

# 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) |
|---------------------------------|------------------------------------|
| Title                           |                                    |
| First Name                      |                                    |
| Last Name                       |                                    |
| 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) – Coventry Stadium, Brandon (Motorsport Use)

Policy W1(B) explicitly supports the restoration of Coventry Stadium for speedway and stock car racing. While recognising the historical role of the site, the policy as currently drafted raises significant concerns regarding consistency with national planning policy, environmental legislation, and the evidence-led approach required for sound Local Plan preparation.

### Lack of evidence and justification

The policy appears to safeguard and promote a specific land use without clear or proportionate supporting evidence. The National Planning Policy Framework (NPPF) requires Local Plans to be justified through robust, up-to-date evidence demonstrating that proposed policies represent the most appropriate strategy when considered against reasonable alternatives.

In this case, there is insufficient evidence to demonstrate that the reintroduction of high-intensity motorsport activity remains the most suitable or sustainable use of the site, particularly given evolving environmental standards, changing community needs, and the likely presence of new residential development in close proximity.

### Environmental duties and biodiversity considerations

Since motorsport activities ceased, the site has experienced a prolonged period of reduced disturbance. This may have enabled habitats to establish and biodiversity to recover. The Environment Act 2021 places clear duties on planning authorities to secure biodiversity net gain and contribute to nature recovery.

Supporting the reinstatement of potentially high-impact motorsport activities without requiring comprehensive ecological assessment risks conflicting with these statutory obligations. The NPPF similarly requires planning policies to protect and enhance biodiversity, minimise impacts on

habitats, and strengthen ecological networks. Policy W1(B) does not clearly demonstrate how these responsibilities would be fulfilled.

## **Noise, air quality and public health impacts**

Speedway and stock car racing are associated with significant noise levels, engine emissions, lighting impacts and event-related traffic. The surrounding area is expected to accommodate new residential development, meaning more families including children and vulnerable residents, may be exposed to these impacts.

The Noise Policy Statement for England requires planning authorities to avoid significant adverse effects on health and quality of life. Ethical considerations arise where planning policy actively supports a land use that may generate substantial environmental stressors for future communities without requiring detailed assessment or clear mitigation measures.

Repeated high-intensity noise events can adversely affect both human wellbeing and wildlife behaviour. Similarly, air quality impacts associated with fossil fuel engines raise concerns in the context of respiratory health and environmental justice. The policy currently lacks safeguards ensuring that noise, air pollution, and cumulative environmental effects are properly assessed before support is given.

## **Climate and sustainability objectives**

Planning policy must support the transition to a low-carbon future and minimise environmental harm. Motorsport activities typically involve fossil fuel engines, increased traffic generation, and associated emissions. Policy W1(B) does not demonstrate how actively supporting such uses aligns with climate change objectives, local sustainability priorities, or broader public health goals.

## **Consideration of reasonable alternatives**

Local Plans should be positively prepared and consider reasonable alternative uses. The site could potentially contribute to biodiversity enhancement, accessible green infrastructure, community recreation, or other lower-impact uses that promote health, environmental resilience, and wellbeing. By explicitly prioritising motorsport restoration, the policy may unduly constrain alternative options without proper comparative assessment.

## **Policy wording and perception of bias**

The wording stating that the Council “supports the restoration” of a specific activity is unusual within a strategic planning context. Local Plan policies typically provide objective criteria for assessing proposals rather than advocating for a particular development outcome.

Such wording risks creating a perception of policy bias and may undermine confidence that future planning applications will be assessed fairly and transparently against environmental, health and public interest considerations.

## **Conclusion**

For the reasons outlined above, Policy W1(B) cannot currently be considered justified, effective, or consistent with national planning policy. Without stronger evidence, clearer environmental safeguards, and a more balanced policy framework, it fails to meet the tests of soundness required for Local Plans.

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.

## **Proposed Modification to Policy W1(B)**

In order to address the soundness concerns identified above, Policy W1(B) should be amended to remove prescriptive support for the restoration of motorsport activities at Coventry Stadium, Brandon. Local Plan policies should provide a clear, criteria-based framework for assessing future proposals rather than promoting or pre-determining a particular development outcome.

The current wording risks prejudicing the objective consideration of future planning applications and may undermine confidence that environmental, health and community impacts will be assessed in a balanced and evidence-led manner.

### **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, climate change objectives, residential amenity, transport impacts, and the health and wellbeing of existing and future communities.”

### **Evidence-led assessment requirements**

To ensure compliance with national planning policy, statutory environmental duties, and the precautionary principle where potential harm may arise, any proposal involving motorsport or other potentially high-impact activities should be required to demonstrate, through independent and proportionate evidence:

- Comprehensive ecological surveys and habitat assessments, reflecting the site’s period of reduced disturbance and potential biodiversity value;
- Compliance with Biodiversity Net Gain requirements under the Environment Act 2021;
- A detailed Noise Impact Assessment consistent with the Noise Policy Statement for England, addressing cumulative and long-term impacts;
- Air quality assessment, including consideration of emissions from motorsport activity and associated traffic movements, and potential public health implications;
- Transport and environmental impact assessment, including event-related traffic, carbon emissions, and wider sustainability considerations; and
- Meaningful and transparent community engagement, including exploration of reasonable alternative uses aligned with environmental enhancement and community wellbeing.

### **Rationale**

These amendments would ensure that the Local Plan is positively prepared, justified by proportionate evidence, effective in guiding future decision-making, and consistent with national planning policy, including the National Planning Policy Framework.

Removing prescriptive support for a specific high-impact use would strengthen the policy by ensuring that future proposals are assessed objectively against environmental protection duties,

public health considerations, climate obligations, and the long-term interests of both existing residents and families expected to occupy newly developed homes in the surrounding area.

**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 is both necessary and appropriate to ensure that the lived experience and evidence of local residents are properly considered as part of the examination process.

Residents living in close proximity to the site are uniquely placed to provide first-hand evidence regarding the environmental character of the area, the presence and behaviour of existing wildlife, baseline noise conditions, traffic patterns, and the likely effects that the reintroduction of motorsport activities could have on residential amenity, public health, and overall wellbeing.

Given that Policy W1(B) provides explicit support for a particular land use, it is essential that the Inspector hears directly from those who may be most affected by its implementation. Local residents can assist the examination by providing contextual evidence that may not be fully captured within strategic-level documents, including cumulative and experiential impacts.

Community participation will also support the Inspector in assessing whether the policy has been prepared on the basis of robust, balanced and proportionate evidence, and whether it properly reflects local environmental conditions, biodiversity interests, and community priorities.

For these reasons, it is both reasonable and necessary that local residents are afforded the opportunity to participate in the hearing sessions to ensure a fair, transparent and comprehensive examination process.

**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-notice>