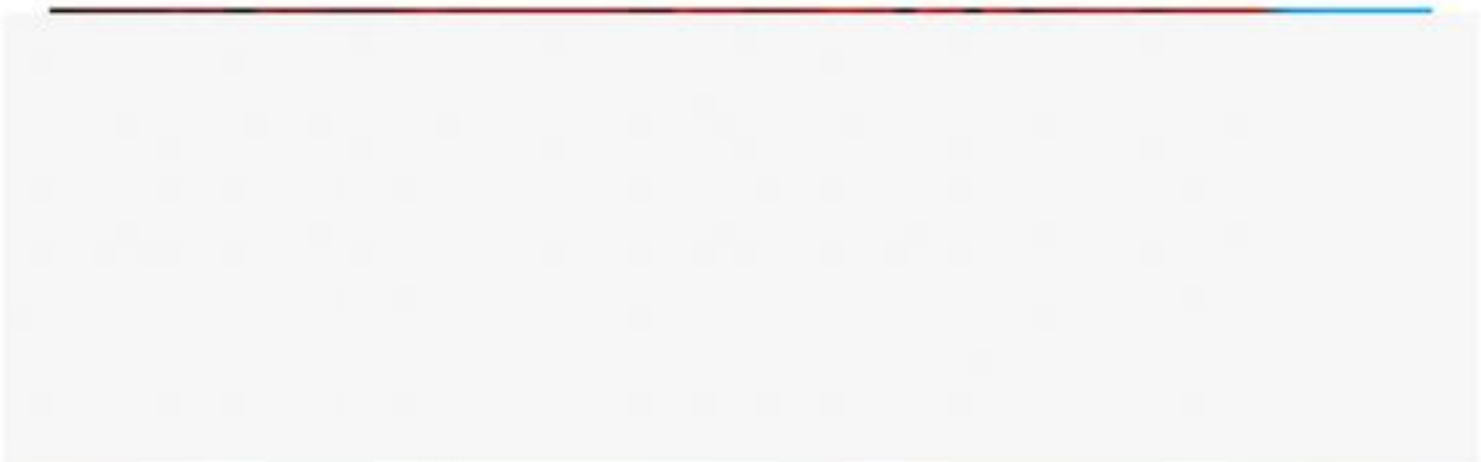


Ellen at Bayton Batch Bar's new location at Moto 45 (Image: Ellen Makepeace)

Article continues below

AD

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## Flood map for planning

Search  Key

**Details** ✕

Planning and Mapping	437277.275264
Frame	Present day
Flood zone	1

**Updates to flood zones 2 and 3**

Flood zones 2 and 3 have been updated to include local detailed models, and a new improved national model.



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