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'Rugby Borough Local Plan - Preferred Option Consultation Document
March 2025

Representations on behalf of Wolvey Parish Council

Introduction

Wolvey Parish Council (WPC) welcomes the opportunity to make representations on the Preferred Options Regulation 18 consultation for the emerging Rugby Local Plan.

It is acknowledged that representations submitted will be considered by Rugby Borough Council (RBC) when developing the 'pre-submission' (or 'publication') version of the plan.

In light of the magnitude of development proposed in the emerging plan, Wolvey Parish Council have sought the input of two Chartered Town Planners with more than 70 plus years' experience of both public and private sector planning.

In preparing a Local Plan, the Local Planning Regulations encourage 'consultation and engagement' in advance of producing a Plan which Rugby Council deem appropriate to submit to the Secretary of State for examination.

The current (Regulation 18) stage of plan preparation allows representations to be made that Rugby Borough Council must consider when preparing the next stage Local Plan (the 'Publication' or 'Proposed Submission version').

Multiple issues of concern have been identified following an initial assessment of the 'Preferred Options Consultation' and supporting evidence. These are addressed in this submission.

The representations will focus on the key issues raised in the draft policies and the proposed allocations. They will also identify deficiencies and inconsistencies in the evidence base supporting the plan and on the nature of engagement undertaken to date.

There is deep concern regarding the approach that Rugby Borough Council has taken in developing the Local Plan including the lack of engagement with Wolvey Parish Council (and other Parish Councils), particularly given the scale of growth proposed in Wolvey village and the impact it will have on local communities and detriment to the rural character of the village.

The representations seek to set out Wolvey Parish Council's areas of concern with emerging policy, but also where it is considered that the plan may not meet the tests of soundness contained within the National Planning Policy Framework (NPPF). Wolvey Parish Council are mindful of the substantial resource and financial cost (to the public purse) involved in producing and examining a Local Plan. The Parish

Council seeks to identify areas where the emerging plan appears to be unsound, i.e. not: a) Positively prepared; b) Justified; c) Effective; and d) Consistent with national policy. The Parish Council cannot support a Local Plan that could potentially be found unsound with the commensurate resource and cost implications.

Primarily, the Parish Council consider the strategic approach and scale of growth proposed for Wolvey to be substantially flawed and unjustified.

Wolvey Parish Council has chosen not to use the electronic response form as the supporting text and questions are 'leading' and do not allow for a fully justified response to be made.

Background

The Council's own evidence indicates that there are only some 357 dwellings in the main village of Wolvey. This evidence dates from 2024. A development of some 90 dwellings on the previously developed 'Galliford Try' site to the north-east of the village is largely complete.

The main village is entirely surrounded by the West Midlands Green Belt with the village envelope tightly drawn to control inappropriate development.

Levels of deprivation in Wolvey are below the district, regional and national averages. 51.1% of households are classified as not deprived compared to 48.1% across Rugby and 39.9% in the West Midlands and 42.5% in England.

The levels of very good health are above Rugby Borough, with the proportion of residents who consider that their health is very good being (58.4% in Wolvey compared to 47.7% across Rugby, 45.1% regionally and 47.2% in England).

The levels of unemployment are low at 2.1% and levels of self-employment at 11.5% higher than Borough, regional and national levels. Levels of economic activity, at 78.7%, are higher than Borough (73.5%); region (68.3%) and England (69.9%) levels.

Car ownership is very high. The proportion of households with no car is 7.4%, compared to 17.5% (District); 24.7% (region) and 25.8% (national).

Effective engagement

Wolvey Parish Council are very concerned that the 'Preferred Options Document' has been produced for wider public consultation without any direct engagement with the Parish Council, both in its role of Council and also as the Qualifying Body for the Wolvey Neighbourhood Plan (which is part of the Statutory Development Plan). Continuous and ongoing engagement is a fundamental part of the production of Local Plans. It builds trust, and allows communities to feel engaged in the process. The 'Preferred Options' document contains a substantial amount of proposed growth for

the village and the normal expectation (and previous experience) is that a collaborative approach is pursued.

Paragraph 26 of the National Planning Policy Framework (NPPF) clearly states:

“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.”

It is acknowledged that Wolvey Parish Council has the opportunity to make representations on the Preferred Options document. However, there is real concern that this represents ‘consultation’ and not ‘effective engagement’ or dialogue.

Previous Local Plan preparation has involved a collaborative approach whereby development has been proposed (and delivered) in a way that was acceptable to both the Borough and Parish Council. It is a source of real frustration that the Borough Council has chosen to progress a plan to this stage without meaningful dialogue with the Parish Council and the Neighbourhood Planning Group. It is not satisfactory for the LPA to simply point out that ‘this is only a Regulation 18 consultation’. It is clear that once specific sites are identified, discussions should already have taken place.

Notwithstanding this, Wolvey Parish Council are open to, and would strongly encourage, meaningful discussions in advance of preparing the Regulation 19 version of the Local Plan.

Draft Policy S1 - Spatial Strategy

Draft Policy S1 (part A) is a strategic policy that seeks to set out the most sustainable pattern of growth for new development over the plan period (up to 2045). The policy seeks to set out a hierarchy for accommodating growth focussing primarily on:

- Rugby urban area; then
- the Main rural settlements (which include Binley Woods, Brinklow, Clifton upon Dunsmore, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston and Wolvey), then:
- Other rural settlements

This is an entirely logical strategic approach. It promotes development in the most sustainable ‘urban’ area which is Rugby town. The urban area has the greatest access to services and facilities, employment, leisure, health, and the widest choice of transport modes, which enables maximisation of walking, cycling and public transport and avoids reliance on private car travel.

This strategic approach in Draft policy S1 is consistent with national planning policy contained in the NPPF and is the soundest and most widely used strategic approach

pursued by the majority of Local Planning Authorities (LPAs) which contain both urban and rural areas.

It is acknowledged that Wolvey is identified as a 'Main Rural Settlement' in Draft Policy S1. This is consistent with the adopted Local Plan 2011 – 2031. However, it is very important to note that Wolvey is the smallest and 'lowest ranked' of the Main Rural Settlements.

Wolvey Parish Council consider the settlement hierarchy set out in Draft Policy S1 to be reasonable and potentially sound. It is the quantity and distribution of growth arising from this that is questioned. The proposed distribution of growth does not reflect strategic policy S1.

Draft Policy S1 – proposed 2045 end date

Wolvey Parish Council do not support the 2045 end date to the Local Plan proposed in Draft Policy S1.

The NPPF promotes a minimum 15-year time horizon for Local Plans. It is acknowledged that longer plans can be used where strategic sites are promoted. In this case, no new strategic sites are proposed, only a continuation of the strategic sites from the adopted Local Plan 2011 to 2031.

The Council's latest Local Development Scheme (October 2024) indicates that the Local Plan will be adopted by April 2027. An end date of 2042 would therefore suffice.

Pursuing an end date of 2042 (rather than 2045) would reduce the overall housing requirement by 1,854 homes (3 years x 618 homes). This would allow the LPA to reduce the 'residual' housing requirements considered in Draft Policy S6, which are mostly proposed in less sustainable village locations.

If the plan were adopted in its current form, with a 2045 end date, it would 'lock-in' a dispersal strategy with future development being supported in unsustainable locations in rural areas that require the loss of substantial areas of Green Belt land.

A 2042 end date, with commensurate reduction of some 1,850 proposed homes, would allow Rugby Borough Council to effectively monitor delivery of the more sustainable 'committed and allocated' strategic sites in the urban area (contained in the adopted 2011-2031 Local Plan), without needing to expedite a less sustainable strategy of 'dispersed growth' in rural village locations within the Green Belt. The LPA are required to review the plan every 5 years so any under-delivery of allocations on strategic sites next to the urban area could be monitored and addressed.

A 2042 plan period with a reduction of 1,850 homes would also allow for the residual growth to be more consistent with Draft Policy S1. Some 1,190 homes on seven sites adjacent to the Rugby Urban Area are identified in Draft Policy S6, these are.

- Site 62 - Morgan Sindall House, Rugby - 90 dwellings

- Site 332 - Albert Street, Rugby - 25 dwellings
- Site 122 - Fenley Fields, Cawston, Rugby - 80 dwellings
- Site 40 - East of Kilsby Lane, Hillmorton, Rugby - 125 dwellings
- Site 334 - Land off Barby Lane, Hillmorton, Rugby - 380 dwellings
- Site 338 - Land south of Crick Road, Houlton - 250 dwellings
- Site 59 – Newton Manor lane, Brownsover – 240 dwellings

These sites are in sustainable locations and should be allocated. They would deliver the majority of the residual homes required (under policy S6) without substantial incursions into the less sustainable rural areas.

This approach would be more consistent with the thrust of the Draft Policy S1 in promoting sites in the most sustainable locations. The remaining shortfall of homes could be supplemented by other small sites adjacent to the urban area with more modest growth in the less sustainable main rural villages.

Wolvey Parish Council would be willing to discuss potentially suitable locations to accommodate proportionate housing growth within and adjacent to the village of Wolvey which could contribute towards overall housing delivery.

Draft Policy S2 – Strategy for homes

Draft Policy S2 sets out the proposed delivery locations for new homes.

A key area of concern for Wolvey Parish Council is that the 'strategy' proposed in Draft Policy S1 is not consistent with the proposed distribution of development identified in subsequent policies and allocations, particularly Draft Policies S2 and S6.

Draft Policy S2 carries forward the main strategic allocations from the previous Local Plan including South West Rugby, Houlton, and Eden Park (totalling 8,434 dwellings); other allocations (633 dwellings); commitments (minus a 10% non-implementation allowance) (679 dwellings) and a reasonable 'windfall' allowance (1,050 dwellings).

Existing allocations, commitments, and windfall allowances therefore account for some 10,796 homes. Continuing with existing allocated sites seems logical as they have been considered sound at examination and the LPA must continue to be certain that they will be delivered.

Draft Policy S2 (A) indicates that "To meet our future need for housing, 12,978 new homes will be delivered in the period 2024-2045 (618 each year)". If the plan period were 2024 to 2042, the requirement would be 11,124 new homes. This would only leave a very modest residual housing requirement of 328 new homes to be addressed through allocations in policy S6 (11,124 minus 10,796). There are already some 1,190 homes identified in Draft Policy S6 within and adjacent to the urban area

of Rugby that could meet this residual need and also provide a 'buffer' of some 850 homes.

Wolvey Parish Council therefore does not support Draft Policy S2. In particular the element of the policy that seeks 3,338 homes from new allocations under policy S6. These are mainly in the rural areas and mostly within the Green Belt.

It is acknowledged that some modest development could be accommodated in Wolvey and the other Main Rural Centres. However, the amount of growth proposed in these settlements is both unnecessary and unsustainable.

Draft Policy S2 promotes substantial growth in less sustainable locations and would require the loss of substantial areas of Green Belt land. The NPPF is clear that:

'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes' (para 110)

and, in the context of Green Belt:

'...Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...' (para 145)

'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.' (para 147)

Draft Policy S2 supports a strategy that encourages growth in less sustainable locations and requires removal of large areas of Green Belt. This is contrary to the NPPF. The LPA run a substantial risk that the Local Plan would not be found sound in this regard as it is not 'Justified' or 'Consistent with national policy.'

Rugby Borough Council has been successful in delivering a substantial number of new homes on brownfield sites. The Authority Monitoring Report for 2023/4 indicates that some 35% of homes are built on previously developed land. It is therefore disappointing that the proposed strategy appears to be moving away from this more sustainable approach (which accords with the NPPF) in favour of substantial release of agricultural land in the Green Belt.

The Council's latest Authority Monitoring report also demonstrates that the Council has managed to deliver substantially above the proposed 618 units per year based on the current strategy of 'urban concentration' and without substantial incursions into the rural area. This demonstrates that there is no need or justification to now pursue a less sustainable strategy of dispersal.

Draft Policy S4 - Sites for Gypsies and Travellers

Four of the six sites proposed in the emerging Local Plan for Gypsy and Traveller sites are in the Green Belt.

Rugby Borough Council are not applying National Policy contained in the NPPF or the 'Planning policy for traveller sites' guidance in the selection of sites. The national policy states:

"16. Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development unless the exceptions set out in chapter 13 of the National Planning Policy Framework apply."

These allocations in the Green Belt do not meet the 'exceptions' set out in the NPPF.

Large swathes of land in Rugby Borough fall outside of the Green Belt. An approach which would be more compliant with National Policy would be to consider these areas first. There appears to be no justification for the allocations and no attempt to identify non-Green Belt sites.

Draft Policy S5 - Countryside protection

Draft Policy S5 sets out the emerging Local Plan approach to protecting the Countryside.

Part B of the policy states:

"B. The extent of the Green Belt in the borough is delineated on the policies map. National Green Belt policy will be applied in these areas."

The emerging policy clearly states that the plan will seek to comply with National Policies for the Green Belt. This is clearly not the case in the overall strategy being proposed in the 'Preferred Options Local Plan.'

As discussed elsewhere in these representation, National Green Belt policy is perfectly clear - **Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified** and Rugby Borough Council **should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.**

It is frustrating that the both Strategy Policy S1 (prioritising urban concentration) and the emerging Countryside Policy (S5) are promoting approaches that are then not reflected in the locations of growth.

The Preferred Options Local Plan identifies some 1,730 new homes on land that would need to be released from the established Green Belt, this includes 710 proposed new homes on some 40 hectares of Green Belt land at Wolvey alone.

These proposed Green Belt sites make up the majority of 'new' allocations (over and above those already completed, committed, and identified as allocations in the previous 2011 to 2031 Local Plan). This approach is contrary to the NPPF and runs the risk of the plan being found unsound because of its conflict with national policy.

There is no credible evidence to support why the Borough Council has chosen to pursue such a fundamental departure from established National Green Belt policy. Green Belt release should be the strategy of last resort and only used in exceptional circumstances. It is not designed to allow Local Planning Authorities to achieve 'easy wins' in areas for 'political reasons.'

Grey Belt

The Government introduced the concept of 'Grey Belt' in the 2024 NPPF. 'Grey Belt' refers to land within the Green Belt that is either previously developed or that does not strongly contribute to the Green Belt's core purposes including supporting the prevention of urban sprawl, the merging of towns and villages, preserving the countryside, and safeguarding the character of the Green Belt.

It is clear, in the case of Wolvey, that the options considered do not constitute 'Grey Belt.' In all cases, the land is in agricultural use and has, almost exclusively, not been previously developed.

Wolvey Parish Council consider that the Borough Council should primarily explore all options on previously developed land, sustainable locations close to the urban area and Grey Belt capacity before releasing vast swathes of Green Belt.

In summary, the Green Belt is a long-established and ongoing policy approach to guiding the strategic locations for growth and preventing inappropriate development. The fundamental principles of Green Belt are its permanence and allowing its release only in exceptional circumstances. The Local Plan does not provide sufficient justification as to why the substantial release of Green Belt are the cornerstone of emerging policy, particularly when there are clearly other strategic solutions to delivering growth in more sustainable locations.

Draft Policy S6 - Residential allocations

Draft Policy S6 details the sites proposed by the LPA to accommodate future growth identified in Draft Policy S2.

These representations have already stated why Wolvey Parish Council consider the specified need is excessive and the proposed distribution unjustified, so this need not be repeated here. The focus of comments in relation to Draft Policy S6 relate to the specific sites identified in Wolvey Village and the Parish Council's concerns about their suitability and lack of justification as allocations. The representations also seek to question why, other more sustainable options, have not been considered by the LPA.

Quantity of development

Draft Policy S6 identifies three sites in Wolvey village totalling 710 proposed dwellings. The sites are identified in the 'Annex: Development site allocations' section of the document. They comprise: site 84 (Land south of Leicester Road, Wolvey (60 dwellings)) site 96 (Land at Coventry Road, Wolvey (500 dwellings) and site 309 (Land north of B4109, Wolvey (150 dwellings)).

The Council's justification for the quantity of development proposed for the village is flawed. It is acknowledged that Wolvey is designated a 'Main Rural Settlement' (as it was in the adopted Local Plan 2011 to 2031). The key issue is the disproportionate quantity of development proposed. The Council's own evidence, contained within the 'Rural Sustainability Study,' identifies Wolvey as the smallest and 'lowest ranked' of the Main Rural Settlements. It is therefore incomprehensible why it is proposed as the settlement which is to receive the largest allocation of proposed homes.

The 'Rural Sustainability Study' scores each settlement in Rugby Borough based on access to services, public transport, and internet. Wolvey scores 35 points, the lowest of the 'Main Rural Settlements', yet is proposed to have the highest housing requirement. This is counterintuitive and is a flawed approach that cannot meet the test of soundness that requires plans be 'justified' and based on evidence. The evidence does not support the scale of growth.

The evidence also appears to be inaccurate. It is agreed that Wolvey has a Community centre, Convenience shop, Doctor's surgery, Post Office, and Primary school. In total this would score 20 points (5 x 4 points). However, of the desirable services, Wolvey has only a Café or restaurant (if the public houses are counted as such), a mobile Library, Nursery, Place of worship and Recreational open space. This would score 10 points (5 x 2 points). This would score 30 points in total. This is somewhat immaterial as Wolvey is the lowest scoring Main Rural Settlement anyway.

It is important to note, in the context of Draft Policy S6, that 710 new dwellings for Wolvey village are more homes than the 'additional development' (excluding previous allocations) proposed for Rugby (700) and substantially more than the highest ranked Main Rural Settlements of Dunchurch (210) and Binley Woods (0). The justification for this skewed approach is not clear or logical in the context of the evidence.

The 'Rural Sustainability Study' acknowledges that, at 2024, there were only some 357 dwellings in Wolvey Village. 710 additional dwellings would increase the size of the village by some 200%. This is a totally disproportionate level of growth, particularly given the unsustainable location and substantial loss of Green Belt land required.

To put the level of growth proposed for Wolvey into perspective, the annual household growth for the Borough of Rugby as a whole is some 1.3%. If this were applied to Wolvey village, the total housing required over the plan period (even the extended 2024 to 2045 period) would be 111. This could be a proportionate level of growth over twenty years. It would be challenging but potentially deliverable without the catastrophic adverse impacts that 710 homes would bring. There can be no 'planning' justification to promote 710 units in an unsustainable location in the Green Belt. It appears to be an entirely 'political' approach and not one based on sound planning judgement and evidence.

Each of the individual sites will be considered in turn below.

Specific sites

Land south of Leicester Road, Wolvey (Site 84)

The proposed allocation is an extension to the 'Kingmakers View' (Former Galliford Try employment site) development. The plan proposes an additional c.60 dwellings. The current development was allocated through the Wolvey Neighbourhood Plan and the Rugby Local Plan. The previous allocation was logical given that it involved redevelopment of a redundant employment site and was on previously developed land. There were multiple other benefits in that: The design of the former employment buildings was poor. Many former buildings were temporary in appearance, of 'functional' design and detracted from the setting of the Grade II* Listed Church and adjacent Wildlife site. New homes were a more compatible use; the development was 'transport neutral' (i.e. it was accepted that there would be vehicle movements associated with new occupants of the homes, but these were unlikely to be greater than the previous large employment site that would have generated car travel); the scale of growth was proportionate, it provided a justifiable quantity of dwellings to meet local needs and contributed towards wider housing requirements.

Green Belt

Site 84 is a green field site that would result in loss of Green Belt land. The NPPF is clear that LPAs should have first exhausted all reasonable opportunities to develop land outside of the Green Belt and that “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified” (NPPF para 145).

Designated heritage Assets

The proposal is on ‘rising topography’ that would be prominent in the landscape and have an adverse impact on the Grade II* Listed St John the Baptist Church (a designated heritage asset of substantial importance.)

Landscape

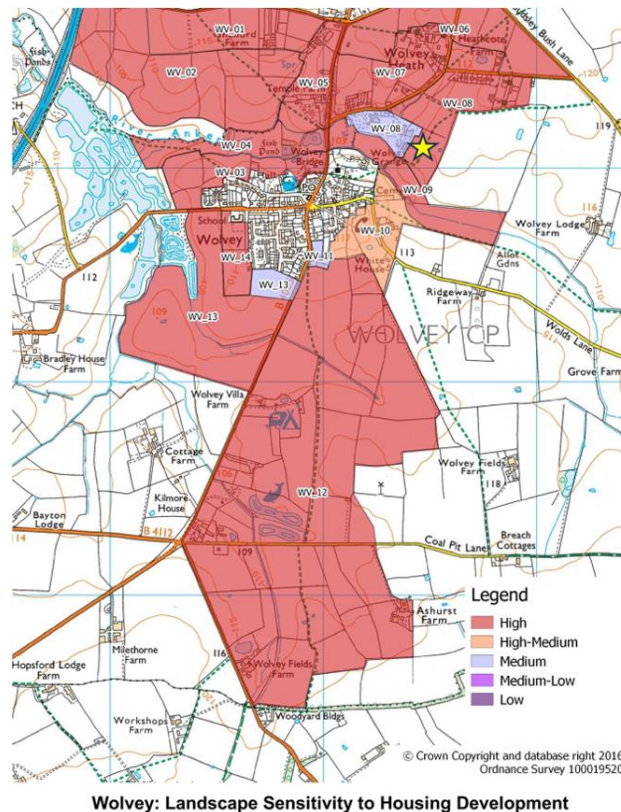
Rugby Borough Council previously commissioned independent landscape evidence to provide evidence for the adopted Local Plan. ‘Warwickshire County Council (WCC) Landscape Architects’ produced a ‘Landscape Sensitivity Study’ report in 2016 which sought to assess potential impacts of growth on the landscape. WCC were appointed as a responsible and independent public body who could be relied on to produce unbiased evidence without being influenced by external parties. Given that ‘landscapes’ rarely change, (only their context) it is not unreasonable to assume that the Landscape Sensitivity Study evidence carried out in 2016 is still robust.

Site 84 was considered in the Landscape Sensitivity Study evidence at that time. The study looked at the parcels of land now proposed (and adjoining land)¹ for residential development. It concluded that there was a ‘High sensitivity to housing development.’ In particular, the study noted:

“Application site S16039 [Galliford Try] could be developed for housing providing this is limited to the existing developed site currently occupied by Galliford Try. Great care must be taken to ensure that views from the listed cottages and their setting are not detrimentally affected by the development. Development should not extend any further north than the application site to maintain the physical separation between Wolvey village and Wolvey Heath. The remainder of the zone has high sensitivity to development due to high ground, prominent skyline, and proximity to the river corridor in WV_09.”

The accompanying map shows the sensitive areas.

¹ Landscape Sensitivity Study 2016 – parcels WV-08 and WV-09.



Map 1. – Rugby Borough Landscape Sensitivity Study 2016 Source: Rugby Borough Council.

It is implausible to think that the landscape's sensitivity to new development would have degraded since 2016, the topography, heritage assets and river corridor are unaltered. It is therefore mystifying that the updated 'Rugby Borough Council Landscape Sensitivity Assessment (March 2025)' (which, for smaller sites, has been prepared in-house by Planning Officers and not qualified and experienced landscape professionals) has concluded that the impact on most measures is 'medium to low'. This is, at best, questionable.

Other considerations.

The proposal site is detached from the main body of the village and its key services, facilities, and public transport nodes. The distance from these may encourage car use to access the local school.

The proposal site is close to two Local Wildlife sites. There needs to be a thorough and independent assessment of the impact of additional residential proposals on these.

The proposed creation of a riverside walk and nature park is a 'red herring.' There is no certainty that this would be delivered and who would be responsible for the subsequent maintenance and upkeep. This appears to be a 'sweetener' to improve perceived acceptability of the site. The Parish Council are not in a financial position to manage such a facility. It is questionable whether c.60 homes could viably deliver

this facility alongside other financial contributions towards education, health, Biodiversity Net Gain, affordable homes etc.

Land at Coventry Road, Wolvey (Site 96)

The proposed allocation is a substantial extension to the south side of Wolvey. It proposes 500 new homes on sites to the east and west side of Coventry Road and links around the west side of Wolvey Village to Bulkington Road.

Green Belt

Site 94 would be a green field site that would require loss of substantial areas of Green Belt land (some 27 hectares). The NPPF is clear that LPAs should have exhausted all opportunities to develop land outside of the Green Belt and that “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified” (NPPF para 145).

Scale of development

The proposal (for c.500 homes) on land to the south of Wolvey is totally disproportionate. The proposed allocation of 500 homes is larger than the current number of homes in Wolvey Village and would more than double the village’s size (a 140% increase). There can be no planning justification for this scale of growth in an unsustainable, remote settlement with only modest access to services and facilities.

The proposed allocation is unsupported by meaningful evidence and totally contrary to normal custom and practice for allocation housing sites. It is normal to locate growth of this scale close to settlements with existing services and facilities and not in areas with poor access to employment, secondary education, retail & leisure opportunities and with very poor public transport and walking and cycling links.

The scale of growth proposed is contradicted by the Council’s own evidence which indicates Wolvey is both the smallest, and least well-served of the Main Rural Settlements. A policy of dispersal appears to be a politically driven approach rather than one grounded in evidence that a serious planning professional would conclude acceptable.

There can be no other conclusion than that the scale of proposed development would have a substantial adverse impact on the character of the village of Wolvey in terms of public realm, built form, countryside, and landscape.

Landscape

The ‘Landscape Sensitivity Study’ report (2016) concluded that the majority of land proposed at site 96 was of ‘High sensitivity to housing development’ (See map 1 above). It is acknowledged that a section of land to the west side of Coventry Road, South of Piper’s End and between the sports field (part of parcel WV-13) and a

smaller area to the east side of Coventry Road (part of parcel WV-11) were of 'medium sensitivity'. Some land to the east of Wolvey and off Wolds Lane was identified as 'Medium-High' sensitivity.

In particular, the Landscape Sensitivity study 2016 noted:

"The zone could accommodate some development in the north-eastern part, between the sports ground and the Coventry Road. Development should be designed sensitively, with a landscape buffer, to ensure it improves the existing hard settlement edge off the Coventry Road and strengthens and enhances the southern approach to the village. Development is inappropriate in the remainder of the zone due to the openness of views, its visibility, and the need to retain a green buffer between the settlement edge and fishery (potential Local Wildlife Site). Therefore, application site S16064 could be partially developed in accordance with the above constraints. Development should not extend further than the southern end of the sports ground. Application site S16013 is not suitable for development due to its openness, high visibility, and detachment from the existing settlement."

The more recent 'Landscape Sensitivity Assessment of Strategic Site Options - Rugby Borough Council March 2025' produced by Lepus consulting has downgraded these areas to low and medium sensitivity. This is not credible. The landscape has not degraded to such an extent that development is now of low sensitivity. The prominence of the site in the landscape (at the top of a plateau) and need for a buffer zone to the adjacent fisheries remains. It is questionable why this downgrading of sensitivity has occurred. LPAs should pursue evidence independently and not be tailored to fit political aspirations for growth locations.

The Lepus report contains multiple inaccuracies. The report indicates, that the landscape is "Relatively flat and uniform." This does not reflect the facts on the ground. The village, and in particular the western and southern sides of site 94 sit on an exposed ridge / plateau where there are important views from the river corridor to the west and rising land from the south. Wolvey Parish Council therefore consider that the scale and locations of proposed development would have substantial and unacceptable impacts on the landscape.

The Parish Council and Neighbourhood Planning Group would welcome a dialogue with the Borough Council to establish if there are any parts of site 96 that are considered mutually acceptable.

Other considerations.

The proposal for 500 new homes would place increased pressure on existing services and facilities. Based on the County Council's yield rates for primary education, there would be insufficient primary school places to accommodate the

proposed levels of growth. Any school extension would need to be funded by the developer which would have implications for viability which (along with other financial contributions) need to be fully assessed to ensure they are deliverable.

There is no secondary school in Wolvey. 500 new homes would result in a substantial number of secondary school pupils that would require a journey of some 4.5 miles to the nearest secondary school (in Bedworth). This is not a sustainable travel pattern and has cost implications for the public purse (The County Council, who already have stretched funds, have a duty to transport secondary school students who live more than three miles from the nearest school). Alternatively, it would result in increased car use. This is contrary to the NPPF which encourages access to services and facilities (including education) by sustainable modes.

The Preferred Options document states that “a small-format supermarket with between 250 and 500 square metres of floor space, together with a preschool / nursery and smaller units for Class E or community use”. There is no evidence to suggest that a pre-school or supermarket operator has been identified to deliver these. Forward planning is not a case of ‘if you allocate it they will come.’ Many local plans make the mistake of aspirational infrastructure that is rarely delivered. A small supermarket is also likely to cause the demise of the existing store (which is a proportionate size to meet the current and future needs of the village).

The west side of the proposal site is close to a potential ‘Local Wildlife site’ at the adjacent fishing lakes in the river corridor. There needs to be a thorough and independent assessment of the impact of additional residential proposals on this.

Land north of (Bulkington Road) B4109, Wolvey (Site 309)

The proposed allocation (Site 309) is an extension north-west of Bulkington Road for an additional c.150 dwellings.

Green Belt

Site 309 (like all sites proposed in Wolvey in the emerging Local Plan) is a green field site that would result in the loss of substantial areas of Green Belt (some 7 hectares). The NPPF is clear that LPAs should have exhausted all opportunities to develop land outside of the Green Belt and that “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified” (NPPF para 145).

Landscape

The ‘Landscape Sensitivity Study’ report (2016) concluded that the majority of land proposed at site 309 was of ‘High sensitivity to housing development’ (See map 1 above). The proposed allocation falls within parcel (part of WV-03) to the north of Bulkington Road.

In particular, the Landscape Sensitivity study noted:

“Development is inappropriate in this zone because of the strong rural character, locally prominent skyline, and connectivity to the wider farmland. The small scale, pastoral setting is closely associated with village settlements within and around the edge of the open plateau landscape. It also abuts a potential Local Wildlife Site to the west. Therefore, application site S16050 is inappropriate for development.”

The more recent ‘Rugby Borough Council Landscape Sensitivity Assessments, March 2025’ (which has been prepared in-house by Planning Officers and not qualified and experienced landscape professionals) has concluded that the impact is mostly ‘medium to low’. This is, at best, questionable.

For information, site 309 is incorrectly identified as ‘Land south of Leicester Road’ on the supporting map (pp.239) of the ‘Landscape Sensitivity Assessments 2025’. It also has an incorrect site area of 1.18 ha. All evidence should be accurate to inform the Local Plan. This helps with credibility. There is again strong concern that the ‘sensitivity to new development’ of site 309 has been inexplicably downgraded from the previous ‘independent’ Landscape Sensitivity Studies. The Council should pursue evidence independently and it must be credible to be found sound.

Summary

In summary, the three sites being promoted in Wolvey village through Draft policy S6 are flawed for the following reasons:

- They are all in the established Green Belt. The NPPF requires LPAs to first look outside of the Green Belt (much of Rugby town and south-east of the Borough is outside the Green Belt). Failure to properly evidence the exceptional circumstances could result in the plan being considered contrary to national policy, and therefore not sound.
- The locations are not sustainable. There are very limited employment opportunities in Wolvey and no provision of key services and facilities, including: secondary education; high level retail (convenience and comparison goods); commercial leisure; some medical facilities (hospital, dentist, and pharmacy). Access to all these rely on unsustainable private car journeys because of the paucity of public transport and other sustainable travel choices. This is contrary national policy and could result in the plan being considered unsound.
- The updated landscape evidence which underpins the site allocations directly contradicts previous independent landscape sensitivity evidence. All landscape sensitivity scores around Wolvey have been downgraded. This is questionable and raises concerns that (in the case of smaller sites) the

evidence has not been prepared by suitably qualified and experienced experts and in the case of larger sites that it is designed to fit the political narrative. Neither are acceptable approaches to delivering a credible evidence base.

- The scale of development is totally disproportionate to that of the current village. This is unjustifiable given the relatively remote and unsustainable nature of the village, its poor level of local services, facilities, employment opportunities and public transport offer.
- Wolvey Parish Council are still open to a meaningful dialogue that could identify a mutually acceptable scale of growth and suitable locations that do not harm the character of the village or its surrounding landscape and countryside.

Alternative approaches

Reduce the overall requirement of policy S6 by removing Green Belt sites

Local Plan production is required to assess all reasonable alternatives to growth.

Draft Policy S6 identifies Some 1,190 homes on seven sites² adjacent to the Rugby Urban Area. These appear to be sustainably located sites that are consistent with Draft Policy S1 and the NPPF and therefore appear to be 'justified'.

Given that the Local Plan seeks to unnecessarily 'overreach' in terms of the length of plan period and buffer allowances, the allocation of these 1,190 dwellings in the urban area are sufficient to meet the residual requirements for growth (over and above existing allocations, completions, and commitments) particularly if the reduced requirements of policy S6 are reduced by a shortened 2042 plan end date.

It is noted that there are further sites close to the urban area, which are outside of the Green Belt, that have been discounted early in the process. These should be reconsidered. This would offer an approach that is more consistent with the NPPF in terms of the retaining the permanence of the Green Belt, encouraging sustainable locations for growth, and delivering transport choice.

A change in the allocation of the SW Rugby 'Safeguarded Area'

There is a 'Safeguarded Area' within the South West Rugby allocation which could be allocated for either housing or warehousing.

² Site 62 - Morgan Sindall House, Rugby - 90 dwellings, Site 332 - Albert Street, Rugby - 25 dwellings, Site 122 - Fenley Fields, Cawston, Rugby - 80 dwellings, Site 40 - East of Kilsby Lane, Hillmorton, Rugby - 125 dwellings, Site 334 - Land off Barby Lane, Hillmorton, Rugby - 380 dwellings, Site 338 - Land south of Crick Road, Houlton - 250 dwellings, Newton Manor Lane, Brownsover - 240 dwellings

Based on the Borough Council's evidence, there is a "need" for 1,026,546 m² of B8 warehousing. The Local Plan seeks to allocate considerably more (1,231,987 sq m). This is an excess of 205,441 m². The excess includes allocating all the 'Safeguarded Area' within the South West Rugby allocation for warehousing. RBC consider that the 'Safeguarded Area' would provide 130,000 m² of warehousing.

The area of the 'Tritax' site overlaying the 'Safeguarded Area' is 40.7 hectares. RBC suggest a density of 35 dwellings per hectare for this site and assuming a net developable area of 27.2 hectares for housing, some 953 housing units could be delivered.

If the 'Safeguarded Area' were developed for housing, the Borough Council could still have surplus warehousing land.

Providing homes not warehousing at Coton Park

A similar approach could be applied to Coton Park East where RBC propose revisiting the *Coton Park East Masterplan Supplementary Planning Document* to substitute an agreed housing allocation for more warehousing. There is no need to 'over-supply' warehousing development. Strategic Warehousing is more 'footloose' than housing and there are already substantial Strategic B8 proposals and commitments in the wider 'Golden Triangle (M1, M6 and M42)' area and its environs. This includes substantial growth at DIRFT, Magna Park (Lutterworth), and South Coventry.

Derelict / low intensity land in the "High Access Zone" of central Rugby

The Local Plan identifies a "High Access Zone" in central Rugby. This is the most sustainable location for growth because of its availability of transport choice including public transport nodes, both rail and bus. It also has access to most primary services (shops, office employment, commercial leisure, Hospital of St Cross etc.) Making this the most sustainable area for redevelopment in the Borough.

The emerging Local Plan could encourage housing potential in these areas, including:

- Redevelopment of demolished accommodation at Biart Place (adjacent to the High Access Zone;
- Potential development of 'Rounds Gardens' within the High Access Zone. This is a 1.7-hectare site with potential for some 100 plus dwellings (assuming high density apartments).
- The northern arm of the former 'Clock Towers' shopping centre in the Town Centre stands derelict and there is an approved planning application for this site (R22/0657) which could yield some 210 dwellings.
- Land North of Rugby's railway station has a cleared site adjacent to Mill Road which is currently in use as a car park. This is a low intensity use for such a sustainable site. This car park has an area of some 1.3 hectares. If built out

to the same density as Charolais Gardens it could accommodate some 100 plus units.

- The derelict Myson House has secured planning permission (LPA ref: R22/1035) for 120 flats. This should be counted towards the overall requirements.
- The former GEC site North of Rounds Gardens could be redeveloped in a more sensitive way than that proposed in the recently refused planning application by St Modwen (LPA ref: R24/0111). The reasons for refusal included: insufficient sequential flood test; insufficient alternative sports facilities; failure to provide 10% Biodiversity Net Gain; and a safe access. All of these could be overcome to deliver a site in a highly sustainable location.
- The CEMEX office block site should also be included as a residential proposal. It is frequently the subject of public comment regarding redevelopment in the town centre. This site is currently the subject of planning application R22/1102 for a supermarket. If this is refused, or unimplemented, it offers a good opportunity to deliver new homes.

In summary, there are multiple sites within and around the 'High Access Zone' that offer opportunities to deliver housing growth in sustainable locations that accord entirely with the principles of sustainable development and are consistent with the NPPF. No stone should be left unturned in identifying such sites before the LPA pursue a strategy that promotes removal of substantial areas of the Green Belt in far less sustainable locations.

Smaller sites – car parks and disused buildings

RBC has committed to reviewing the use of its car parks in the centre of Rugby. This process should identify additional land for development. The Westway car park site appears little used and is some 0.3 hectares. This site could potentially provide around 20 dwellings.

The derelict car parking site in 'Railway Terrace' opposite Myson House is some 0.4 hectares and could provide around 20 dwellings. (Its potential would be greater if Stagecoach were to relocate their bus depot thus opening up the entire frontage to Rugby Railway Station to a Charolais Gardens style development).

St Matthews Church on Lawrence Sherriff Street is derelict. It could potentially provide specialist housing or meet the need for places of worship which is currently threatening the redevelopment of the Myson House site for housing.

Increasing the windfall allowance

It is acknowledged that windfall sites are a finite resource. However, based on previous monitoring evidence, 50 units per year appears to be unambitious. The Authority Monitoring Report for 2023/4 indicates that some 35% of homes are built on previously developed land, presumably many of these sites would be 'windfall' sites.

Climate change policies

There is a fundamental omission in the Council's emerging Climate Change policies. The policies only consider the contribution that 'Net zero buildings' and 'Renewable energy and low carbon technology' make to addressing the causes of climate change. They do not address some of the key causes of climate change and CO2 emissions, namely the 'location' of development and ensuring that growth seeks to maximise walking and cycling (the most sustainable modes of travel) alongside good access to public transport.

Paragraph 164 of the NPPF states (in the context of Climate Change):

"New development should be planned for in ways that:.....

b) help to reduce greenhouse gas emissions, such as through its location, orientation, and design....."

Locations that seek to minimise vehicular movements (and consequently CO2 emissions and other pollutants) will have substantial climate change benefits. The over-reliance on remote sites in the Green Belt will increase the propensity for vehicle movements, in particular private car journeys to the detriment of climate change objectives.

Paragraph 110 of the NPPF clearly sets out the Government's expectations in relation to the location of growth in the context of transport and climate change. It states:

"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."

Wolvey Parish Council encourage RBC to introduce a policy that sets out its aspirations for locating growth in sustainable locations as a way of minimising the contributions that private car travel makes to adverse impacts on climate change. This approach should then be reflected in the choices made for the location of growth. This is normal custom and practice in plan making and is somewhat disappointing the RBC have chosen not to pursue this sustainable approach.

Draft Policy CL2 - Renewable energy and low carbon technology

Wolvey Parish Council support draft policy CL2 insofar as it considers some renewable energy and low carbon energy development to be inappropriate development in the Green Belt.

Criterion F is supported insofar as it is important that renewable and low carbon energy development should have local community involvement and leadership.

Wolvey Parish Council recognise the contribution that renewable energy and low carbon energy production can make to minimising the impacts of climate change, but these should not be at the expense of the quality of the countryside. Locations outside of the Green Belt should be pursued first.

Environment Policies

Wolvey Parish Council broadly support Environment Policies EN1 to EN8. Protecting the best of the environment should be a fundamental objective of the plan.

Draft Policy EN1 - Biodiversity and geodiversity protection

In particular, the Parish Council supports policies that seek to protect designated and non-designated wildlife sites (Policy EN1.c). It is notable that the proposed allocations at Wolvey are close to, or adjacent, existing, and potential Local Wildlife sites. No convincing evidence has been provided that confirms whether the proposed allocations would result in harm to these sites or any justification for development outweighing this harm.

Draft Policy EN1 could go further and seek to protect areas of Best and Most Versatile (BMV) agricultural land, particularly in remote rural areas. This would be consistent with National Policy and help to protect a valuable resource. It is worthy of note that much of Wolvey and Wolvey Heath contains grade 2 agricultural land. Further research would be required to identify if other land falls within classification 3a (BMV).

Draft Policy EN2 - Landscape protection

Wolvey Parish Council fully support policies that seeks to protect existing landscapes.

WPC is concerned however that the policy is not reflected in the choice of proposed allocations. The policy clearly seeks to 'avoid significant adverse impacts on landscape character and significant adverse visual impacts. Previous independent landscape evidence indicated that the majority of sites (now promoted for residential development in Wolvey) were in areas which had 'High sensitivity to housing development' in landscape terms. If emerging policy EN2 were followed, most of the proposed sites in Wolvey would not be justified based on the evidence available. No doubt the LPA will claim that more up-to-date evidence indicates the landscape to be 'low to medium' sensitivity. However, this is disingenuous at best, and not reflected by the situation on the ground. Previous landscape evidence was impartial and conducted by suitably qualified and experienced experts. The updated evidence was not.

Parts B and C of policy EN2 indicate that:

“Development proposals must be located and designed to respect scenic quality and maintain a distinctive sense of place”

and that

“Development proposals must avoid detrimental impacts on landscape features which make a significant contribution to the character of the area or to the setting of a heritage asset or settlement.”

This appears to be a rational approach. However, it is not reflected in the proposed allocations. It is fanciful to think that a 200% increase in the size of Wolvey village could be achieved without substantial detriment to the character of the village. Wolvey village sits atop a ridge / plateau. There are watercourses to the north and west of the village (including the River Anker and an unnamed watercourse) that sit in shallow valleys below the village. Views of Wolvey from the South (Coventry Road) and west (Bulkington Road) are characterised by housing on top of the plateau. Development only extends down the slope to a modest extent. The proposed allocations to the west and south of Wolvey would extend growth substantially towards the watercourses along the valley slopes. This would have a substantial impact on the character of the village's urban form. This is something that previous landscape sensitivity assessments have identified but appears to have been overlooked in more recent evidence.

The proposed allocation at Wolvey Heath (part of Wolvey that sits on lower land in the River Anker valley) also has adverse impacts by extending growth up the valley slopes to higher ground. This is contrary to the character of this part of the village. There are also potential implications for the landscape setting of the Grade II* listed Church of Saint John the Baptist, which is the dominant feature atop the hill when viewed from the north.

In summary, landscape protection policies are supported. They should have been logically applied in the site selection process.

Housing Policies

Wolvey Parish Council have no comments on housing policies H1 to H8.

Wellbeing Policies

Wolvey Parish Council have no comments on Wellbeing policies W1 and W2.

Design Policies

Wolvey Parish Council broadly support Design policies D1 to D5. Any policies that seek to improve design quality, local distinctiveness and protecting the character of settlements is to be welcomed. However, the policy does not appear to be reflected in the scale of development proposed for Wolvey village which will have a harmful impact on local character, rural setting and built form.

In the context of Draft policy D4, WPC fully support a policy that seeks to protect Heritage Assets and their settings. The proposed development south of Leicester Road, Wolvey (site 84) has the potential to adversely impact on the setting of the Grade II* listed Church St John the Baptist.

Wolvey Parish Council recognise that 'Design Codes' can help to improve the design quality of development. These are supported in principle. The emerging Plan refers to the 'Wolvey village expansion design code.' It is noteworthy that this does not appear to be available for inspection as part of the evidence base supporting the Preferred Options Plan.

Notwithstanding this, production of a Design Code for expansion areas in Wolvey would be premature given the very substantial issues of principle that need to be overcome before detailed design matters could be considered.

Infrastructure Policies

The availability of 'infrastructure' should be a key consideration in determining the location of development. This relates to a wide range of infrastructure including: Social Infrastructure (primary and secondary schools, medical facilities, leisure opportunities, community facilities etc.); Transport infrastructure (particularly availability of a choice of transport modes and a transport network that has capacity and is safe); and Green Infrastructure.

Draft policy I1 - Transport

Wolvey Parish Council totally agree with draft Policy I1(A) which states that development should be designed in accordance with the 'transport user hierarchy' which prioritises active travel (walking and cycling) over private car use.

Wolvey Parish Council also supports draft Policy I1(B) which states:

"Development shall:

i. be located where car travel can be minimised and opportunities for walking, cycling and public transport can be maximised;...

iv. provide safe and convenient active travel routes within and connecting out from the development, including, if necessary, contributing to upgrading or creating new routes;

v. provide convenient access to public transport;

vi. for residential development, provide direct, clear, safe, and convenient walking links to existing and proposed local facilities;”

It is therefore somewhat surprising that the Council's emerging Local Plan seeks to pursue a 'dispersal' approach to locating new development which would inevitably result in increased reliance on private car use. This is primarily because of the paucity of public transport and remoteness of Wolvey Village from employment opportunities and key services and facilities.

Evidence from Sustrans and the Chartered Institution of Highways and Transportation (CIHT) suggest that walking distances of 800 metres and cycling distances of 3 kilometres are generally considered the acceptable standard to access services. There is no substantial employment, major retailing (convenience and comparison), hospitals, secondary schools, or commercial leisure opportunities in Wolvey or that are within these distances and which could be accessed sustainably.

The NPPF is also clear that development should be located where 'sustainable' modes of travel (walking and cycling) can be accessed. It is unrealistic to suggest that a significant proportion of any new residents would walk or cycle to the nearest well-served towns (Nuneaton 5.8 miles away) and Hinckley (4.7 miles away). There are no direct public footpaths or cycle lanes and access by cycle would be along busy, fast, and dangerous classified roads. Access to the nearest main town centre at Hinckley would involve crossing the A5 / M69 junction. The nearest major employment sites are at Sketchley Industrial Estate (Hinckley) which is four miles by road, and North Coventry (M6 junction 2) which is five miles by road. It is simply unrealistic to assume substantial sustainable travel from the proposed developments.

There are no meaningful public transport services that connect Wolvey to higher order centres. The '74 bus service' runs six journeys per day to Nuneaton and Coventry. It is infrequent and does not operate on Sundays and evenings. This frequency of service does not encourage modal shift to bus use. There are no proposals to enhance the service, and it is unlikely that financial contributions from developers would improve the frequency and number of services (given that it serves several settlements). Any financial public transport contributions would also add to viability challenges.

In summary, the policy approach of prioritising sustainable travel is supported. However, this is not reflected in the choice of substantial allocations being promoted in the rural areas, including Wolvey. It would be more appropriate to encourage growth in the more sustainable locations close to the town of Rugby or East Coventry. These locations have a greater prospect of new residents walking and cycling to access services and facilities, and have a better public transport offer.

A further detailed transport issue relates to the junction of Coventry Road and Bulkington Road. The junction has poor visibility (particularly when being accessed from the west along Bulkington Road). The junction would be placed under increased capacity pressure if the development proposed were to be pursued. This is compounded by ongoing hazardous parking close to the school.

Draft policy I3 - Communications infrastructure

Draft Policy I3 states: "Proposals for residential and commercial development which are major developments shall include full fibre broadband connections unless this is demonstrated not to be possible".

It is acknowledged that broadband is increasingly important. According to the Council's own evidence, contained in the 'Rugby Borough Council Rural Sustainability Study December 2024' Wolvey is the only village that scores zero in terms of the 'Access to Internet' score.

Draft policy I4 - Infrastructure and planning obligations

Wolvey Parish Council support the principles contained in Draft Policy I4 (A) which states:

"New development that exceeds the capacity of existing infrastructure or causes unacceptable impacts will only be permitted where it can be demonstrated that there is a reliable mechanism in place to deliver the requisite infrastructure upgrades when required and to mitigate the impacts."

There are serious concerns that the scale of development proposed for the village of Wolvey is not capable of being supported by the available infrastructure. There are also strong concerns that new development would not be able to deliver a satisfactory level of infrastructure in a viable manner.

Primary school

Wolvey has a 'One form entry' Primary School. At the time of drafting this response Wolvey Primary School has no available capacity in some year groups. There were 42 applications for 30 places for the 2025 / 26 intake year. Based on Warwickshire County Council's 'yield rates' for primary schools in Rugby Borough, there would be a

substantial increase in pupil numbers required for 710 additional homes. Whilst it is acknowledged that the school could be increased to a two-form entry school, this would need to be fully funded by the developer.

There has been a substantial increase in the cost of delivering new schools since COVID and this would place additional viability burdens on developers, alongside the other necessary infrastructure required.

Secondary Schools

The nearest secondary school (and the most commonly attended by Wolvey residents) is Nicholas Chamberlaine School and VI Form in Bedworth. This is more than 4 miles away. Whilst there is some capacity available at present, there are substantial recent developments in Bulkington and Bedworth that will reduce available capacity.

The key issue is that the nearest secondary school is more than 4 miles away. Any proposed new developments in Wolvey could result in additional unsustainable travel movements. This could encourage increased private car use, and also places additional financial burdens on the public purse as a result of the obligation on the Education Authority (Warwickshire County Council) to provide free transport to secondary schools which are more than three miles away, such as from Wolvey.

It is noted that there are proposals (under Draft Policy I6) for the provision of a new six Form Entry plus sixth form secondary school, at St Thomas Cross north east of Rugby. Surely it would be logical to secure new housing development close to where this emerging secondary school capacity is to be delivered.

It is however, perverse to expect all new development in the Borough of Rugby to contribute to this school. In particular villages, such as Wolvey, which are very remote from these proposed facilities, are unlikely to benefit from their construction and would require unsustainable lengthy travel journeys to access them. This does not appear to meet the CIL tests.

Special education Needs

The nearest Special Education Needs schools are in Nuneaton and Exhall (more than 5 miles away). Issues of accessibility similarly apply. There are two SEN schools and Multiple Secondary Schools in Rugby which seem the logical place to locate development.

GP Practice

The GP Surgery at Wolvey is part of the 'Burbage Surgery.' It has very restricted opening times, only Tuesday and Wednesday Morning (8.30am to 12.30pm) and Thursday afternoon (2pm to 6pm) with the commensurate difficulty in securing appointments. The surgery has limited available capacity and there is no potential for the surgery to expand given its site constraints. It is also the case that, even if there

were the land to expand, there is a very limited expectation that improved services would be delivered (based on scarcity of staff resources and available finances).

There is no pharmacy or dentist in Wolvey.

Retail Store

Wolvey currently has a small retail store selling a limited amount of convenience goods. The store also contains a post office. The proposed allocation to the east and west of Coventry identifies a potential 'small-format supermarket with between 250 and 500 square metres of floor space, together with a preschool / nursery and smaller units for Class E or community use'. Promising new infrastructure is a common tactic used in Local Plans to 'sweeten' development proposals. There is rarely any certainty that these will be delivered. In particular, retail operators are currently very cautious in their delivery strategies. There are far too many examples of where such infrastructure is promised only for the homes to be delivered without the facilities. Without certainty of deliverability, this approach is unsound.

Waste water disposal

There are capacity constraints in the disposal of waste water from Wolvey. High level discussions with Severn Trent Water have identified that the Wolvey sewage catchment area is served by a single pumping station, which does not have the capacity to accommodate the growth proposed. The proposed housing developments to the east and west of Coventry Road are at a lower elevation than the existing sewage system and would therefore need to be pumped. This has implications for both viability and carbon emission increases.

There are no proposals to improve drainage facilities in Wolvey over the next 5 years as part of the Severn Trent Water Asset Management Plan (AMP8). This would inevitably fall to the developer to fund, with commensurate viability implications.

There would need to be substantial improvements to available infrastructure to support the large-scale growth proposed in Wolvey. This primarily relates to education, health, transport (including junction and link improvements and public transport), water and other utilities and other social and green infrastructure.

No viability evidence or updated Infrastructure Delivery Plan has been made available so it is unclear whether the proposal would be viable and deliverable.

Sustainability Appraisal

Wolvey Parish Council wish to express strong concerns over the Sustainability Appraisal (SA) that accompanies the emerging Local Plan.

The purpose of the Sustainability Appraisal is to consider all reasonable alternatives before deciding on the most sustainable approach. The interim SA appears to have either not addressed, or dismissed, multiple options for the strategic location of growth and specific development opportunities.

There are many reasonable options, that have not been tested or pursued, which would be more consistent with Draft Policy S1. The strategy policy S1 recognises Rugby town as the optimum location for growth. It is counterintuitive that an SA would therefore support a 'dispersed' pattern of development (to remote rural areas with a lesser level of services, facilities, employment opportunities and transport choice) above a strategy and sites close to the urban area, yet this appears to be the conclusions of the interim SA.

Sites within and adjacent to the urban area should score more highly on many of the appraisal measures being considered are clearly more sustainable in terms of strategy policy S1.

In the context of Wolvey, the SA states:

"...Wolvey is a notably small main rural settlement with a low settlement score...."

The SA then goes on to conclude that:

"...the emerging preferred approach involves support for large-scale growth to the south (Site 96) to deliver a primary school expansion...."

It appears to involve a huge leap of faith that the massively disproportionate growth in 'Growth Scenario 1 (the preferred option)' is the most sustainable approach that could be pursued. From an 'outside perspective' it appears that the emerging plan has informed the SA rather than the correct approach of the SA informing the Local Plan Strategy.

Wolvey is the lowest ranking (and smallest) village being assessed and, for the reasons set out in this report, is clearly not the most sustainable location for growth.

Wolvey should score poorly for many of the SA appraisal sections such as:

Accessibility – The SA scores 'accessibility' for scenario 1 (the preferred option) as having a 'a significant positive effect'. This may be true of the sites close to Rugby, but it is illogical to conclude that Wolvey (and other rural villages) have good accessibility, both in terms of services & facilities, but also transport.

Climate change mitigation – The Sa concludes that scenario 1 best achieves climate change mitigation. This is illogical. Distributing growth to remote rural areas will clearly increase private car use, a major contributor to climate change.

Communities, health, and well-being – The SA indicates that, in the case of Wolvey, “there is clear potential for growth to deliver well-targeted benefits to the local community.....” This is both disingenuous and misleading. Wolvey is a small rural community (as the SA itself recognises). The imposition of 700 new homes does not ‘benefit’ the community. Homes at this scale are not for ‘the community’ (particularly given the aging demographic of the village). Development at this scale has a detrimental impact on ‘the community.’ Health and well-being can be damaged as the ‘skeleton’ medical service could not cope with the scale of growth proposed.

Landscape and townscape

The SA indicates that, for Wolvey, there are ‘medium/low landscape sensitivity’ issues. This appears to be based on the later ‘flawed’ landscape study. There would clearly be adverse landscape impacts if the quantity of development proposed were delivered.

Transport

Option 1 (the preferred option) again scores highest in terms of transport. This is simply not credible. The SA itself recognises that:

“There is a need to direct growth in line with accessibility, to locations where there is good potential to reach key destinations by active or public transport....”

However, the priority to deliver sustainable travel is not reflected in the scoring of scenario 1 (which scores best). This is presumably a consequence of some of the ‘Main rural settlements’ being included with the more sustainable ‘urban areas. A more nuanced approach is needed that tests the transport sustainability of the rural settlements (including Wolvey) separately from the urban area. This would clearly demonstrate weakness in the sustainability credentials of the rural areas.

In summary, The SA appears to have been led by, rather than inform, the emerging Local Plan. Some of the conclusions that Wolvey is a sustainable location for substantial growth are simply not credible. This has been compounded by the assessment methodology which combines both rural and urban areas in separate scenarios. A more effective approach would be to score individual settlements (or groups of settlements) to arrive at more robust and credible conclusions.

Conclusions

Wolvey Parish Council wish to make the strongest possible representations to the ‘Preferred Options Regulation 18 consultation’ for the emerging Rugby Local Plan. The main areas of concern with the Preferred Options Plan are:

- The plan has been prepared without any meaningful dialogue with Wolvey (and other) Parish Councils, Neighbourhood Planning Groups, and other important relevant bodies.

- The plan promotes a strategy of dispersal. This is both unsustainable and unjustified. The Borough has traditionally been able to deliver the required homes in sustainable locations close to the urban area of Rugby. This is a far more sound and sustainable approach which is more consistent with national policy contained in the NPPF.
- The emerging Local Plan has not adequately appraised all reasonable alternatives, particularly those strategic locations close to Rugby which are in far more sustainable locations.
- The plan would result in the loss of a substantial area of Green Belt land. This is contrary to policy contained in the NPPF and there is not meaningful demonstration that alternatives have been adequately explored. This risks the plan being found unsound because it is contrary to national policy.
- 710 additional dwellings would increase the size of Wolvey village by some 200%. This is a totally disproportionate level of growth and not supported by the Council's own evidence.
- The updated landscape evidence which underpins the site allocations inexplicably contradicts previous independent landscape sensitivity evidence. This is not credible as the surrounding landscape has not altered from the previous assessments carried out in 2016 (other than modest changes resulting from the recent development at Kingmaker's View).
- Wolvey does not have the infrastructure to support the proposed levels of growth. Some infrastructure (such as a secondary school, major retailing, pharmacy, dentist etc.) are unlikely to be delivered locally in any eventuality. There is no compelling evidence that other 'low key' infrastructure is viable, and therefore deliverable.