

## Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

**Name of the Local Plan to which  
this representation relates:**

Rugby Borough Council Proposed  
Submission Local Plan

**Please return to Rugby Borough Council by 5:00pm Friday 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with **Proposed Submission Consultation**  
**in the subject line, OR by post to:** Development Strategy, Town Hall, Evreux  
Way, Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each  
representation you wish to make.

## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Ryan"/>	<input type="text"/>
Last Name	<input type="text" value="Ashmore"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="██████████"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text" value="████████"/>	<input type="text"/>
Post Code	<input type="text" value="████████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="██████████"/>	<input type="text"/>

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S1 (Settlement Hierarchy) is considered unsound as it is not justified for the following reasons:

- The supporting evidence does not sufficiently justify Wolvey's placement within the settlement hierarchy.
- Housing development should be directed primarily towards the Rugby Urban Area, rather than being concentrated within smaller and less accessible rural settlements.
- The designation of 'Main Rural Settlements' appears inconsistent. Wolvey is the smallest of the rural villages and has the fewest services, yet it is proposed to accommodate the third highest level of housing growth.
- The village has restricted access to local services, community facilities, employment opportunities and public transport connections.

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

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.

- Due to its limited range of services, facilities, employment opportunities and public transport provision, Wolvey should be positioned within a lower tier of the settlement hierarchy, with no significant housing allocations.
- Given its small size and relatively isolated location, Wolvey is not an appropriate or sustainable location for the scale of development currently proposed.

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

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I consider it necessary to participate in the hearing sessions so I can confirm that my comments and views have been properly analysed and taken into due consideration.

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	Site 309				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The proposals for Site 309, land north of B4109, Wolvey, are considered to fail the Soundness Test as they are not justified and are inconsistent with national policy for the following reasons:

- The delivery of 150 dwellings would represent a disproportionate level of growth in relation to the size and character of the village.
- The site is located within the Green Belt, which conflicts with Government policy aimed at protecting such land from inappropriate development.
- Previous landscape assessments have identified this land as having a high sensitivity to residential development, indicating it is not a suitable location for housing.
- A section of the site adjoins a Local Wildlife Site, and the potential ecological impacts have not been adequately examined.
- Development at the proposed scale (150–210 homes) would create unsustainable pressure on local infrastructure, including the primary school, secondary school transport arrangements, GP services and the already limited public transport provision.
- The Council’s Sustainability Appraisal identifies Wolvey as a small rural settlement with a low sustainability score.

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

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.

The Local Plan should be amended in the following ways:

- Land north of the B4109 (Site 309) should be removed from the list of proposed housing allocations.
- Greater priority should be given to alternative sites located closer to the urban areas of Rugby and Coventry, where access to services, facilities, employment opportunities and public transport is significantly better.

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

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	Site 358				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The proposals for Site 358, Coventry Road, Wolvey, fail the Soundness Test as they are not justified and are inconsistent with national policy for the following reasons:

- The delivery of 60 dwellings at Site 358, alongside 150 dwellings at Site 309, would result in a level of growth that is disproportionate to the size and capacity of the village.
- Both sites are located within the Green Belt, which conflicts with Government policy intended to safeguard such areas from inappropriate development.
- The combined scale of development (up to 210 homes) would place significant and unsustainable pressure on local infrastructure, including the primary school, secondary school transport arrangements, GP services and the limited public transport provision.
- The Council's Sustainability Appraisal identifies Wolvey as a small rural settlement with a low sustainability score.

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

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.

The Local Plan should be amended as follows:

- Land at Coventry Road, Wolvey (Site 358) should be removed from the proposed list of site allocations.
- Priority should instead be given to alternative sites located closer to the urban areas of Rugby and Coventry, where access to services, facilities, employment opportunities and public transport links is significantly stronger.

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

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="CL1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 309"/>				

4. Do you consider the Local Plan:

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

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Policy CL1 (Net Zero Buildings) is considered to fail the Soundness Test as it is not justified and does not align with national policy.

- The Climate Change section of the Draft Local Plan does not fully reflect the requirements set out in the National Planning Policy Framework.
- Policy CL1 should also address the location of development, ensuring that new housing is directed to areas where walking, cycling and public transport are viable options, in accordance with national guidance. Wolvey, however, has limited employment opportunities, no nearby secondary schools, no supermarkets and very limited public transport provision, making it an unsuitable location for sustainable development.

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.

The Local Plan should be amended to include the following:

- A Climate Change policy should be introduced that clearly guides new development towards sustainable locations, while avoiding small and remote rural villages that are not appropriate for significant growth.

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

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

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="CL2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Policy CL2 (Renewable Energy and Low Carbon Technology) is considered unsound as it is not justified.

- Although the policy's objectives are generally appropriate, it is not suitable for application on sites located within the Green Belt.

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

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.

The Local Plan should be amended as follows:

- Policy CL2 should be revised to make clear that renewable energy and low-carbon developments are prioritised in locations outside the Green Belt.

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

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph		Policy	D1 to D5	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

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(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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While the overarching objectives of Design Policies D1 to D5 are generally appropriate, Policies D1 to D5 are considered unsound as they are not justified for the following reasons:

- The proposed scale of development in Wolvey, representing a 60% increase in the village's size, would have a significant adverse effect on its character, rural setting, and built environment.
- The potential impacts of growth of this magnitude on Wolvey's character should have been comprehensively assessed prior to the allocation of any sites.

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

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.

The Local Plan should be amended as follows:

- Land north of the B4109 (Site 309) should be removed from the list of proposed housing allocations.

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

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Name or Organisation: Mr Ryan Ashmore

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Site ID	<input type="text" value="Site 309"/>				

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(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Policy EN1 (Biodiversity and Geodiversity Protection) is considered unsound as it is not justified and does not align with national policy:

- Site 309, north of the B4109 in Wolvey, adjoins an existing Local Wildlife Site.
- No comprehensive ecological assessment appears to have been undertaken.

Given the site's location within the Anker Valley, a full ecological survey is necessary before any development proposals are considered.

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

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.

The Local Plan should be amended as follows:

- Land north of the B4109 (Site 309) should be removed from the proposed allocations to avoid potential impacts on local ecology.

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

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Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="EN2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 309"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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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.

<p>Policy EN2 (Landscape Protection) is considered unsound as it is not justified and does not align with national policy:</p> <ul style="list-style-type: none"> <li>• Site 309, north of the B4109 in Wolvey, was previously assessed as having high sensitivity to residential development, yet this finding has been disregarded in the Draft Local Plan.</li> <li>• Development on Site 309 would result in the expansion of Wolvey into the Anker Valley, causing substantial harm to both the landscape and the village's character.</li> </ul> <p>(Continue on a separate sheet /expand box if necessary)</p>
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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.

The Local Plan should be amended as follows:

- Land north of the B4109 (Site 309) should be removed from the proposed allocations to prevent harmful impacts on the landscape.

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

**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.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I consider it necessary to participate in the hearing sessions so I can confirm that my comments and views have been properly analysed and taken into due consideration.

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="I1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy I1 (Transport) is considered unsound as it is not justified and does not align with national policy for the following reasons:

- Wolvey is a small, isolated village with very limited accessibility and poor public transport provision—there is no bus service to Hinckley and only infrequent connections to Coventry and Nuneaton—making residents largely dependent on private vehicles.
- The village is distant from urban centres and lacks shops, employment opportunities, and secondary schools, with only limited leisure and healthcare facilities. As a result, both residents and schoolchildren must rely heavily on cars for day-to-day travel. (Continue on a separate sheet /expand box if necessary)

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.

The Local Plan should be amended as follows:

- Land north of the B4109 (Site 309) should be removed from the proposed allocations, given Wolvey's limited access to essential services, facilities, and public transport.
- Priority should instead be given to alternative sites closer to the urban areas of Rugby and Coventry, where residents would have better access to services, employment opportunities, and public transport links.

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

**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.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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:

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	I4	Policies Map	<input type="text"/>
Site ID	Site 309				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy I4 (Infrastructure and Planning Obligations) is considered unsound as it is not justified and does not align with national policy for the following reasons:

- The scale of development proposed for Wolvey cannot be supported by the existing infrastructure.
- Key infrastructure limitations include:
  - o The primary school is near capacity and cannot accommodate an additional 70 pupils.
  - o Wolvey has no secondary or SEN schools, requiring residents to travel significant distances.
  - o The GP practice operates limited hours, necessitating travel for healthcare services.
  - o The local shop is small and inadequate for weekly shopping requirements.
  - o Public transport provision is poor.
  - o There is no local dentist, pharmacy, or hospital, requiring further travel.
- It is unlikely that the proposed development would deliver sufficient improvements to mitigate these infrastructure constraints. (Continue on a separate sheet /expand box if necessary)

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.

The Local Plan should be amended as follows:

- Land north of the B4109 (Site 309) should be removed from the proposed allocations, as there is no evidence that existing infrastructure and services could accommodate additional residents.
- Priority should be given to alternative sites nearer to the urban areas of Rugby and Coventry, where access to services, facilities, employment opportunities, and public transport is significantly better.

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

**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.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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:

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S2 (Strategy for Homes) is considered unsound as it is not justified for the following reasons:

- The policy encourages an unsustainable pattern of development in rural areas, which is not supported by the evidence.
- It is inconsistent with the preferred Urban Concentration approach, as nearly 58% of new housing allocations (excluding sites carried over from previous Local Plans or with existing permission) are proposed in rural locations. (Continue on a separate sheet /expand box if necessary)

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.

The Local Plan should be amended to include the following:

- A larger share of new development should be directed to the urban areas around Rugby and Coventry, with growth in Wolvey and other remote rural villages reduced.
- Alternative sites are available that are better positioned in terms of strategic location and overall sustainability.

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

**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.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S5"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S5 (Countryside Protection) is considered unsound as it is not justified for the following reasons:

- The policy is inconsistent with national planning guidance.
- The Draft Local Plan proposes around 1,500 homes on land currently designated as Green Belt, which undermines the fundamental purpose of Green Belt protection.
- Development opportunities outside the Green Belt should be prioritised instead.
- The Council's evidence seeks to reclassify established Green Belt as 'Grey Belt,' despite its clear function in preventing the encroachment of development into the countryside. (Continue on a separate sheet /expand box if necessary)

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.

The Local Plan should be amended to include the following:

- Land allocations and designations should fully comply with the National Planning Policy Framework, with any changes to the Green Belt permitted only in clearly justified and exceptional circumstances.

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

**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.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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:

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S6"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S6 (Residential Allocations) is considered unsound as it is not justified and does not align with national policy.  
 Land north of the B4109, Wolvey (Site 309), should not be allocated for housing for the following reasons:

- A development of 150 homes would represent a disproportionate increase relative to the size of the existing village.
- The site lies within the Green Belt, which is contrary to Government policy.
- Previous landscape assessments have identified the land as highly sensitive to residential development, indicating it is unsuitable.
- Part of the site adjoins a Local Wildlife Site, and the potential ecological impacts have not been adequately considered.
- Development of this scale (potentially 150–210 homes) would place considerable pressure on local infrastructure, including the primary school, secondary school transport, GP services, and the limited public transport provision.
- The Council's own Sustainability Appraisal notes that Wolvey is a small rural settlement with a low sustainability score.
- For these reasons, the allocation is also inconsistent with Policy S1 (Settlement Hierarchy), Policy S2 (Strategy for Homes), and Policy S5 (Countryside Protection).

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.

The Local Plan should be amended as follows:

- Policy S6 should exclude the proposed allocation of 150 homes at land north of the B4109, Wolvey.
- Alternative sites should be prioritised in more sustainable and strategically appropriate locations, such as areas adjoining the urban centres of Rugby and/or Coventry.

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

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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:

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="CL1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy CL1 (Net Zero Buildings) is considered unsound as it is not justified and does not comply with national policy.

- The Climate Change section of the Draft Local Plan does not fully reflect the requirements of the National Planning Policy Framework.
- Policy CL1 should also take account of development location, ensuring that new housing is directed to areas where walking, cycling, and public transport are viable options. Wolvey, however, lacks local employment, nearby secondary schools, supermarkets, and has very limited public transport, making it an unsuitable location for sustainable development. (Continue on a separate sheet /expand box if necessary)

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.

The Local Plan should be amended to include the following:

- Introduce a Climate Change policy that guides new development toward sustainable locations, while avoiding small and unsuitable rural villages.

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

**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.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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:

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="CL2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy CL2 (Renewable Energy and Low Carbon Technology) is considered unsound as it is not justified.

- Although the policy's objectives are generally appropriate, it is not suitable for implementation on sites within the Green Belt.

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

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.

The Local Plan should be amended as follows:

- Policy CL2 should make clear that renewable energy and low-carbon developments are prioritised in locations outside the Green Belt.

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

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	D1 to D5	Policies Map	<input type="text"/>
Site ID	Site 358				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

<p>While the overall objectives of Design Policies D1 to D5 are broadly appropriate, they are considered unsound as they are not justified for the following reasons:</p> <ul style="list-style-type: none"> <li>• The proposed scale of development at Sites 309 and 358, representing a 60% increase in the size of Wolvey, would significantly harm the village's character, rural setting, and built form.</li> <li>• The potential impacts of growth of this magnitude on the character of the village should have been thoroughly assessed prior to allocating these sites.</li> </ul> <p>(Continue on a separate sheet /expand box if necessary)</p>
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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.

The Local Plan should be amended as follows:

- Land at Coventry Road, Wolvey (Site 358) should be removed from the list of proposed housing allocations.

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

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="EN2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy EN2 (Landscape Protection) is considered unsound as it is not justified and does not align with national policy:

- The proposed allocations fail to properly reflect the findings of landscape impact assessments.
- Development at Site 358 would extend Wolvey into Green Belt land, resulting in substantial harm to the village's landscape and character.

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

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.

The Local Plan should be amended as follows:

- Land at Coventry Road, Wolvey (Site 358) should be removed from the proposed allocations to prevent harmful impacts on the landscape.

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

**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.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="I1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy I1 (Transport) is considered unsound as it is not justified and does not align with national policy for the following reasons:

- Wolvey is a small, isolated village with very limited accessibility and poor public transport—there is no bus service to Hinckley and only infrequent connections to Coventry and Nuneaton—making residents largely dependent on private vehicles.
- The village is remote from urban centres and lacks shops, employment opportunities, and secondary schools, with only limited leisure and healthcare facilities. As a result, both residents and schoolchildren must rely on cars for the majority of their daily travel.

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

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.

The Local Plan should be amended as follows:

- Land at Coventry Road, Wolvey (Site 358) should be removed from the proposed allocations, given the village's limited access to essential services, facilities, and public transport.
- Priority should instead be given to alternative sites closer to the urban areas of Rugby and Coventry, where access to services, employment opportunities, and public transport is significantly better.

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

**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.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	I4	Policies Map	<input type="text"/>
Site ID	Site 358				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Policy I4 (Infrastructure and Planning Obligations) is considered unsound as it is not justified and does not align with national policy for the following reasons:

- The scale of development proposed for Wolvey (Sites 309 and 358) cannot be supported by the existing infrastructure.
- Key infrastructure limitations include:
  - o The primary school is nearly at capacity and cannot accommodate additional pupils.
  - o Wolvey has no secondary or SEN schools, requiring residents to travel significant distances.
  - o The GP practice operates limited hours, necessitating travel for healthcare.
  - o The local shop is too small to meet weekly shopping needs.
  - o Public transport provision is poor.
  - o There is no local dentist, pharmacy, or hospital, requiring further travel.
- It is unlikely that the proposed development would deliver sufficient improvements to mitigate these infrastructure constraints.

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

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.

The Local Plan should be amended as follows:

- Land at Coventry Road, Wolvey (Site 358) should be removed from the proposed allocations, as there is no evidence that existing infrastructure and services could support additional residents.
- Priority should be given to alternative sites closer to the urban areas of Rugby and Coventry, where access to services, facilities, employment opportunities, and public transport is significantly better.

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

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S1 (Settlement Hierarchy) is considered unsound as it is not justified for the following reasons:

- The evidence presented does not adequately justify Wolvey’s position within the settlement hierarchy.
- The majority of new development should be focused within the Rugby Urban Area, rather than in smaller, remote rural settlements.
- The classification of ‘Main Rural Settlements’ is inconsistent: Wolvey is the smallest and least well-served rural village, yet it is allocated the third-highest level of housing growth.
- The village has limited access to services, facilities, employment opportunities, and public transport.

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

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.

Wolvey should be assigned to a lower tier within the settlement hierarchy, with no major development allocated, due to its limited services, facilities, employment opportunities, and public transport provision.  
As a small and isolated village, Wolvey is not suitable to accommodate the scale of growth currently proposed.

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

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S2 (Strategy for Homes) is considered unsound as it is not justified for the following reasons:

- The policy promotes an unsustainable pattern of development in rural areas, which is not supported by the evidence.
- It conflicts with the preferred Urban Concentration approach, as almost 58% of new housing allocations (excluding sites with existing permission or carried forward from previous Local Plans) are directed to rural locations. (Continue on a separate sheet /expand box if necessary)

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.

The Local Plan should be amended to include the following:

- A greater proportion of development should be directed to the urban areas of Rugby and Coventry, with reduced growth in Wolvey and other remote rural villages.
- Alternative sites closer to urban areas should be prioritised, as they provide more strategic locations and greater sustainability.

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

**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.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

**Yes**, I wish to participate in hearing session(s)

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S5"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Policy S5 (Countryside Protection) is considered unsound as it is not justified for the following reasons:

- The policy is inconsistent with national planning guidance.
- The Draft Local Plan proposes around 1,500 homes on existing Green Belt land, which undermines the fundamental purpose of Green Belt protection.
- Development opportunities outside the Green Belt should be prioritised instead.
- The Council's evidence seeks to reclassify established Green Belt as 'Grey Belt,' despite its clear function in preventing encroachment into the countryside.

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

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.

The Local Plan should be amended as follows:

- Land allocations and designations should fully comply with the National Planning Policy Framework, with any changes to the Green Belt allowed only in clearly justified and exceptional circumstances.

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

**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.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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**Yes**, I wish to participate in hearing session(s)

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

Name or Organisation: Mr Ryan Ashmore

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S6"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Policy S6 (Residential Allocations) is considered unsound as it is not justified and does not comply with national policy.  
Land at Coventry Road, Wolvey (Site 358) should not be allocated for housing for the following reasons:

- The proposed 60 homes at Site 358, combined with 150 homes at Site 309, represent a disproportionate level of growth for the village.
- Both sites are located within the Green Belt, which conflicts with Government policy.
- The combined scale of development would place unsustainable pressure on local infrastructure, including the primary school, secondary school transport, GP services, and the limited public transport provision.
- The Council's Sustainability Appraisal identifies Wolvey as a small rural settlement with a low settlement score.
- For these reasons, the proposed allocations are also inconsistent with Policy S1 (Settlement Hierarchy), Policy S2 (Strategy for Homes), and Policy S5 (Countryside Protection).

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.

The Local Plan should be amended as follows:

- Policy S6 should exclude the proposed allocation of 60 homes at Land at Coventry Road, Wolvey.
- Priority should be given to alternative sites in more strategically appropriate locations, such as areas adjoining the urban centres of Rugby and/or Coventry.

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

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