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 Councilby 5:00pm Friday 13th March 2026 By email to: localplan@rugby.gov.ukwith **Proposed Submission Consultation in the subject line, OR by post to**: Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*		2. Agent's Details (if applicable)
Title	Mr	
First Name	Graham	
Last Name	Bassett	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[redacted]	
Line 2	[redacted]	
Line 3		
Line 4	[redacted]	
Post Code	[redacted]	
Telephone Number	[redacted]	
E-mail Address	[redacted]	

**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.*

(where relevant)

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

Name or Organisation: Mr Philip Ling

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

Paragraph		Policy	S1	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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, fails the Soundness Test as **Not Justified**for the following reasons:

- Supporting evidence does not justify Wolvey being where it is in the hierarchy
- The Rugby Urban Area should accommodate the majority of new growth not the less well-served and remote rural areas.
- The 'Main Rural Settlements' definition is not sound - Wolvey is the smallest and least well-served of all the Rural Villages yet has the third highest housing allocation.
- Wolvey has limited services, facilities, employment 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 in a lower category in the hierarchy and have no large developments because of its limited services, facilities, employment and public transport.
- Wolvey should be in a lower category in the hierarchy and have no large developments because it is a small remote village unable to accommodate the level of growth proposed.

(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 wish to attend 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 Graham Bassett

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

Paragraph		Policy	S2	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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 S2, Strategy for Homes, fails the Soundness Test as **Not Justified** for the following reasons:

- Policy S2 is not sound because it promotes an unsustainable pattern of development in rural areas that is not 'justified' by the evidence.
- The policy does not reflect the overall preferred strategy of Urban Concentration – it proposes nearly 58% of new allocations (over and above those in previous Local Plans and already with permission) in the rural areas.

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

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The local plan should be adjusted to reflect the following:

- More growth should be directed to the Urban Areas around Rugby and Coventry with a reduction in Wolvey and other remote rural areas.
- There are potential alternatives that are superior in terms of their strategic locations and sustainability.

(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 Graham Bassett

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

Paragraph		Policy	S5	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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, fails the Soundness Test as **Not Justified** for the following reasons:

- Policy S5 is not sound or justified as it is not consistent with National Policy
- TheDraft Local Plan intends to allocate circa 1,500 new homes on land that is currently established Green Belt. This does not 'protect' Green Belt.
- There are development options outside of the Green Belt that should be explored.
- The Council's evidence is contrived and seeks to identify large areas of Green Belt as 'Grey belt' even though it is well established green belt – these areas are needed to safeguard the countryside from encroachment

(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 adjusted to reflect the following:

- Allocations and designations should follow the National Planning Policy Framework and only allow changes to the Green Belt in exceptional cases.

(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 Graham Bassett

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

Paragraph		Policy	S6	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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, fails the Soundness Test as **Not Justified** and it is not consistent with National Policy.
Land north of B4109Wolvey (Site 309), should not be allocated for housing forthe following reasons:

- 150 new homes are of a disproportionate scale with the current village.
- The proposed allocation is within the Green Belt – contrary to Government Policy.
- Previous landscape studies have indicated that the land has 'High sensitivity to housing development'. It is therefore not suitable.
- Part of the site abuts a Local Wildlife Site. There has not been a sufficient assessment of the ecological impacts.
- 150 homes (and up to 210 homes) is too much for Wolvey's infrastructure in terms of pressure onthe primary school, travel to secondary school, GP practice, and the very limited public transport availability.
- The Council's own Sustainability Appraisal indicates that "Wolvey is a notably small main rural settlement with a low settlement score".
- All the above reasons also fail to be justified under Policy S1 Settlement Hierarchy, Policy S2 Strategy for Homes and Policy S5 Countryside Protection

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

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any policy or text. Please be as precise as possible.

The local plan should be adjusted to reflect the following:

- Policy S6 should delete the proposed allocation of 150 homes at 'land north of B4109, Wolvey'.
- Alternative sites should be considered in strategically preferable locations (such as adjacent to the urban areas 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)?

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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 Graham Bassett

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

Paragraph		Policy	CL1	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

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Policy CL1, Net Zero Buildings, fails the Soundness Test as **Not Justified** and it is not consistent with National Policy.

- The Climate change section of the emerging Local Plan is not sound because it is not consistent with the National Planning Policy Framework.
- Policy CL1 should also address the 'location' of development to ensure that new housing seeks to maximise walking and cycling (the most sustainable modes of travel) alongside good access to public transport in accordance with the National Planning Policy Framework.Wolvey has no employment potential, no secondary schools within reasonable walking or cycling distance, no supermarkets and very limited public transport.

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

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The local plan should be adjusted to reflect the following:

- There should be an additional Climate Change policy that sets out the Council's aspirations for locating growth in sustainable locations and not in unsuitable rural locations.

(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 Graham Bassett

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

Paragraph		Policy	CL2	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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, fails the Soundness Test as **Not Justified**. The concept is mostly sound but does not appear to be appropriate for developments in the Green Belt

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

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The local plan should be adjusted to reflect the following:

- Policy CL2 should be amended to specifically refer to locations for renewable energy outside of the Green Belt being preferred.

(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 Graham Bassett

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

Paragraph		Policy	EN1	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
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Policy EN1, Biodiversity and Geodiversity Protection fails the Soundness Test as **Not Justified**and is not consistent with National Policy:

- Land North of B4109 Wolvey (Site 309) is adjacent to an existing Local Wildlife site.
- A detailed ecological assessment does not appear to have been undertaken and given the location of Site 309 within the Anker valley, itmust be required prior to any informed decision.

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

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The local plan should be adjusted to reflect the following:

- Land north of B4109 (Site 309) should be removed from the plan as a proposed allocation to mitigate the potential ecological impact.

(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 Graham Bassett

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

Paragraph		Policy	EN2	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

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(2) is Sound	Yes		No	✓
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Policy EN2,Landscape Protection fails the Soundness Test as **Not Justified** and is not consistent with National Policy:

- Previously the land North of B4109 Wolvey (Site 309) was indicated to have "high sensitivity to housing development" in terms of landscape and this has been ignored in the draft local plan
- Site 309 would extend Wolvey into the Anker Valley and have a huge impact on the landscape and character of the village.

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

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The local plan should be adjusted to reflect the following:

- Land north of B4109 (Site 309) should be removed from the plan as a proposed allocation to mitigate the potential landscape impact.

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

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Name or Organisation: Mr Graham Bassett

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

Paragraph		Policy	D1 to D5	Policies Map	
Site ID	Site 309				

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(1) is Legally compliant	Yes	Yes	No	
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(3) complies with the Duty to co-operate	Yes	Yes	No	

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.

Whilst the concept of Design Policies D1 to D5 are mostly sound as any policy that seeks to improve design quality is a good thing, for the purpose of the Local Plan, Policy D1 to D5,Design Policies,fail the Soundness Test as **Not Justified**for the following reasons:

- The scale of development proposed for Wolvey (a 60% increase in village size) would harm local character, rural setting and built form.
- The potential impacts of large-scale growth on the character of Wolvey needed to have been fully considered before sites were proposed as allocations.

(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 adjusted to reflect the following:

- Land north of B4109 (Site 309) should be removed from the plan

(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:

I think it is important 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 Graham Bassett

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

Paragraph		Policy	I1	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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,fails the Soundness Test as **Not Justified** and is not consistent with National Policy for the following reasons:

- Wolvey is a small remote village with limited accessibility and poor public transport. No bus to the nearest town of Hinckley and infrequent bus service to Coventry and Nuneaton making commute only possible by car.
- Wolvey is remote from urban areas with no shops, jobs or secondary schools.Leisure and medical facilities are limited.Car travel is essential for work, leisure and travel and pupils have to be transportedto schools.

(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 adjusted to reflect the following:

- Land north of B4109 (Site 309) should be removed from the plan because Wolvey does not have good access to higher level services and facilities and poor public transport.
- There are better options close to the Urban Areas of Rugby and Coventry that should be considered first. Rugby has better services, facilities and employment opportunities and public transport.

(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 Graham Bassett

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

Paragraph		Policy	I4	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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, fails the Soundness Test as **Not Justified** and is not consistent with National Policyfor the following reasons:

- The scale of development proposed for the village of Wolvey is not capable of being supported by the available infrastructure.
  - Important areas of infrastructure that are lacking include:
- The primary school which near capacity and cannot accommodate another 70 pupils.
- There are no secondary or special education needs school in Wolvey requiring long journeys.
- The GP practice is only open on limited days (and only for part of the day) requiring long journeys
- The shop is small and not suitable for a weekly shop – requiring long journeys
- Public transport is poor
- There is no dentist, chemist or hospital – requiring long journeys
  - Improvements would be unlikely as a result of new 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 adjusted to reflect the following:

- Land north of B4109 (Site 309) should be removed from the plan because it has not been justified that the current available infrastructure and services can cope with an increase in population
- There are better options close to the Urban Areas of Rugby and Coventry that should be considered first. Rugby has better services, facilities and employment opportunities and public transport.

(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 Graham Bassett

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

Paragraph		Policy		Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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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The proposals for Site 309, land North of B4019, Wolvey, fail the Soundness Test as **Not Justified** and are not consistent with National Policy for the following reasons:

- 150 new homes are of a disproportionate scale with the current village.
- The proposed allocation is within the Green Belt – contrary to Government Policy.
- Previous landscape studies have indicated that the land has 'High sensitivity to housing development'. It is therefore not suitable.
- Part of the site abuts a Local Wildlife Site. There has not been a sufficient assessment of the ecological impacts.
- 150 homes (and up to 210 homes) is too much for Wolvey's infrastructure in terms of pressure on: the primary school, travel to secondary school, GP practice, and the very limited public transport availability.
- The Council's own Sustainability Appraisal indicates that "Wolvey is a notably small main rural settlement with a low settlement 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 adjusted to reflect the following:

- Land north of B4109 (Site 309) should be removed from the plan
- There are better options close to the Urban Areas of Rugby and Coventry that should be considered first. Rugby has better services, facilities and employment opportunities and public transport.

(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 Graham Bassett

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

Paragraph		Policy	S1	Policies Map	
Site ID	Site 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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, fails the Soundness Test as **Not Justified** for the following reasons:

- Supporting evidence does not justify Wolvey being where it is in the hierarchy
- The Rugby Urban Area should accommodate the majority of new growth not the less well-served and remote rural areas.
- The 'Main Rural Settlements' definition is not sound - Wolvey is the smallest and least well-served of all the Rural Villages yet has the third highest housing allocation.
- Wolvey has limited services, facilities, employment 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 in a lower category in the hierarchy and have no large developments because of its limited services, facilities, employment and public transport.
- Wolvey should be in a lower category in the hierarchy and have no large developments because it is a small remote village unable to accommodate the level of growth 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 think it is important 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 Graham Bassett

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

Paragraph		Policy	S2	Policies Map	
Site ID	Site 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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 S2, Strategy for Homes, fails the Soundness Test as **Not Justified** for the following reasons:

- Policy S2 is not sound because it promotes an unsustainable pattern of development in rural areas that is not 'justified' by the evidence.
- The policy does not reflect the overall preferred strategy of Urban Concentration – it proposes nearly 58% of new allocations (over and above those in previous Local Plans and already with permission) in the rural areas.

(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 adjusted to reflect the following:

- More growth should be directed to the Urban Areas around Rugby and Coventry with a reduction in Wolvey and other remote rural areas.
- There are potential alternatives nearer to urban areas that are superior in terms of their strategic locations and 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 Graham Bassett

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

Paragraph		Policy	S5	Policies Map	
Site ID	Site 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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, fails the Soundness Test as **Not Justified** for the following reasons:

- Policy S5 is not sound or justified as it is not consistent with National Policy
- The Draft Local Plan intends to allocate circa 1,500 new homes on land that is currently established Green Belt. This does not 'protect' Green Belt.
- There are development options outside of the Green Belt that should be explored.
- The Council's evidence is contrived and seeks to identify large areas of Green Belt as 'Grey belt' even though it is well established green belt – these areas are needed to safeguard the countryside from encroachment

(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 adjusted to reflect the following:

- Allocations and designations should follow the National Planning Policy Framework and only allow changes to the Green Belt in exceptional cases.

(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 think it is important 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 Graham Bassett

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

Paragraph		Policy	S6	Policies Map	
Site ID	Site 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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, fails the Soundness Test as **Not Justified** and it is not consistent with National Policy.
Land at Coventry RoadWolvey (Site 358), should not be allocated for housing for or the following reasons:

- 60 new homes at Site 358 and 150 new homes at Site 309 are of a disproportionate scale with the current village.
- The proposed allocation is within the Green Belt – contrary to Government Policy.
- 60 plus 150 homes is too much for Wolvey's infrastructure in terms of pressure on the primary school, travel to secondary school, GP practice, and the very limited public transport availability.
- The Council's own Sustainability Appraisal indicates that "Wolvey is a notably small main rural settlement with a low settlement score".
- All the above reasons also fail to be justified under Policy S1 Settlement Hierarchy, Policy S2 Strategy for Homes and Policy S5 Countryside Protection

(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 adjusted to reflect the following:

- Policy S6 should delete the proposed allocation of 60 homes at 'land at Coventry Road, Wolvey'.
- Alternative sites should be considered in strategically preferable locations (such as adjacent to the urban areas 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.

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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 Graham Bassett

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

Paragraph		Policy	CL1	Policies Map	
Site ID	Site 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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, fails the Soundness Test as **Not Justified** and it is not consistent with National Policy.

- The Climate change section of the emerging Local Plan is not sound because it is not consistent with the National Planning Policy Framework.
- Policy CL1 should also address the 'location' of development to ensure that new housing seeks to maximise walking and cycling (the most sustainable modes of travel) alongside good access to public transport in accordance with the National Planning Policy Framework. Wolvey has no employment potential, no secondary schools within reasonable walking or cycling distance, no supermarkets and very limited 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.

The local plan should be adjusted to reflect the following:

- There should be an additional Climate Change policy that sets out the Council's aspirations for locating growth in sustainable locations and not in unsuitable rural locations.

(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 think it is important 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 Graham Bassett

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

Paragraph		Policy	CL2	Policies Map	
Site ID	Site 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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, fails the Soundness Test as **Not Justified**. The concept is mostly sound but does not appear to be appropriate for developments in 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 adjusted to reflect the following:

- Policy CL2 should be amended to specifically refer to locations for renewable energy outside of the Green Belt being preferred.

(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)?

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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 Graham Bassett

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

Paragraph		Policy	EN2	Policies Map	
Site ID	Site 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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 fails the Soundness Test as **Not Justified** and is not consistent with National Policy:

- Allocations proposed in the emerging Local Plan do not reflect the available evidence in terms of impacts on the landscape.
- Site 358 would extend Wolvey into greenbelt land and have a huge impact on the landscape and character of the village.

(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 adjusted to reflect the following:

- Land at Coventry Road Wolvey(Site 358) should be removed from the plan as a proposed allocation to mitigate the potential landscape impact.

(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 think it is important 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 Graham Bassett

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

Paragraph		Policy	D1 to D5	Policies Map	
Site ID	Site 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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.

Whilst the concept of Design Policies D1 to D5 are mostly sound as any policy that seeks to improve design quality is a good thing, for the purpose of the Local Plan, Policy D1 to D5,Design Policies,fail the Soundness Test as **Not Justified** for the following reasons:

- The scale of development proposed for Wolvey at sites 309 and 358 (a 60% increase in village size) would harm local character, rural setting and built form.
- The potential impacts of large-scale growth on the character of Wolvey needed to have been fully considered before sites were proposed as allocations.

(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 adjusted to reflect the following:

- Land at Coventry Road Wolvey(Site 358) should be removed from the plan

(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 think it is important 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 Graham Bassett

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

Paragraph		Policy	I1	Policies Map	
Site ID	Site 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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,fails the Soundness Test as **Not Justified** and is not consistent with National Policy for the following reasons:

- Wolvey is a small remote village with limited accessibility and poor public transport. No bus to the nearest town of Hinckley and infrequent bus service to Coventry and Nuneaton making commute only possible by car.
- Wolvey is remote from urban areas with no shops, jobs or secondary schools. Leisure and medical facilities are limited. Car travel is essential for work, leisure and travel and pupils have to be transported to schools.

(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 adjusted to reflect the following:

- Land at Coventry Road Wolvey (Site 358) should be removed from the plan because Wolvey does not have good access to higher level services and facilities and poor public transport.
- There are better options close to the Urban Areas of Rugby and Coventry that should be considered first. Rugby has better services, facilities and employment opportunities and public transport.

(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:

I think it is important 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 Graham Bassett

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

Paragraph		Policy	I4	Policies Map	
Site ID	Site 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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,fails the Soundness Test as **Not Justified**and is not consistent with National Policyfor the following reasons:

- The scale of development proposed for the village of Wolvey (sites 309 and 358) is not capable of being supported by the available infrastructure.
  - Important areas of infrastructure that are lacking include:
- The primary school which near capacity and cannot accommodate more pupils.
- There are no secondary or special education needs school in Wolvey requiring long journeys.
- The GP practice is only open on limited days (and only for part of the day) requiring long journeys
- The shop is small and not suitable for a weekly shop – requiring long journeys
- Public transport is poor
- There is no dentist, chemist or hospital – requiring long journeys
  - Improvements would be unlikely as a result of new 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 adjusted to reflect the following:

- Land at Coventry Road Wolvey(Site 359) should be removed from the plan because it has not been justified that the current available infrastructure and services can cope with an increase in population
- There are better options close to the Urban Areas of Rugby and Coventry that should be considered first. Rugby has better services, facilities and employment opportunities and public transport.

(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:

I think it is important 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 Graham Bassett

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

Paragraph		Policy		Policies Map	
Site ID	Site 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	Yes	No	

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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The proposals for Site 358, Coventry Road, Wolvey,fail the Soundness Test as **Not Justified**and are not consistent with National Policyfor the following reasons:

- 60 new homes at Site 358 and 150 new homes at Site 309 are of a disproportionate scale with the current village.
- The proposed allocation is within the Green Belt – contrary to Government Policy.
- 60 new homes (and up to 210 homes when Site 309 is included) is too much for Wolvey's infrastructure in terms of pressure on: the primary school, travel to secondary school, GP practice, and the very limited public transport availability.
- The Council's own Sustainability Appraisal indicates that "Wolvey is a notably small main rural settlement with a low settlement 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 adjusted to reflect the following:

- Land at Coventry Road Wolvey(Site 358) should be removed from the plan
- There are better options close to the Urban Areas of Rugby and Coventry that should be considered first. Rugby has better services, facilities and employment opportunities and public transport.

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

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

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