

LETTER OF OBJECTION – MAY 2025

Wolvey Village Hall
Foundation CIO
The Square
Wolvey
Warwickshire
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To whom it may concern
Rugby Borough Council Planning Department

Preferred Option Public Consultation – Ref Sites: 96, 309, 318, 104 & 84.

We write to formally object to Rugby Borough Council (RBC) preferred option for 710 new houses to be built on Green Belt in Wolvey Warwickshire, as referenced above. We detail below the areas of concern (in no particular order) in the due process, issues regarding to contradictions to RBC's own policies and procedures, through the evidence as provided onto the NPPF Golden Rules etc...

It concerns us that your own references to parts of the process being a desktop study and numerous evidence packs and studies are still not started let alone completed and submitted for review, for example: Flood Evidence, Housing Evidence Habitats Study, Green belt Contribution Study, Strategic Transport Study, etc... Despite a request at one of the recent "presentations" you are unable to supply these and or any dates as to when they will be completed for review and comment. This is worrying when our closing date for responses is 19th May 2025!

Firstly one of the easier issues; we refer to the Rural Sustainability Study, your scores for Wolvey in table 4.1 show Wolvey scoring 35 points, the lowest in the proposed developments. However using your methodology Wolvey only scores 31 points! Appendix A scoring table is incorrect in 2 of the columns as we have 2 pubs / eating houses which according to your methodology and statements under Section 3.13. and 4.3. are only counted once but these have been counted twice. Further to this the allocation of points for a library is incorrect as we do not have a regular mobile library visit anymore as it is only on a very ad hoc basis. Therefore the 4 points should be deducted taking Wolvey score to 31 putting us below Newton! We also refer you to "Urban and Rural Area definitions for Policy Purposes in England and Wales: Methodology (v1.0)", which we believe would downgrade Wolvey outwith your terminology as a "Main Rural Settlement".

Whilst on the rural theme we question your own evaluation of Wolvey suitability with regards to the public transport which your own teams score Wolvey with the lowest at 1a with no enhancements planned!

Secondly Site 104 to the rear of Croft Way you label the site as being "Not Progressed" we quote "The site has awkward access involving demolishing an existing property. This is unsatisfactory in design terms and for this reason, the site is not progressed"? However continue into the report and you find Site 318: STRATEGIC – Land to south of Wolvey where you have joined this site up with site 96 and miraculously it becomes an opportunity to

increase the build to 520 from 500 homes? We can only assume this means the access will be from site 96 and the inclusion of the dwelling to be demolished in site 104 is a typo and should be removed from this plan (along with all the other proposed dwellings).

Thirdly dealing with the Landscape Sensitivity Reports 2016 produced by WCC Landscape Architects for RBC and the recently published; Landscape Sensitivity Assessments – Larger site dated December 2024 and Smaller Sites dated March 2025. The only fundamental changes to Wolvey between these dates are the demolition of the Galliford Try site and the ongoing building works, other minor planning builds and the Coventry Road site which has still not started. However the 3 reports could not be further apart and one may question whether the true terms and goals of the latter 2 reports were the same as the original report? Logic says that minor discrepancies may be found in wording but not the substantial changes to the outcomes and recommendations to all the areas covered in the latter reports. It is as if the reports are on different geographical areas completely! We are not going to list all of the contradictions and inconsistencies here needless to say these reports need to be cross read, scrutinised and compared BEFORE any decision is made on the suitability of the land in question for building.

Fourthly we would challenge the Green Belt issues which you seem rather ignorant to their importance. We are guardians of the countryside and any changes to fields etc... must be given the highest scrutiny. Once built upon or developed it will NEVER be returned to Green Belt. Do you want to be the generations remembered and the destroyers of our children, grandchildren and future generations countryside? We hope not. RBC are doing this the wrong way around. You should have exhausted all the Brownfield Sites and the Grey Belt sites before you attack the Green Belt. However this has not been the case and you are only now looking at potential Grey Belt sites, having moved onto the easy targets first i.e. the Green Belt at Wolvey to name just one! It is quite disappointing to see one of your Planning team posting on a public website that there is “No Green Belt to North of Rugby”. Maybe they should read your own documentation and visit the Government websites! If we continue using Green Belt for building where will we grow our food and how will the carbon capture happen when there is no greenery?

Let us start with the Golden Rules as set out in the NPPF for dealing with Green Belt. In the new NPPF, the government outlines three key golden rules developers must adhere to, to gain approval in the Green Belt. We are sure you are aware of these and the reasons for their existence. However for clarity they can be found along with other helpful advices re this matter in Paragraph 156 of the new NPPF. From an initial review it appears that this process has not followed the Golden Rules and therefore it is currently unsound in its findings and recommendations.

Key elements of the rules are: Affordable housing, up to 50% with a minimum of 35% this translates into 355 No. and 248 in the latter. We have yet to see any development with this level of affordable housing. The developers will not spend this amount of money trying to meet this and therefore what would be your sanctions?

In your Economic Strategy document, Agenda 6 and associated documents regarding this “Local Plan” you have made sweeping statements such as, meeting your Corporate Priorities

of “a greener Rugby – to protect the environment and ensure the borough adapts to climate change”. There are a number of challenges and inconsistencies here where meeting Net Zero by 2030 is impossible (CL1), biodiversity Net Gain – again not achievable by destroying green fields and replacing with “Concrete” (EN4). This continues with the canopy cover targets of 20% (EN5). We challenge how you can plan any sort of sustainability by building 710 or even 100 homes in a rural village like Wolvey where each home will need their own transport (approx. 1500 vehicles) and this will further increase the strain on the roads and treble the amount of vehicle movements and pollutions the village encounters currently. Building in rural locations does not work, this is borne out by the Kingmakers View development where they are struggling to sell the new builds as there is nothing local to attract the buyers, consequently they are being let out.

You continue with the protection of community facilities – Here in our parish we have, Wolvey Village Hall, The Millennium Building, Baptist Chapel, Wolvey Bowls Club and the Playing Fields. Also we support the local wildlife with the Wolvey Wetland Trust. All of which offer superb facilities for the residents and neighbours to our parish. Again it seems you do not understand or know the people of Wolvey or what their village includes to propose additional community centres to threaten the existing from thriving in the future.

Moving on the other infrastructure areas of your plan, namely the Primary School which is oversubscribed at present and you solve this by recommending that they build more facilities there! Would this be over the side garden which is used extensively by the teachers in educating the children or maybe over the playing fields so there would not be sporting facilities there either? This is mirrored in the local high school which is a bus ride away at Bedworth. Introducing further strain on these will only add to the problems and not be a solution. We now move to the Doctors surgeries which again are at breaking point without further expansion available. Supported by a small part time surgery in the village (from Burbage surgery) and if you are on Bulkington Road (Bulkington surgery) or if you are on the outskirts, you may get service from Brinklow. Again this is not sustainable planning must not be progressed further.

Other infrastructure areas not addressed in your Plan, are the utilities and transport etc... Firstly the public transport links, almost non-existent, Power supplies are a challenge as National Grid are not hooking up any more generators in this region for the foreseeable future, communications, fibre broadband not available, potable water supplies at risk with regular pressure drops, as reported in one of your few evidence packs, drainage storm and foul attempts to leave the village in a 6” pipe which is woefully inadequate and regular blockages and problems are encountered and, finally, the road structure. This is already causing issues with the bridge in single file to Ansty and Wolvey used as a rat run when there are issues on the A5, M69 or M6. We also suffer more recently from the impact of the locally based carriers whose drivers use our local roads as short cuts etc... with vans and HGVs alike.

Regarding the flood risk, which is also incomplete, this needs to recognise the recent flooding of the river Anker and the fields exacerbated by the Kingmakers View development. Other areas of the river Anker are also a cause of concern with the proposed developments.

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We understand Local Plans need to be updated however these should never be done in isolation from the previous plan and or any supporting documents used therein. This appears to be what you have done without any learning and cognisance of the lessons from the previous plans and the hard work and efforts of both the experts and planning teams at the time.

As there are so many inconsistencies in your documents, we requested a Document Hierarchy to enable us to understand which are the lead documents and which are advisory. This was done, to 2 different officers, in person at the Village Hall but nothing is forthcoming so far.

We reiterate the lack of substantive evidence available and the lack of a timetable as to when these evidence packs will be available i.e. when will the grey belt challenges be published and subsequent reasoning regarding developing on the last resort green belt?

We believe there are areas of the Human Rights Act 1998 being breached by this plan and the continuation of this will be challenged. Below are some extracts: -

Article 6. Makes it unlawful for a public authority to act in a way that is incompatible with a person's rights under the European Convention on Human Rights (ECHR). This means public authorities have a duty to act compatibly with Convention rights.

Examples: *This could involve actions like a police officer arresting someone without a justifiable reason (Article 5, right to liberty and security), or a local council refusing to grant or granting planning permission in a way that disproportionately affects a person's right to respect for their home (Article 8, right to private and family life).*

Article 8. Right to respect for private and family life. Everyone has the right to respect for his private and family life, his home and his correspondence.

Article 27. (1) Everyone has the right to have access to— (a) health care services, including reproductive health care; (b) sufficient food and water; and (c) social security, including, if they are unable to support themselves and their dependants, appropriate social assistance.

By these actions you will be causing undue stress and harm to all the residents of Wolvey Parish with a 5-to-20-year build programme with massive disruption, noise, dust and vehicle pollution across the whole village and its neighbours. Your policies mention benefits being a key area of your corporate priorities however we fail to see any benefits for the future of Wolvey only blight.

There are number of references to which we would like a response herein and therefore await your responses as soon as practicable.

Yours faithfully

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